

Consumer Information Privacy Principles

Introduction

The PNC Financial Services Group, Inc. ("PNC") family of companies is committed to treating and using personal financial information about you responsibly. These Privacy Principles explain what personal information we collect, why we collect it, how we protect personal information, and how and why in certain cases we may share such information among PNC companies or with select other parties. We also tell you how to exercise your personal information sharing choices. If you have already notified us of your Information Sharing Choices, you do not need to notify us again. These principles are effective 05/01/06 and may be amended from time to time.

Our Consumer Information Privacy Principles apply to personal information collected or used when PNC companies offer financial services to you for personal, family or household purposes. The services may include deposit, lending, investment advisory, brokerage and insurance services. This disclosure is made on behalf of the following PNC companies: PNC Bank, National Association; PNC Bank, Delaware; J.J.B. Hilliard, W.L. Lyons, Inc.; PNC Investments LLC; PNC Capital Markets LLC; PNC Insurance Services, LLC; PNC Equipment Finance, LLC; Harris Williams LLC and PNC Merchant Services Company.

We Collect Information As Needed to Identify You and Serve You as a Customer

We collect information from and about you in order to identify you as our customer, establish and manage customer accounts, complete customer transactions, understand customer needs through market research, market products and services we believe meet customer needs, and comply with legal and regulatory requirements.

Examples of the types of information we collect are:

- **Information we receive from you, such as:**

Contact Information (such as name, address, and telephone number). We use contact information, for example, to identify you, send you information about our products and services, and call or write you about your accounts.

Identification Information (such as a social security number). We may need your social security number, for example, to obtain a credit report when you apply for credit with us, report interest earnings or mortgage interest payments to the IRS, or comply with other legal requirements.

- **Financial Profile Information** (such as income, assets, liabilities). We use this information, for example, to process applications and make appropriate product and service recommendations to help you get the most from your relationship with PNC.
- **Information about your transactions and experiences with PNC companies.** This information, such as your account balances, payment or overdraft history, parties to transactions and account usage, permits us, for example, to process your requests quickly, recommend appropriate products, and price products and services competitively on the basis of your entire relationship with us.
- **Information about your transactions with other companies.** We may use this information, for example, when you apply for credit or to verify information you have provided to us.
- **Information about you from consumer reporting agencies** (such as your credit history and credit worthiness). We use this information when, for example, we process applications, monitor and collect existing accounts, make “pre-approved” offers and as otherwise permitted by law.
- **Information from market research companies** (such as purchasing patterns). We use market research information, for example, to develop products we believe our customers will find most useful.

Policies and Procedures

PNC companies use advanced technology and information management techniques to implement security, audit and control programs designed to protect the confidentiality and security of the information we collect.

PNC limits employee access to customer information to those employees we believe have a legitimate business need for the information. We have adopted policies, procedures, employee orientation,

training and education programs, and communication programs designed for the protection of customer information. It is the responsibility of each PNC company employee to comply with our Consumer Information Privacy Principles.

We May Share Information Within the PNC Family of Companies To Improve Our Services to You

PNC offers financial services to consumers through its family of affiliated companies that provide, for example, deposit, lending, investment advisory, brokerage, insurance, trust, and related products. By sharing information about you and your accounts, we are able to offer you the convenience of round-the-clock customer service, combined statements, simple application procedures for a variety of financial services, and special discounts or other benefits.

Within the family of PNC companies, we share:

- Financial profile information, for example, income, assets and liabilities, that you provide to us on credit applications or elsewhere;
- Information that we receive from third parties not affiliated with us, such as consumer reporting agencies and market research companies.

You may request that we do not share these two types of information among ourselves except where one PNC company performs services for another. Please see “It’s Your Choice” (on page 4) to find out how to make this request.¹

We also share within the PNC family of companies contact and identification information, for example, name, address, telephone and social security numbers, that you provide to us. We also share information about your transactions with us, for example, account balances, payment or overdraft history, parties to transactions, and account usage. We will do so even if you request that we not share other types of information.

¹ **Vermont residents only:** PNC will not share financial profile or credit report information among the PNC family of companies without your consent.

We May Share Information Outside the PNC Family of Companies in Certain Cases

It is our policy not to sell, rent or otherwise provide customer information to outside companies so they can market their non-financial products or services.

From time to time, we may offer our customers the opportunity to purchase non-financial products and services offered by outside third parties, but we will not disclose customer information to these third parties unless our customers authorize us to do so.

