FIRST NATIONAL REPO PRIVACY POLICY (Complete)

Our Commitment

FIRST NATIONAL REPOSSESSION and its affiliated companies - understand that you expect your non-public personal financial information and that of your customers, to be kept private and secure. We respect your concern about privacy, and we know you place your trust in us. FIRST NATIONAL REPOSSESSION has been a trusted name for over 17 years, and we are committed to continuing this tradition and to earning your trust every day.

FIRST NATIONAL REPOSSESSION Privacy Policy

Please take a few moments to read about how we protect, collect, and use your customers non-public personal information and how we may share the information. This policy applies only to information obtained in connection with services primarily for personal, family, or household purposes.

What Information We Collect When You Visit Our Website

When you browse: When you visit the FIRST NATIONAL REPOSSESSION website and browse, we do not collect any information about you without your explicit knowledge. We do however record statistics of page hits. We do this to determine which pages are visited most often, so we can enhance our website to make it more useful to our customers.

When you want information or perform online transactions: When you visit the FIRST NATIONAL REPOSSESSION website and request information or service, we collect the information we believe is necessary to safely process the transaction. For example, for FIRST NATIONAL REPOSSESSION Collateral Manager™ Extranet, you will be asked to enter your secret code and Program Identification. Our Internet Security policy more fully describes the information we collect to identify you for Internet transactions. We need to identify you to prevent access to your information by unauthorized persons. When you request information we may also collect information to help us understand your organization's needs in order to process your repossession request. We must collect some information, like Tax payer ID numbers, to comply with applicable laws and regulations. Federal law requires us to collect a tax identification number for tax purposes. We may also contact you or collect information to design new products or services, or modify existing products or services, in order to meet the needs of our customers more effectively.

How FIRST NATIONAL REPOSSESSION Collects Customer Information

You will enter data that is collected by FIRST NATIONAL REPOSSESSION. In addition to the information you provide, we

may collect information from consumer reporting agencies or your customer history with us. In addition, we record certain information about your company based on what you do in our website. For example, we will record the pages you visited. We use this information to compile research to better serve our customers.

********Use of "Cookie" Technologies (Bill Sorenson – Please review)**********

Some company websites including FIRST NATIONAL REPOSSESSION, place permanent cookies, or permanent electronic files, on your hard drive; the cookies collect data. We occasionally use permanent cookies and place a permanent electronic file on your computer. This means you may not have to re-enter your personal identification information each time you want to XXXXXXXXXX over the Internet with us.

We also use temporary cookies, which are automatically deleted at the end of a session or expire within 24 hours. These cookies improve the quality of your browsing experience by performing technical tasks such as web server performance, security and enabling you to enter your personal identifying information less frequently during a session with us.

If your browser lets you, you may decline our cookies, but if you do you may not be able to access all the features of our website including online access and bill payment and you will have to enter your personal identifying information more frequently during a session.

********How We Use the Information We Collect (Bill Sorenson please review)*********

We collect identifying information (such as your password or secret code) in online transactions to help us confirm you are really our client. If you do not provide the information we ask for, you will not be able to use our online services.

We may also use the information we collect about you to offer you products and services. See "Sharing Your Information" below.

Accuracy of Customer Information

FIRST NATIONAL REPOSSESSION has established audit procedures to maintain the accuracy and integrity of client and debtor's personal information. If you believe the personal information we maintain is incorrect, or if you would like to review your company account or debtor's personal information, please contact us.

Contact for Privacy Concerns

If you believe FIRST NATIONAL REPOSSESSION has not followed this Privacy Policy or if you have any questions or complaints regarding your privacy at FIRST NATIONAL REPOSSESSION, contact us. You may also write to us at:

FIRST NATIONAL REPOSSESSION
Attn: Repo Central

PO Box 231 Albertville, MN USA 55301

When FIRST NATIONAL REPOSSESSION will Contact You

If you request information and enter your request in this website, we will respond to you by the method we believe is most appropriate. For example, if you email us, we may respond by phone, mail, or email. In addition, we may contact you regarding products or services that we think you may be interested in or may be of benefit to you. Otherwise, we will contact you if we have questions or concerns about your assignment with us.

**********Security –(Bill Sorenson please review)********

We use industry standards to safeguard your personal identifying information, such as Secure Socket Layer (SSL) protocol and firewalls. These systems are designed to guard against unauthorized access and use of customer information by unauthorized individuals. We work to upgrade these features on an ongoing basis. See Internet Security for additional information regarding the steps we have taken to ensure your online transactions are secure.

