

1st Equity Pay™ Auto Budget Payment Plan and Virtual Card Account

Privacy Policy

The 1st Equity Pay™ Auto Budget Payment Plan (the “Plan”) is issued and administered by MCB, member FDIC. The Plan is marketed and distributed by First Equity Payment, LLC. (“FEP”) on behalf of MCB.

Rev 09/18/2017

FACTS	WHAT DO METROPOLITAN COMMERCIAL BANK (“MCB”) AND FIRST EQUITY PAYMENT, LLC. (“FEP”) 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. “We”, “us”, and “our” collectively refers to MCB and FEP.
What?	The types of personal information we may collect and share depend on the product or service you have with us. This information may include, but not be limited to: <ul style="list-style-type: none"> • Social Security number and income; • Address and date of birth; • Email and phone number; and • Account balances, payment history, and transaction history. When you are no longer our customer, we may continue to share your information as described in this notice.
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, whether we share your information, and whether you can limit this sharing.

Reasons we can share your personal information	Do we 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	Yes
For our affiliates’ everyday business purposes— information about your transactions and experiences	No	We don’t share
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We don’t share
For non-affiliates to market to you	Yes	Yes

To limit our sharing	<ul style="list-style-type: none"> ■ Call (855) 931-4040, Option 1- Please be prepared to provide your account information so that we can verify your identity, or ■ Mail the form below. <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information thirty (30) days from the date we open your account or sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
-----------------------------	---

Questions	Call (855) 931-4040, Option 1.
------------------	--------------------------------

Mail-in Form	
Mark any/all you want to limit:	
<input type="checkbox"/> Do not share my personal information with non-affiliates to market their products and services to me.	
Full Name:	Mail to: First Equity Payment, LLC. 3 World Financial Center American Express Tower 200 Vesey Street, 24 th Floor New York, NY 10281
Address:	
City, State, Zip:	
Account # or Last 4 of SSN:	

Who we are	
Who is providing this notice?	This Privacy Policy is provided by MCB and First Equity Payment, LLC. and applies to our customers who open and use the Plan or related products or services.
What we do	
How do we protect your 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. We also maintain other physical, electronic and procedural safeguards to protect this information and we limit access to information to those employees for whom access is appropriate.
How do we collect your personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account; • Make deposits or withdrawals from your account; • Utilize the Plan; or • Request service on your account or provide account information or give us your contact information. <p>We may also collect your personal information from others, such as credit bureaus, affiliates or other companies.</p>
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 non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • We do not share with our affiliates.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • Non-affiliates we share with can include online payment companies, online marketing companies, and other marketing and distribution companies.
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • We may partner with certain non-affiliated financial companies to offer financial products and services to you.
Other important information: Special Notice for Residents of Certain States:	
<p>For Alaska, Illinois, Maryland and North Dakota Customers: We will not share personal information with nonaffiliates either for them to market to you or for joint marketing - without your authorization.</p> <p>For California Customers. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing without your authorization. We will also limit our sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.</p> <p>For Massachusetts, Mississippi and New Jersey Customers: We will not share personal information from deposit or share relationships with nonaffiliates either for them to market to you or for joint marketing - without your authorization.</p> <p>For Vermont Customers: We will not share personal information with nonaffiliates for them to market to you without your authorization and we will not share personal information with affiliates or for joint marketing about your creditworthiness without your authorization.</p> <p>For Nevada Customers: We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by following the directions in the "To limit our sharing" section. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number- 702.486.3132; email: BCPINFO@ag.state.nv.us.</p>	