First Command Privacy Policy and Notice of ATM/Night Deposit Facility User Precautions

FIRST COMMAND PRIVACY POLICY

The First Command Privacy Policy is designed to explain what type of information we collect, how it is used, and with whom and under what circumstances it will be shared. Current clients will receive a copy of the First Command Privacy Policy on an annual basis. Additionally, it is available on the Internet at www.firstcommmand.com and www.firstcommandbank.com.

The First Command Privacy Policy applies to First Command Financial Services, Inc., and its wholly owned subsidiary companies, including First Command Financial Planning, Inc., First Command Advisory Services, Inc., First Command Insurance Services, Inc., First Command Bank and First Command Europe Ltd. (together the "First Command Family of Companies").

If you have any questions about the privacy, security and protection of your information, you may write to the First Command Legal and Compliance Department, Attn. Privacy Policy, 1 FirstComm Plaza, Fort Worth, TX 76109-4999 or call 800-443-2104.

This notice replaces any previous notices provided to you by us about the privacy, security and protection of information. We may amend this notice at any time. We will inform you of changes as required by law.

A. Collection of Information

We collect information about you to provide you with superior customer service, save you time, better respond to your needs, and manage our business and risks. We collect information about you from the following sources:

- Directly from you on forms, applications, and other similar documents; via the Internet; by telephone; or otherwise. Examples of this type of information include your name, address, names of family members, marital status, Social Security Number, employment information, and financial situation, etc.
- From transactions with us or with companies through which we provide you products and services. For example, account balances, holdings, and history (bank, mutual fund, annuity, etc.); insurance coverages, limits, rates, beneficiaries, and claims history.
- From consumer report agencies, such as information relating to your creditworthiness, your credit score, credit usage, and claims history.
- From third parties to verify the information you have given us and protect against fraudulent activity as required by law.

B. Protecting Your Information

Keeping your information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards that comply with federal regulations to protect your information. We limit access to customer information to those employees and others who have a business reason to know this information. We maintain strict internal policies against unauthorized disclosure or use of client information. Even if you are no longer a customer, we will treat your information in the same manner as if you were still a customer.

C. Information Sharing With Third Parties

Individuals or companies outside the First Command Family of Companies are considered third parties. We will not share your information with third parties so they may market their products to you. Accordingly, you do not need to tell us to refrain from sharing your information with third parties. We may share the information we collect about you with third parties only as permitted or required by law. For example, we may share information:

- With service providers that assist us with a variety of business activities, including marketing on our behalf, customer service, account administration, online support and research.
- To protect against or prevent actual or potential fraud, unauthorized transactions, claims, or other liability.
- To process your requests or provide services regarding a financial product or service you request or authorize (such as mutual funds, financial planning services, insurance, deposit accounts, loans, credit cards, etc.). Companies with whom we may share your information in this regard include mutual fund companies, insurance companies, banks, and transfer agents which maintain your accounts.
- With government entities in response to subpoenas or regulatory requirements.
- With consumer reporting agencies and/or credit bureaus.
- Pursuant to your written consent.

All third parties with whom we share your information are required to protect the confidentiality of the information provided by us and may only disclose such information as permitted by law.

D. Information Sharing Within the First Command Family of Companies

The reason you share your information with us is so that we may use your information to determine whether the investment, insurance and banking products and services we offer are a good fit for you and to provide you with recommendations and service for these products and services. In order to accomplish this objective and provide the recommendations and services you request, we share your information within our Family of Companies to ensure that the recommendations and services we provide consider your complete financial picture and complement each other.

Federal law allows you to direct us (1) not to share information about your creditworthiness received from you or others within our Family of Companies, and/or (2) not to market products or services to you based on information received from one of our other companies. These limitations may not apply in certain circumstances permitted by law, such as if you already have a pre-existing relationship with the company desiring to market its products or services to you. Importantly, should you choose to exercise your right to limit our ability to share your information among our Family of Companies, we will be unable to establish or continue a relationship with you as your choice will limit our ability to serve you as discussed above.

With this in mind, if you desire to inform us of your choice, you may write to: First Command Legal and Compliance Department, Attn. Privacy Policy, 1 FirstComm Plaza, Fort Worth, TX 76109-4999 or call 800-443-2104. Your decision will not expire until you revoke it in writing. If you have a joint account, your direction will apply only to you unless you specifically state that your direction is on behalf of all joint account owners.