The sections below describe the types of companies and third parties with whom, and the situations when, we may share customer information outside the PNC family of companies.

Service Providers and Suppliers

From time to time, PNC companies may use outside companies or suppliers to perform services for PNC, such as printing checks for our customers, preparing and mailing customer account statements, appraising property offered as collateral, verifying property ownership and processing customer transactions.

We may also use outside companies to perform market research and analysis for us by contacting our customers, as well as non-customers, to ask their opinions about our current or proposed products and services. Generally, we provide market researchers only with customer contact information, such as name, address, and telephone number. Occasionally, we provide them with customer account information, such as type of account, balance, and whether a customer banks at a branch, at an ATM, or online.

Sometimes we use outside companies to assist us in marketing our own PNC products and services or products and services, such as credit cards and insurance, that we offer jointly with other financial institutions. Generally, we provide our marketing service providers only with customer contact information, such as name, address and telephone number.

Before we disclose customer information to any of our service providers or suppliers, we require them to agree to keep our customer information confidential and secure and to use it only as authorized by us.

We May Share Limited Information With Select Financial Institutions for Marketing Purposes

In order to offer our customers certain financial products, such as credit cards or insurance, we may enter into joint marketing agreements with select financial institutions outside the family of PNC companies that specialize in providing these products.

Generally, we provide these financial institutions only with customer contact information, such as name, address, and telephone number. When we offer certain insurance products, such as credit insurance, we may provide account information, such as the amount of the loan or mortgage, maturity date, and monthly payment amount. We do not give these financial institutions customer account numbers as part of a joint marketing agreement or program.²

We select financial institutions we work with under joint marketing agreements very carefully and require them to agree to keep our customer information confidential and use it only as authorized by us.

You may request that we do not share your information with other financial institutions for joint marketing purposes. Please see “It’s Your Choice” (on page 4) to find out how to make this request.

Other Circumstances

We may share customer information with unaffiliated third parties when our customers request or give us permission to do so or when we are permitted or required to do so by law.

Some examples are:

- When we complete your transactions, such as paying your checks, following your online payment directions, purchasing securities for your account, or processing insurance applications;
- When we respond to your service requests;
- When we share information with consumer reporting agencies;

² **Vermont residents only:** PNC will share only contact information with financial institutions with which we have joint marketing agreements.

- When we verify account status for merchants you want to pay by check;
- When we transfer information in connection with a proposed or actual sale of accounts, or a proposed or actual sale of all or part of a business unit;
- When we suspect fraud or for risk management purposes;
- When we are required by a federal, state, or local law or regulation to do so;
- When we receive a subpoena or are ordered by a court to do so.

Former Customers

We do not disclose information about former customers to outside companies except as may be permitted or required by law. Examples of when we may share information about former customers are listed above.

State Privacy Laws

We will also comply with state privacy laws to the extent they apply.

Online Information Policies

We respect the privacy of our customers and are committed to protecting their information on our websites with the same care we utilize for all PNC company transactions. To view our current online privacy notice, visit us at pnc.com.

It's Your Choice

Option 1 — Limit Sharing Information Within PNC Family

Request this Information Sharing option if you do not want us to share among our family of PNC companies financial profile information, for example, income, assets and liabilities, contained in applications and financial statements, or information we receive from third parties that are not affiliated with us, such as consumer reporting agencies and market research companies.

We will continue to share among our family of PNC companies: (i) contact information, for example, name, address, telephone number; (ii) identification information, for example, social security number; and (iii) information that relates to our experiences or transactions with you or your accounts, for

example, account balances, payment history, parties to transactions and account usage.

Option 2 — Limit Sharing Information With Other Financial Institutions for Marketing Purposes

Request this Information Sharing option if you do not want us to share any information with other financial institutions for the purpose of joint marketing of their financial services.

To exercise your choice of Information Sharing options:

- Write to us at: PNC Information Sharing Options
PO Box 96066
Pittsburgh, PA 15226, or
- Call us any time at 800-762-2118, or
- Stop by any PNC office.

When writing, please indicate which Information Sharing option or options you are requesting and include your name, address and phone number. Providing an account number or social security number would be helpful but is optional.

PNC will process your request as soon as possible. However, you may receive communications for a short time based on information we shared prior to processing your request.

If you have joint accounts, we will treat a request by one party to the account as applying to both parties to the account. The information sharing restriction request(s) will apply to accounts that each joint account holder has in his or her own name and any accounts the joint account holders have with each other.

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