Links To Other Web Sites

Clicking on certain links within this website will take you to other websites or material not under the control of FIRST NATIONAL REPOSSESSION. The operators of those other websites, and not FIRST NATIONAL REPOSSESSION, control those sites and determine what use will be made of information collected from users.

What Information We Collect About You

First and foremost, we collect non-public personal information about you in order to establish and service your account(s). We also collect this information so that we at FIRST NATIONAL REPOSSESSION may provide you the highest level of service. We collect non-public personal information about you, your company or client's from the following three general sources:

- Information we receive from you on Hold Harmless forms, in our Collateral Manager site or other forms received by fax.
- Information about your company and or debtor assigned to FIRST NATIONAL REPOSSESSION for recovery, Corporate collection and/or service of process.
- Information we receive from a credit/company reporting agencies. For example, Dunn and Bradstreet, IRB, Insight Collect, Search America and The Web Detective.

Sharing Your Information

We may share all of the non-public personal information that we collect about you, as described in this policy.

Sharing Your Information with FIRST NATIONAL

REPOSSESSION

We share all the non-public personal information we collect about you, as described above, within our OUR REPOSSESSION COMPANY and affiliated companies for a number of reasons, such as:

- To protect you. The information we maintain about our customers relationship helps us, identify you.
- To provide service. Your information allows us to respond to your requests.
- To tell you about services. You may receive coupons, special offers and incentives based on your account history, number of assignments referred and information we have about you
- To improve our products and service. We collect and analyze information about our customers' activity and history, and then we tailor new products to meet your needs.

Our FIRST NATIONAL REPOSSESSION'S affiliated companies are repossession, investigation, appraisers, software programmers and remarketing service providers.

We always have the right to share, within the OUR REPOSSESSION COMPANY, identifying and contact information from your company application, and information about our recovery attempts and transactions and experience with your accounts. If you do not want us to share, within the FIRST NATIONAL REPOSSESSION companies, the other information we obtain from your application such as asset information, and the information we obtain from consumer reporting agencies, see below.

Fair Credit Reporting Act Notice
Opt-Out of Sharing with FIRST NATIONALREPOSSESSION C

We always have the right to share, within FIRST NATIONAL REPOSSESSION, identifying and contact information from your application and information about our transactions and experience with your assignments. You may direct us not to share with other companies, the other information in your debtors application, such as asset information, and the information in your consumer reports by contacting us.

Please note that contacting us does not affect our right to share, within FIRST NATIONAL REPOSSESSION, identification and contact information from your assignment, as well as information about our transactions and experience with your account. In addition, even if you contact us, we will share all your information within FIRST NATIONAL REPOSSESSION when you ask us to.

What is a Consumer Report?

A consumer report is any written, oral, or other communication from a consumer reporting agency which bears on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used in whole or in part for the purpose of serving as a factor in establishing the consumer's eligibility for: (a) credit or insurance to be used primarily for

personal, family, or household purposes; (b) employment purposes; or (c) any other purpose authorized under section 604 of the Fair Credit Reporting Act.

Sharing Your Information with Other Companies

We share your and your clients non-public personal information outside FIRST NATIONAL REPOSSESSION for specific reasons. We do not share this information with non-FIRST NATIONAL REPOSSESION companies if you do not want us to. Simply contact us if you do not want us to share your information outside FIRST NATIONAL REPOSSESSION affiliated companies. (Note: There are certain categories of information we will always share even if you ask us not to - See "Sharing Customer Information for Service and Joint Marketing Reasons and When Required by Federal or State Law " below).

Unless you opt-out, we may share the following kinds of non-public personal information about you with third parties who are not part of FIRST NATIONAL REPOSSESSION affiliated companies:

- Information we receive from you regarding your companies or debtor's application or other forms, such as your name, address, assets, and income;
- Information about your transactions with us, FIRST NATIONAL REPOSSESSION affiliated companies, or others, such as your account balance, payment history, parties to transactions and account usage.

Types of Companies We Share With

We may share non-public personal information about you with the following types of third parties who are not part of FIRST NATIONAL REPOSSESSION affiliated companies:

- Service providers, such as investigators, database search operators, collection agencies and insurance companies and agents;
- Non-financial companies, such as Collateral Manager™ Extranet; and
- Others, such as government agencies and non-profit organizations.

