



Our Policy on Privacy of Consumer Information

ABD Insurance and Financial Services is a member of the Greater Bay Bancorp family.

ABD Insurance and Financial Services and our affiliates, Greater Bay Bancorp and Greater Bay Bank N.A., understand how important personal privacy is to you. We know that your information is personal, and we recognize that you expect privacy and security for your personal and financial affairs. We also understand the need to safeguard our sensitive information about you that you have entrusted to us. Because of our commitment to protecting your privacy and the value we place on your relationship with us, we have adopted the Policy on Privacy of Consumer Information set forth herein.

Collection, Retention, and Use of Your Information. In the course of doing business with you, we collect, retain and use certain “nonpublic personal information” about you for several purposes. We use this information to conduct business with you; to develop or enhance our products and services; to understand your insurance needs so that we can provide you with quality products and superior service; and to protect and administer your insurance records. In addition, certain underwriting restrictions require us to collect information about you. We will disclose nonpublic personal information about you to insurance service providers (“Insurance Providers”) who partner with ABD Insurance & Financial Services.

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other insurance forms;
- Information about your transactions with us,
- Information we receive from a consumer reporting agency used to obtain loss history and payment plan eligibilities; and
- Information from the Department of Motor Vehicles to obtain your driving record when necessary.

We will disclose this personal information to our Insurance Providers in order to secure your insurance coverage(s). **Other than Insurance Providers, we do not disclose nonpublic personal information about our clients to nonaffiliated third parties. We do not disclose nonpublic personal information about our clients to our affiliates without their consent.**

Our Maintenance of Accurate Information. We have established procedures to help assure that your information is accurate, current and complete. We will respond to requests by you to correct inaccurate information in a timely manner.

Security Procedures to Protect Information. We restrict access to nonpublic personal information about you to those employees who need to know that information. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information. We educate our employees about the importance of confidentiality and client privacy through our internal procedures and processes, training programs and our policies on ethics.

Restrictions on Disclosing Information to Nonaffiliated Third Parties. We do not reveal specific information about your accounts or other personally identifiable data to nonaffiliated third parties, including Insurance Providers, for their use unless: (1) you request or authorize it; (2) the information is provided to help complete an insurance transaction initiated by you; (3) the information is provided to a consumer reporting agency; or (4) the disclosure otherwise is permitted or required by law (for example, to respond to a subpoena). We do not provide account or personal information to companies for the purpose of their independent marketing. If we have that opportunity in the future, we will notify you first to give you the chance to “Opt Out” of the marketing program.

Maintaining Your Privacy in Our Business Relationships with Nonaffiliated Third Parties. We may disclose, **with your permission**, the information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. It is sometimes necessary to provide personally identifiable information about you to a party outside ABD Insurance & Financial Services, such as a vendor or service company, to prepare client communications or to provide support for one or more of our products or programs. These vendors and service companies must agree with us to safeguard our confidential information about you and your products and services with us.

Disclosing Our Privacy Commitment to You. We want you to know and understand our commitment to your personal privacy and our use of information about you. We have prepared this Privacy Policy to demonstrate the high priority we place on protecting your privacy.

You have the right to request access to the personal information we have on record about you at any time. You can request amendments or deletions of any information in our possession. To obtain access to your information, please contact your Account Manager with ABD or submit your request in writing to: Personal Insurance Division – Privacy Department/1111 Broadway, Suite 1620/Oakland, CA 94607. You will be contacted within 30 days.

Limiting the Sharing of Information with Affiliates. We will continue to comply with the Fair Credit Reporting Act, as amended, and all related regulations and procedures in sharing and maintaining your personal information. If we change the terms of our Privacy Policy, we will notify you of all revisions at least 30 days prior to the change.