

Yes	No	Initial Privacy Notice
		<p>1. Does the institution provide a clear and conspicuous notice that accurately reflects its privacy policies and practices to all customers not later than when the customer relationship is established, other than as allowed in paragraph (e) of section four (4) of the regulation? [§4(a)(1)]</p> <p><i>(Note: no notice is required if nonpublic personal information is disclosed to nonaffiliated third parties only under an exception in Sections 14 and 15, and there is no customer relationship. [§4(b)] With respect to credit relationships, an Institution establishes a customer relationship when it originates a consumer loan. If the institution subsequently sells the servicing rights to the loan to another financial institution, the customer relationship transfers with the servicing rights. [§4(c)]</i></p>
		<p>Comments:</p>
		<p>2. Does the institution provide a clear and conspicuous notice that accurately reflects its privacy policies and practices to all consumers, who are not customers, before any nonpublic personal information about the consumer is disclosed to a nonaffiliated third party, other than under an exception in §§14 or 15? [§4(a)(2)]</p>
		<p>Comments:</p>
		<p>3. Does the institution provide to existing customers, who obtain a new financial product or service, an initial privacy notice that covers the customer's new financial product or service, if the most recent notice provided to the customer was not accurate with respect to the new financial product or service? [§4(d)(1)]</p>
		<p>Comments:</p>
		<p>4. Does the institution provide initial notice after establishing a customer relationship only if:</p> <p>a) the customer relationship is not established at the customer's election; [§4(e)(1)(i)] or</p> <p>b) to do otherwise would substantially delay the customer's transaction (e.g. in the case of a telephone application), and the customer agrees to the subsequent delivery? [§4 (e)(1)(ii)]</p>
		<p>Comments:</p>

		<p>5. When the subsequent delivery of a privacy notice is permitted, does the institution provide notice after establishing a customer relationship within a reasonable time? [§4(e)]</p>
		<p>Comments:</p>
		<p>6. Does the institution provide a clear and conspicuous notice that accurately reflects its privacy policies and practices at least annually (that is, at least once in any period of 12 consecutive months) to all customers, throughout the customer relationship? [§5(a)(1)and (2)] <i>(Note: annual notices are not required for former customers. [§5(b)(1)and (2)])</i></p>
		<p>Comments:</p>
		<p>7. Does the institution provide an annual privacy notice to each customer whose loan the institution owns the right to service? [§§5(c), 4(c)(2)]</p>
		<p>Comments:</p>
		<p>8. Does the institution deliver a revised privacy notice when it:</p> <ul style="list-style-type: none"> a. discloses a new category of nonpublic personal information to a nonaffiliated third party; [§8(b)(1)(i)] b. discloses nonpublic personal information to a new category of nonaffiliated third party; [§8(b)(1)(ii)] or c. discloses nonpublic personal information about a former customer to a nonaffiliated third party, if that former customer has not had the opportunity to exercise an opt out right regarding that disclosure? [§8(b)(1)(iii)] <p><i>(Note: a revised notice is not required if the institution adequately described the nonaffiliated third party or information to be disclosed in the prior privacy notice. [§8(b)(2)])</i></p>
		<p>Comments:</p>
		<p>Delivery Methods</p>
		<p>9. Does the institution deliver the privacy and opt out notices, including the short-form notice, so that the consumer can reasonably be expected to receive actual notice in writing or, if the consumer agrees, electronically? [§9(a)]</p>
		<p>Comments:</p>

		<p>10. Does the institution use a reasonable means for delivering the notices, such as:</p> <ul style="list-style-type: none"> a. hand-delivery of a printed copy; [§9(b)(1)(i)] b. mailing a printed copy to the last known address of the consumer; [§9(b)(1)(ii)] c. for the consumer who conducts transactions electronically, clearly and conspicuously posting the notice on the institution’s electronic site and requiring the consumer to acknowledge receipt as a necessary step to obtaining a financial product or service; [§9(b)(1)(iii)] or d. for isolated transactions, such as ATM transactions, posting the notice on the screen and requiring the consumer to acknowledge receipt as a necessary step to obtaining the financial product or service? [§9(b)(1)(iv)] <p><i>(Note: insufficient or unreasonable means of delivery include: exclusively oral notice, in person or by telephone; branch or office signs or generally published advertisements; and electronic mail to a customer who does not obtain products or services electronically. [§9 (b)(2)(i) and (ii), and (d)])</i></p>
		<p>Comments:</p>
		<p>11. For annual notices only, if the institution does not employ one of the methods described in question 36, does the institution employ one of the following reasonable means of delivering the notice such as:</p> <ul style="list-style-type: none"> a. for the customer who uses the institution’s web site to access products and services electronically and who agrees to receive notices at the web site, continuously posting the current privacy notice on the web site in a clear and conspicuous manner; [§9(c)(1)] or b. for the customer who has requested the institution refrain from sending any information about the customer relationship, making copies of the current privacy notice available upon customer request? [§9(c)(2)]
		<p>Comments:</p>
		<p>12. For customers only, does the institution ensure that the initial, annual, and revised notices may be retained or obtained later by the customer in writing, or if the customer agrees, electronically? [§9(e)(1)]</p>
		<p>Comments:</p>

