

Parlan Financial Corporation Privacy Policy

A Guide To How We Use And Protect Client Information

Your personal and financial data is private information. Whether you are an existing customer or considering a relationship with us, protecting your privacy is our priority. In compliance with new privacy regulations, Parlan Financial Corporation is required to provide you an annual notice informing you of your rights as a customer/consumer and our obligations as it relates to federal privacy laws recently enacted, under Regulation S-P to protect information you provide to us.

INFORMATION PARLAN FINANCIAL CORPORATION COLLECTS

This personal information, not available publicly, may come from the following sources of information that you may have provided us:

- Name, Address, and Phone Number
- Social Security Number and/or
- Taxpayer Identification Number
- Assets
- Liabilities
- Income
- Account Balance(s)
- Investment Activity
- Accounts at Other Institutions
- Inheritances
- Business Interests

*****Importantly, we want to assure you that we will not sell client information to anyone. Your rights as our customer/consumer are a priority to us.*****

WHY PARLAN FINANCIAL CORPORATION COLLECTS PRIVATE INFORMATION

In order to provide you with the best financial services and products available, we need to evaluate your information for any strengths or weaknesses. Our decisions regarding financial products and decisions must be based on sound judgements made from all the information you may have provided us. It also helps us service your accounts and administer our business.

For example, we use information about you to:

- Respond more accurately and efficiently to your requests.
- Identify opportunities to give you more convenience and control by developing products and services that may meet your objectives and benefit you.
- Secure your accounts and help protect you and Parlan Financial Corporation from fraud.

PARLAN FINANCIAL CORPORATION WILL SAFEGUARD PERSONAL INFORMATION YOU PROVIDE

You may rely on us to protect the personal and private information you have entrusted to us. Every precaution, in accordance with federal laws and regulations is used to limit access to personal information about you to those employees who need to know to assist us in providing products and services to meet you needs. Parlan Financial Corporation maintains internal physical, electronic and procedural safeguards to protect personal information about you. Some of the steps we take to safeguard information you provide us include the following:

- Information is provided only to those who have a legitimate reason to know. Employees of our office are required to adhere to company policies and procedures protecting customers'/consumers' information.
- In order to verify particular information, we may contact third parties such as: Third party administrators, Insurance companies, Employer Benefits Departments, and Employer Pension Departments.
- In accordance with any state or federal laws, we may be required to release information in certain circumstances (i.e. protection against fraud).
- Our company will maintain strict physical, electronic, and procedural measures to protect your information.
- By law, we are required to notify you of our privacy policy on an annual basis. Although we reserve the right to change our privacy policy, we will tell you of the changes promptly.

PARLAN FINANCIAL CORPORATION LIMITS THE SHARING OF INFORMATION

To protect your privacy, we limit the information we share both within and outside Parlan Financial Corporation. We conduct our business with great respect for the confidential nature of the information being provided. We will not share information about you, unless authorized by you, except as outlined below.

SHARING INFORMATION WITHIN PARLAN FINANCIAL CORPORATION

The sharing of information within Parlan Financial Corporation allows us to provide you with complete and superior service. We may share within Parlan Financial Corporation the information described above in the section captioned "Information Parlan Financial Corporation Collects." This includes information about your transactions or experiences with us, information you supply on your account applications, and information we receive from third parties.

PARLAN FINANCIAL CORPORATION SHARES INFORMATION WITH COMPANIES THAT HELP PROVIDE YOU SERVICE

Parlan Financial Corporation may share the information described under the section "Information Parlan Financial Corporation Collects" with companies external to Parlan Financial Corporation to complete a transaction you have requested or to help us service your account. We may also share information with other financial institutions with which we have a joint marketing agreement. We are highly selective in choosing these companies. All companies with whom we do business are contractually obligated to comply with strict standards regarding security and confidentiality, and the information can be used only for the sole purpose of providing the service we have requested of the company to perform.

Examples of the type of outside companies with which we may share information include:

- Financial Service Providers, including Charles Schwab, Ceros Financial Services, Trust Company of America, Sojourn Financial and Flexible Plan Investment
- Marketing Advisors, including MarketPlan and Linda Ferentchak
- CPA Advisors, including Davenport, Hanf & Crocker, LLC.
- Legal Advisors, including Law Offices of Marshall & Melhorn, L.L.C.
- Computer Support, including Nemsys LLC.

RIGHTS OF CONSUMER/CUSTOMER TO "OPT OUT" OF SHARING INFORMATION

You have the right to instruct us not to share among affiliated financial service companies certain information (other than information about our transactions and experiences with you) from your account applications or information we receive from third parties. If you do not want us to share this information about you, please call us at 419-885-1130. Your request not to share this information will apply to all of your accounts with us, including any new account you open after your original request.

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SHARING INFORMATION IN OTHER SITUATIONS

Parlan Financial Corporation may share the information described under the section captioned "Information Parlan Financial Corporation Collects" when we are permitted or required by law. Examples include responding to a subpoena, conducting a fraud investigation, or participating in a SEC examination. We may also share this information when authorized by you.

AN ONGOING COMMITMENT TO YOUR PRIVACY

We are just as committed to protecting the privacy of our former customers as we are our current customers. If you choose to close your account or become an inactive customer, you will continue to be protected by the privacy policies and principles described in the policy.

THANK YOU

At Parlan Financial Corporation, your business is important to us, and we promise to do our best to safeguard your financial assets and personal and financial information about you. If at any time we can help you further, please contact us at:

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