Sunrise Banks Gramm-Leach Bliley Privacy Notice

FACTS WHAT DOES SUNRISE BANKS, N.A. 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 Payment History Credit History and Credit Scores
	When you are <i>no longer</i> 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 Sunrise Banks, N.A. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Sunrise Banks, N.A. Share?	Can you limit this sharing?
For our everyday business purposes - such as: to process your transaction, 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.	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



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Who we are	
Who is providing this notice?	Sunrise Banks, N.A.

What we do	
How does Sunrise Banks, N.A. 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, secured files and buildings.
How does Sunrise Banks, N.A. collect my personal information?	 We collect personal information, for example, when you Open an account or Deposit Money Pay your bills or Apply for a loan Make a wire transfer We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	 Federal law gives you the right to limit only: Sharing for affiliates everyday business purposes- information about your creditworthiness, Affiliates from using your information to market to you, Sharing for nonaffiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.

Definitions	
Affiliates	 Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include financial companies such as University Financial Corp. dba Sunrise Banks.
Non affiliates	 Companies not related by common ownership or control. They can be financial or nonfinancial companies. Sunrise Banks, N.A. does not share with nonaffiliates so they can market to you.
Joint Marketing	 A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include a credit card company.

Gusto U.S. Gramm-Leach-Bliley Consumer Privacy Notice

FACTS	WHAT DOES GUSTO 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 payment history salary 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 Gusto chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Gusto 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 nonaffiliates to market to you	Yes	Yes

To limit our sharing	Call (800) 936-0383 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. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Call (800) 936-0383

Who we are	
Who is providing this notice?	The Gusto family of companies. A partial list of these companies is located at the end of this document.
What we do	
How does Gusto 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 Gusto collect my personal information?	 We collect your personal information, for example, when you give us your contact information open an account or provide account information are paid by your employer apply for a loan We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	 Federal law gives you the right to limit only sharing for affiliates' everyday business purposes— information about your creditworthiness affiliates from using your information to market to you sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definition

Affiliate	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Our affiliates include companies such as ZenPayroll Inc., dba Gusto.
Nonaffiliate	 Companies not related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates we share with can include companies engaged in direct marketing and the selling of consumer products and services.
Joint marketing	 A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include companies engaged in the selling of financial products and services.

Other important information

Gusto legal entities: ZenPayroll Inc., dba Gusto, Gusto Capital LLC, ZP Insurance LLC, dba With Gusto Insurance Services.

For Vermont customers: We will not share information we collect about you with nonaffiliated third parties, except as permitted by Vermont law, such as to process your transactions or to maintain your account. In addition, we will not share information about your creditworthiness with our affiliates except with your authorization.

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

Rev. 05/2019