

FACTS	WHAT DOES TOTALDIRECTBANK BY TOTALBANK, A REGISTERED TRADEMARK OF CITY NATIONAL BANK OF FLORIDA (HEREINAFTER REFERRED TO AS “TOTALDIRECTBANK”), 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: <ul style="list-style-type: none"> • Social Security number and credit history • Account balances and payment history • Transaction history and overdraft history
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 TotalDirectBank chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does TotalDirectBank share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes — information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	Yes	Yes

To limit our sharing	<p>Mail the form below.</p> <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice, except as may be extended by applicable state law. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Go to www.totaldirectbank.com and click on the “Contact Us” tab, complete the “Contact Us” sections, and then click “Send.”

Mail-in Form		
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me.</p>	<p>Mark any/all you want to limit:</p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with non-affiliates to market their products and services to me.</p>	
	Name	Mail to:
	Address	TotalDirectBank
	City, State, Zip	c/o City National Bank
Account(s) #	P.O. Box 524470	
	Miami, Florida 33152-4470	

Who we are	
Who is providing this notice?	TotalDirectBank
What we do	
How does TotalDirectBank protect my personal information?	<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>TotalDirectBank uses cookies as part of our interaction with your browser. These cookies do not collect personal identifiable information.</p>
How does TotalDirectBank collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • open an account or make a wire transfer • pay your bills or apply for a loan • make deposits or withdrawals from your account <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<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>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Our affiliates include companies with a common corporate identity of CNB, and entities with the Banco de Credito e Inversiones, S.A. or Bci name.</i></p>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <p><i>Non-affiliates we share with can include credit card companies, insurance companies, direct marketing companies, and companies that provide financial products and services.</i></p>
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <p><i>Our joint marketing partners include credit card companies, insurance companies, direct marketing companies, and companies that provide financial products and services.</i></p>
Other important information	
<p>This Privacy Notice applies only to TotalDirectBank's consumer certificate of deposit and money market accounts, and any other consumer product that may be offered or made available. This Privacy Notice does not apply to any other product or service that you may obtain from TotalDirectBank. Additional information concerning TotalDirectBank's Privacy Guidelines & Notice can be found at https://www.totaldirectbank.com/disclosures or by calling 1-888-682-2881. All consumer personal information collected, processed, or disclosed is pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations. You may have other privacy protections under applicable law and to the extent applicable, we will comply with those provisions.</p>	

Vermont Residents: We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or maintain your account. We may share your information with our affiliates, so they may market to you. However, we will not share information about your credit worthiness with affiliates.

California Residents: We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account.

Nevada Residents: Nevada law allows us to make marketing calls to our existing customers listed on the National Do Not Call Registry. If you prefer not to receive marketing calls from us, you may be placed on our internal Do Not Call list by calling 1-888-682-2881. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, Grant Sawyer Building, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; phone: 702-486-3132; email: aginfo@ag.nv.gov.

North Dakota Residents: We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account.



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Member FDIC

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