

What we do

FACTS**WHAT DOES SBA WORKS, A DIVISION OF FIRST FEDERAL BANK, DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and transaction history
- credit history and credit scores

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SBA Works chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SBA Works share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, respond to court orders and legal investigations.	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share

Questions?

Call 877-499-0572 or go to www.sbaworks.com.

What we do

<p>How does SBA Works protect my personal information?</p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We do not collect identifying information about visitors to our site; we do use standard software (“Cookies”) to collect information for the strict purpose of tracking activity on our site.</p>
<p>How does SBA Works collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ give us your contact information or apply for a loan <p>We also collect your personal information from other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes— information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>SBA Works does not have any affiliates.</i>
<p>Non-affiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>SBA Works does not share with non-affiliates so they can market to you.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>SBA Works does not have any joint marketing agreements between nonaffiliated financial companies.</i>

Other Important Information

For California Customers: In accordance with California law, we will not share information we collect about you with companies outside of SBA Works, a division of First Federal Bank, unless the law allows. For example, we may share information with your content, to service your accounts, or to provide rewards or benefits in which you are entitled. We will limit sharing among our companies to the extent required by California law. For additional information regarding your rights, please refer to the Privacy Notice for California residents (www.ffbf.com/ccpa).