		<p>13. Does the institution use an appropriate means to ensure that notices may be retained or obtained later, such as:</p> <ul style="list-style-type: none"> a. hand-delivery of a printed copy of the notice; [§9(e)(2)(i)] b. mailing a printed copy to the last known address of the customer; [§9(e)(2)(ii)] or c. making the current privacy notice available on the institution’s web site (or via a link to the notice at another site) for the customer who agrees to receive the notice at the web site? [§9(e)(2)(iii)]
		Comments:
		<p>14. Does the institution provide at least one initial, annual, and revised notice, as applicable, to joint consumers? [§9(g)]</p>
		Comments:
		Limits On Disclosure To Nonaffiliated Third Parties
		<p>15. Does the institution refrain from disclosing any nonpublic personal information about a consumer to a nonaffiliated third party, other than as permitted under §§13-15, unless:</p> <ul style="list-style-type: none"> a. it has provided the consumer with an initial notice; [§10(a)(1)(i)] b. it has provided the consumer with an opt out notice; §10(a)(1)(ii) c. it has given the consumer a reasonable opportunity to opt out before the disclosure; [§10(a)(1)(iii)] and d. the consumer has not opted out? [§10(a)(1)(iv)] <p><i>(Note: this disclosure limitation applies to consumers as well as to customers [§10(b)(1)], and to all nonpublic personal information regardless of whether collected before or after receiving an opt out direction. [§10(b)(2)])</i></p>
		Comments:
		<p>16. Does the institution provide the consumer with a reasonable opportunity to opt out such as by:</p> <ul style="list-style-type: none"> a. mailing the notices required by §10 and allowing the consumer to respond by toll-free telephone number, return mail, or other reasonable means (see question 22) within 30 days from the date mailed; [§10(a)(3)(i)] b. where the consumer opens an on-line account with the institution and agrees to receive the notices required by §10 electronically, allowing the consumer to opt out by any reasonable means (see question 22) within 30 days from consumer acknowledgement of receipt of the notice in conjunction with opening the account; [§10(a)(3)(ii)] or c. for isolated transactions, providing the notices required by §10 at the time of the transaction and requesting that the consumer decide, as a necessary part of the transaction, whether to opt out before the completion of the transaction? [§10(a)(3)(iii)]

		Comments:
		17. Does the institution allow the consumer to select certain nonpublic personal information or certain nonaffiliated third parties with respect to which the consumer wishes to opt out? [§10(c)] <i>(Note: an institution may allow partial opt outs in addition to, but may not allow them instead of, a comprehensive opt out.)</i>
		Comments:
		Limits On Redislosure And Reuse Of Information
		18. If the institution receives information from a nonaffiliated financial institution under an exception in §14 or §15, does the institution refrain from using or disclosing the information except: a. to disclose the information to the affiliates of the financial institution from which it received the information; [§11(a)(1)(i)] b. to disclose the information to its own affiliates, which are in turn limited by the same disclosure and use restrictions as the recipient institution; [§11(a)(1)(ii)] and c. to disclose and use the information pursuant to an exception in §14 or §15 in the ordinary course of business to carry out the activity covered by the exception under which the information was received? [§11(a)(1)(iii)] <i>(Note: the disclosure or use described in section c of this question need not be directly related to the activity covered by the applicable exception. For instance, an institution receiving information for fraud-prevention purposes could provide the information to its auditors. But “in the ordinary course of business” does not include marketing. [§11(a)(2)])</i>
		Comments: