

Star Bank of Texas

Privacy Policy and Disclosure

The directors, management, and staff of Star Bank of Texas are concerned about and respect the privacy of customers' personal financial information. We understand that our customers furnish sensitive information to the bank in the course of daily business, and the bank is committed to treating such information responsibly. We know that our customers expect privacy and security for their personal and financial affairs.

The bank will use its best efforts to safeguard sensitive information that has been entrusted to us by our customers. The following privacy policy and disclosure outlines our bank's practice regarding personally identifiable financial information for consumers and those consumers who become our customers. We will provide a privacy notice to each person who opens an account or applies for credit at our bank. We will use the model form (see Exhibit A) published by the agencies to enjoy the safe harbor for notice contents. In addition, we will mail a copy of this privacy notice to each customer on an annual basis.

TYPES OF INFORMATION THE BANK COLLECTS

At Star Bank of Texas, we collect nonpublic, personal information about you from many sources, including the following:

- Information we receive from you on applications or other forms
- Information about your transactions with us, our affiliates, or others
- Information we receive from a consumer reporting agency

Nonpublic, personal information does *not* include that which is available from government records, widely distributed media, or government-mandated disclosures.

TYPES OF INFORMATION THE BANK DISCLOSES

The bank does not now, nor does it intend in the future, to disclose any personal financial information to any nonaffiliated or affiliated third party. By law the bank may disclose certain personally identifiable information without allowing consumers the right to opt out of the bank's sharing agreements in the following circumstances:

- To companies who perform transaction processing for the bank in the following circumstances:
 - If the transaction, service, or product is requested or authorized by the consumer
 - To maintain or service a consumer's account as part of a private label credit card or other loan extension program
 - In connection with a securitization, secondary market sale (including servicing rights), or similar transaction related to a consumer
- To disclose information necessary to enforce the bank's legal or contractual rights or the rights of any other person who is engaged in the financial transaction
- To disclose information required in the ordinary course of banking business, such as the settlement of claims or benefits, the confirmation of information to the consumer or the consumer's agent, and the billing, processing, or clearing of items in the normal course of business
- To provide information to insurance rate advisory organizations, guaranty funds or agencies, agencies that are rating the bank, persons who are assessing the bank's compliance with industry standards, and the bank's attorneys, accountants, and auditors
- To the extent permissible under the Right to Financial Privacy Act
- To a consumer reporting agency under the Fair Credit Reporting Act

- To comply with federal, state, or local laws, rules, and other applicable legal requirements

SAFEGUARDING CUSTOMER INFORMATION

At Star Bank of Texas, we protect consumer privacy by ensuring that only employees who have a business reason for knowing information have access to it. The bank has appointed the Compliance Officer as a financial privacy coordinator, who is responsible for maintaining internal procedures to ensure that our customers' information is protected.

All employees will receive a copy of this policy and are trained at least annually regarding the importance of safeguarding customer information. The appropriate officer will take disciplinary action against any employee who violates the bank's privacy policy and procedures.

If we change our policy or practice by, for example, adding a category of information that we will disclose to a third party, we will notify existing customers and give them an appropriate time period to opt out of the disclosure.

HOW TO FILE A COMPLAINT

The Star Bank of Texas is chartered under the laws of the State of Texas and by state law is subject to regulatory oversight by the Texas Department of Banking. Any consumer wishing to file a complaint against Star Bank of Texas should contact the Texas Department of Banking.

Star Bank of Texas also engages in the money transmission and/or currency exchange business as an authorized delegate of American Express under Chapter 151 of the Texas Financial Code. If you have a complaint, first contact the consumer assistance division of American Express at 1-800-447-7677. If you still have an unresolved complaint regarding the company's money transmission or currency exchange activity, please direct your complaint to the Texas Department of Banking.

Consumers may file complaints with the Texas Department of Banking by contacting the department through one of the means indicated below:

In Person or U.S. Mail:	Texas Department of Banking 2601 N Lamar Boulevard, Ste 300 Austin, Texas 78705-4294
Telephone Number:	1-877-276-5554 (toll free)
Fax Number:	1-512-475-1313
Email Address:	consumer.complaints@dob.texas.gov
Website Address:	www.dob.texas.gov

EXHIBIT A



Rev. December 2010

FACTS	WHAT DOES STAR BANK OF TEXAS 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ● Social Security number ● Income ● Account balances ● Payment history ● Transaction history ● Credit history <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
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 Star Bank of Texas chooses to share; and whether you can limit this sharing.	
	Reasons we can share your personal information	Does Star Bank of Texas share?
	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
	For our marketing purposes - to offer our products and services to you	No
	For joint marketing with other financial companies	No
	For our affiliates' everyday business purposes - information about your transactions and experiences	No
	For our affiliates' everyday business purposes - information about your creditworthiness	No
	For nonaffiliates to market to you	No
	Can you limit this sharing?	No
Questions?	Call 817-238-7827	

What We Do	
How does Star Bank of Texas 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. 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 does Star Bank of Texas collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ● Open an account ● Use your credit or debit card ● Apply for financing ● Provide account information ● Give us your contact information We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <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 nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ● <i>Star Bank of Texas has no affiliates.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ● <i>Star Bank of Texas does not share with nonaffiliates so they can market to you.</i>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ● <i>Star Bank of Texas does not jointly market.</i>

Other Important Information	
<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 either for them to market to you or for joint marketing - without your authorization, and we will not share personal information with affiliates about your creditworthiness without your authorization.</p> <p>For Texas Customers. The Star Bank of Texas is chartered, licensed or registered under the laws of the State of Texas and by state law is subject to regulatory oversight by the Texas Department of Banking. Any consumer wishing to file a complaint against the Star Bank of Texas should contact the Texas Department of Banking through one of the means indicated below: In person, or by U.S. Mail: 2601 North Lamar Boulevard, Suite 300, Austin, Texas 78705-4294; Telephone No. (877) 276-5554; Fax No. (512) 475-1313; E-mail: consumer.complaints@dob.texas.gov; Website: www.dob.texas.gov.</p>	