Sharing Customer Information for Service and Joint Marketing Reasons, and When Permitted or Required by Federal or State Law

We may also share non-public personal information about you with third parties who are not part of FIRST NATIONAL REPOSSESSION affiliated companies for service and joint marketing reasons and when allowed by law.

Sharing Your Information With Service Providers

We may hire companies to provide materials or to perform some services for us. For example, we may hire A repossession company in another state to service an account out of our service area. To enable these service providers to perform the services for which we hire them, we need to give them some or all of the

information described in the "What Information We Collect About You" section above. Our service providers are not permitted to use any information we share with them about you for any purpose except to perform those services.

Sharing Your Information for Joint Marketing

We may enter into agreements with other repossession institutions (for example, Recovery associations) to jointly market products or services between us. In order to offer these products or services to you, we may share all of the information we collect, as described under "What Information We Collect About You" above, with companies that perform these marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.

Sharing Your Information When Permitted or Required by Federal or State Law

We may share your information with other parties when permitted or required by federal or state law. For example, we share information in order to protect against fraud, report transactions to consumer reporting agencies, respond to subpoenas, and when you ask us to.

We may always share your information as described in this section for Service and Joint Marketing Reasons, and When Permitted or Required by Federal or State Law, even if you ask us not to (even if you opt-out).

Sharing Information About Former Customers

When a FIRST NATIONAL REPOSSESSION account has been closed, information about the account remains in our files. Although we use non-public personal information about former customers less and less over time, the same policies about sharing described above apply to former customers' non-public personal information, and we take exactly the same care in how we collect, use, and protect information about former customers as we do about current customers.

Employee Access to Customer Information

We restrict access to non-public personal information about you to those employees who need to know that information to perform their job at OUR REPOSSESSION COMPANY. Our employees are trained to respect customer privacy and to access customer information only when they have a business reason to know the information. Our employees are subject to discipline for violating our Privacy Policy.

Confidentiality and Security

FIRST NATIONAL REPOSSESSION maintains physical, electronic, and procedural safeguards that comply with federal regulations to guard your non-public personal information.

OUR REPOSSESSION COMPANY Is Committed To Honoring Your Privacy Requests

If you prefer that we not share non-public personal information about you with third parties who are not affiliated with FIRST NATIONAL REPOSSESSION, you may opt out of the sharing. That is, you may direct us not to share the information. If you wish to opt-out of sharing information with third parties who are not affiliated with FIRST NATIONAL REPOSSESSION , contact us.

What Happens If You Opt-Out?

It is important that you understand what information will be affected if you choose to opt-out of sharing.

- **Fair Credit Reporting Act - Information Shared within the OUR REPOSSESSION COMPANY Companies.**

  Under the Fair Credit Reporting Act, you have the right to opt-out of sharing certain non-public personal information within FIRST NATIONAL REPOSSESSION companies.

  If you opt-out, we will not share non-public personal information we obtain from your application or information we obtain from consumer reporting agencies with other FIRST NATIONAL REPOSSESSION companies except that we will continue to share, within the FIRST NATIONAL REPOSSESSION companies, your identification and contact information from your application.

  We will also continue to share, within the FIRST NATIONAL REPOSSESSION companies, information about our experiences or transactions with you. In addition, we will share your information with other FIRST NATIONAL REPOSSESSION companies when you ask us to. This opt-out does not affect our right to share your non-public personal information with companies outside the OUR REPOSSESSION COMPANY companies.

- **Information Shared Outside of the OUR REPOSSESSION COMPANY Companies.**

  You also have the right to opt-out of sharing your non-public personal information with non-FIRST NATIONAL REPOSSESSION companies. If you opt-out we will not share non-public personal information we collect about you described under "What Information We Collect About You" above.

  However, we will continue to share non-public personal information as described under "Sharing Customer Information for Service and Joint Marketing Reasons and When Permitted or Required by Federal or State Law." This opt-out does not affect our right to share your non-public personal information within the FIRST NATIONAL REPOSSESSION companies.

General Information

This Privacy Policy applies to products or services primarily for personal, family, or household purposes offered through the OUR REPOSSESSION COMPANY financial service providers (OUR REPOSSESSION COMPANY companies or OUR

REPOSSESSION COMPANY affiliated companies):

1st National Repossession.com, Inc.

Collateral Manager, LLC

The practices contained in this policy are subject to change.