

FACTS

WHAT DOES BPAS 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
- Account balances and transaction history
- Account transactions

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 Benefit Plans Administrative Services, Inc. ("BPAS") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does BPAS 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	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' necessary business purposes -- information about your transactions and experiences	Yes	No
For our affiliates' necessary business purposes -- information about your credit worthiness	No	We don't share
For our affiliates' to market to you	No	We don't share
For our non-affiliates' to market to you	No	We don't share

Questions?

Please Note: If you are a **new** customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.

Visit our website at www.bpas.com or call one of our office locations if you have additional questions.

What we do

How does BPAS protect my personal information?

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.

How does BPAS collect my personal information?

We collect your personal information, for example, when you complete

- Client profiles
- Applications or other forms

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliate financial companies, such as:

- Community Bank, N.A.
- Actuarial and Pension Services
- Hand Benefits & Trust

Non-affiliates

Companies *not* related by common ownership or control. They can be financial and non-financial companies. Benefit Plans Administrative Services, Inc. does not share with non-affiliates so they can market to you.

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