E. Protecting Medical and Health Information

We do not share any medical or health information with third parties or within the First Command Family of Companies, except as necessary to process transactions or services you have requested or initiated or as otherwise permitted by law. For example, we may share medical or health information you have provided to us in connection with an insurance application with insurance companies to determine your eligibility or for underwriting purposes.

F. Online Security Policy

For information regarding our online security practices we invite you to review our Online Security Policy at www.firstcommand.com or www.firstcommandbank.com.

G. Making Sure Your Information Is Accurate

You have the right to review the information we have collected about you to ensure that it is accurate and current. You can also request corrections to any personal information maintained by us.

To review the information we collect about you, submit a request in writing to the First Command Legal and Compliance Department, Attn. Privacy Policy, 1 FirstComm Plaza, Fort Worth, TX 76109-4999.

You must describe the kind of information you want to review and include your full name, address, telephone number and date of birth. Upon receipt of your request, we will contact you within 30 business days to describe what information is available for your review. We will not provide information that we feel is privileged.

To correct information about you, send a written request as described above, explaining your desired correction. Upon receipt of your request, we will contact you within 30 business days to inform you whether we will make the correction or tell you why we will not. We cannot correct consumer report information, such as your credit report. To do this, you must contact the consumer report agency that provided it.

NOTICE OF ATM/NIGHT DEPOSIT FACILITY USER PRECAUTIONS

As issuers of Automated Teller Machine (ATM) access devices, we have provided for your information a list of safety precautions regarding the use of automated teller machines. Please read the following safety precautions:

1. Prepare for your transactions at home (for instance, by filling out a deposit slip) to minimize your time at the ATM or night deposit facility.
2. When using unmanned walk-up or drive-up automated teller machines (ATMs):
    a. Remain aware of your surroundings, particularly at night, and exercise caution when withdrawing funds;
    b. Inspect an ATM before use for possible tampering, or for the presence of an unauthorized attachment that could capture information from the access device or your Personal Identification Number (PIN);
    c. Remember, do not leave your card at the ATM. Do not leave any documents at a night deposit facility;
    d. Refrain from displaying cash and put it away as soon as the transaction is completed; and
    e. Wait to count cash until you are in the safety of a locked enclosure, such as your car or home.
3. Do not reveal your personal identification number (PIN) to others. Avoid allowing others to view your PIN entry into an ATM. Memorize your PIN and do not write your personal identification number or code on your ATM access device.
4. Safeguard and protect your access device. Treat it as if it were cash, and if it has an embedded chip, keep the device in a safety envelope to avoid undetected and unauthorized scanning.
5. Don't accept assistance from anyone you don't know when using an ATM or night deposit facility.
6. Promptly report a lost or stolen access device and report all crimes to law enforcement officials immediately.
7. If you observe suspicious persons or circumstances while approaching or using an ATM, do not use the machine or, if you are in the middle of a transaction, cancel the transaction, take the access device, leave the area, and come back another time or use an ATM at another location.
8. At a drive-up facility, make sure all the car doors are locked and all of the windows are rolled up, except the driver's window. Keep the engine running and remain alert to your surroundings.
9. We want the ATM and night deposit facility to be safe and convenient for you. Therefore, please tell us if you know of any problem with a facility. For instance, let us know if a light is not working or there is any damage to a facility. Please report any suspicious activity or crimes to both the operator of the facility and the local law enforcement officials immediately.
10. Safeguard and securely dispose of ATM receipts.
11. Do not surrender information about your access device over the telephone or over the Internet, unless to a trusted merchant in a call or transaction initiated by you.
12. Promptly review your monthly statement and compare ATM receipts against your statement to protect against ATM fraud.
13. If purchasing online with the access device, end transactions by logging out of websites rather than simply closing the web browser to protect against Internet fraud.

1 FirstComm Plaza, Fort Worth, Texas 76109-4999
P.O. Box 901041, Fort Worth, Texas 76101-2041
1.888.763.7600
Overseas, call 1.817.763.0000
Firstcommandbank.com

814-E (11/15) 11205