



Last Updated: October 3, 2011

FACTS **WHAT DOES SWBC 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:

- Information from product or service applications such as social security numbers, addresses, family information, and financial information.
- Information from your transactions with us or our affiliates such as account balances and payment history.
- Information from Industry databases and marketing data providers.
- Information from consumer or credit reporting agencies such as credit history and credit scores.

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 SWBC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SWBC Share?	Can you limit this sharing?
<p>For our everyday business purposes –</p> <p>As permitted by law for example, providing information in response to a subpoena or to industry regulators; to law enforcement agencies; for fraud prevention; or to credit bureaus.</p>	Yes	No
<p>For our marketing purposes –</p> <p>To offer our products and services to you.</p>	Yes	No
<p>For joint marketing with other financial companies –</p> <p>In entering joint marketing agreements with selected financial institutions such as insurance companies, credit unions, banks, automobile dealers, securities and investment companies, and home mortgage companies enabling SWBC to provide a wide array of products and services to our customers.</p>	Yes	No
<p>For our affiliates' everyday business purposes –</p> <p>Parties that assist SWBC in servicing your loan or account with us or provide services to you on our behalf such as insurers, credit unions, banks, or investigators. It is SWBC's policy to include confidentiality and data protection provisions in the contracts we make with these companies. We provide them with the limited information they need to perform their services for SWBC.</p>	Yes	Yes
<p>For our affiliates related to us by common control or ownership to market to you</p>	Yes	Yes
<p>For non-affiliates to market to you</p>	No	We do not share

To limit our sharing**Call:** +1 (800) 527-9966 or +1 (210) 525-1241**Visit us online:** swbc.com, or send an email to: compliance@swbc.com**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.

However, you can contact us at any time to limit our sharing.

Questions?**Call:** +1 (800) 527-0066 or visit us online: **swbc.com****Who we are**

Who is providing this notice?

Southwest Business Corporation (SWBC), SWBC Insurance Services, Inc., SWBC Life Insurance Company, SWBC Life Insurance Agency, Inc., SWBC Mortgage Corporation, Cotrak Insurance Services, Inc., SWBC Investment Company, SWBC Investment Services, LLC, AP Account Services, LLC

What we do

How does SWBC 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.

- Securing facilities with access controls at public points of entry, as well as the use of security systems.
- Access to customer records is restricted to only the employees determined to need the information to provide products and services to you, such as underwriting, claims processing, and policyholder service.
- Contractually requiring business partners to safeguard and prevent the unauthorized use of personal information.
- Protecting information through security-enhancing software such as virus and intrusion detection and prevention, and secure technologies to safeguard transmission of information through our websites as well as implementing data encryption and other security measures to protect against the loss, misuse, and alteration of data stored in our systems;
- Auditing company security practices.

What we do

How does SWBC collect my personal information?

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

- Open an account or make a payment to an affiliate.
- Pay your bills or apply for a loan with an affiliate.
- Use your credit or debit card.

We may also collect your personal information from others such as credit bureaus, affiliates, or other companies.

We may collect and store information about your visit to our website. To collect this information, our web server may write a “cookie,” which is a small file, to your hard drive. We may use cookies to enhance your online experience, to facilitate your use of our website and to collect anonymous, aggregated site-visitation statistics that we can use to measure the effectiveness of, and to improve, not only our website, but our products and services.

We may use standard Internet tools such as web beacons, which collect information that tracks your use of our website and enables us to customize our services and advertisements.

Log files allow SWBC to monitor, on an anonymous, collective basis, information such as:

- The Internet service providers that our customers and visitors use.
- The type of browsers, such as Microsoft Explorer or Mozilla Firefox that our customers and visitors use.
- The Internet Protocol addresses of our customers and visitors.
- The traffic on our web pages and the average time spent on each page.
- The number of first-time visitors and return customers to our website.

This information helps us monitor our website and ensures that it is accessible to customers and visitors. This information also helps us develop content and services that offer the best value and most benefits to our customers and visitors.

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 non-affiliates 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.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other important information

Our postal address is:

9311 San Pedro, Suite 600
San Antonio, Texas 78216

Vermont Residents – Your state law requires financial institutions to obtain your consent prior to sharing information about you with others. Except as permitted by law, we will not share information we collect about you with non-affiliated third parties or companies in our corporate family unless you call us at +1 (800) 456-9171 and authorize us to do so.

California Residents – Your state law requires financial institutions to obtain your consent prior to sharing information about you with non-affiliated third parties. Except as permitted by law, we will not share information we collect about you with non-affiliated third parties while you are a resident of California.