

FACTS**WHAT DOES SPERO FINANCIAL 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security Number and Income ■ Account Balances and Payment History ■ Transaction History and Credit History <p>When you are <i>no longer</i> our member, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share member's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their member's personal information; the reasons Spero Financial chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Spero Financial 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	No	We do not share.
For our affiliates' everyday business purposes— information about your creditworthiness	No	We do not share.
For our affiliates to market to you	No	We do not share.
For non-affiliates to market to you	Yes	Yes.

To limit our sharing:	<p>Call toll-free 800-922-0446</p> <p>Please note: If you're a new member, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our member, we continue to share your information as described in this notice. You can contact us at any time to limit our sharing.</p>
Questions?	Call toll-free 800-922-0446

Who we are?

Who is providing this notice?	Spero Financial
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What we do?

How does Spero Financial 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.
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How does Spero Financial 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 conduct a transaction ■ Pay your bills or apply for a loan ■ Use your credit or debit card <p>We also collect personal information from others such as credit bureaus, or other companies.</p>
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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 nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
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What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
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Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ Spero Financial has no affiliates.
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Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ The nonaffiliated we share with can include insurance companies, consumer reporting agencies, statement printers, and credit and debit card processors.
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Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ Our joint marketing partners include insurance companies.
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Other important information

Telephone Communications: All telephone communications with us may be monitored or recorded.