

The following is a list of First Banks' affiliates and family of financial companies affiliated through common ownership as of January 31, 2009 with which consumer information may be shared. This list may change at any time and we will inform you of any changes, as required by law.

First Bank
First Bank a/k/a:
First Bank, D/B/A First Bank Mortgage
First Bank a/k/a:
First Bank, D/B/A FB Home Mortgage
First Bank a/k/a:
First Bank, D/B/A First Banc Mortgage, Inc.
First Bank a/k/a:
First Bank, D/B/A First Banc Mortgage
First Bank,
D/B/A First Priority Mortgage Company
First Bank a/k/a:
First Bank, D/B/A First Bank, Inc.
First Bank,
D/B/A First Bank Leasing
First Bank,
D/B/A First Bank Missouri
FB Holdings, LLC
First Bank Business Capital, Inc.
Missouri Valley Partners, Inc.
First Land Trustee Corporation
First Capital America, Inc.
First Services, L.P.
First Brokerage America, LLC
Small Business Loan Source LLC
Adrian N. Baker & Company
Universal Premium Acceptance Corporation
Universal Premium Acceptance Corporation,
D/B/A UPAC
Universal Premium Acceptance Corporation,
D/B/A Preferred Finance Corporation
UPAC of California, Inc.

First Brokerage America LLC
135 N. Meramac
Clayton, MO 63105

**FIRST
BROKERAGE
AMERICA** 
LLC - A non-bank affiliate of

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Privacy Policy for Consumers

A Commitment to Protect
Your Customer Information

At First Banks, Inc., its subsidiary banks and family of financial companies affiliated through common ownership, we recognize that you have placed your trust in us ... and that preserving your trust is one of the core values of our institution. This is the reason we are committed to the responsible use and protection of your customer information.

Here is a summary of our privacy guidelines:

- We will maintain the confidentiality of our customers' personal information.
- We will hold our employees to the highest standards of conduct in ensuring this confidentiality.
- We will use information responsibly to provide our customers with benefits, improved products and services.
- We will comply with federal and state privacy laws and regulations.
- We will establish procedures to maintain accurate information and respond in a timely manner to our customers' request to update or correct information.
- We will use a combination of safeguards to protect our customers' information against unauthorized access.
- We will require the companies with which we do business to abide by our privacy policy and to maintain the confidentiality of customer information.

Please read through this brochure to learn more about our privacy policy and how we use and protect your customer information.

1-800-715-3242
www.firstbrokerageamerica.com

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HOW WE USE INFORMATION

We use customer information in the ordinary course of serving your relationship or managing our business. For example, we use your information to:

- Identify you and protect you from fraud, so that others cannot use your accounts without authorization.
- Process your requests, such as purchases, ATM/Debit Card withdrawals or loan applications.
- Inform you of additional financial services to meet your individual needs.
- Service your accounts, issue your account statements, checks and ATM/Debit Cards.

HOW WE COLLECT INFORMATION

In the process of serving your financial needs, we collect a limited amount of “nonpublic personal information” which can include information about your finances and customer relationship. We may disclose all of the information that we collect, as described below. This customer information helps us better serve your accounts and understand your needs, and may come from a variety of sources, including:

- Information we receive directly from you, on applications and other forms;
- Information we receive through your transactions or experiences with us, our affiliates, or others; and
- Information we receive from consumer reporting agencies.

If you are an Internet user, we may use the information collected about you to provide you with information that may be of interest to you. When accessing our Web site at www.firstbanks.com, this Privacy Policy is available for you to read there also.

HOW WE SHARE INFORMATION

We strictly limit the sharing of nonpublic personal information both within and outside of the First Banks, Inc. family of financial organizations as follows:

Within the First Banks, Inc. family:

Our affiliates are the subsidiary banks and financial companies listed in this brochure, and are part of the First Banks, Inc. family, being related or affiliated by common ownership or affiliated by common corporate control.

Our affiliates may share a limited amount of nonpublic personal information internally, as required or permitted by law, so that we can serve you more efficiently; offer you new services, such as mortgages, insurance and investments; and reduce the amount of information you are required to provide when you contact us.

With selected outside companies:

We may disclose the following information to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint-marketing agreements:

- Information we receive from you on applications or other forms, such as your name, address, social security number, date of birth and telephone number; and
- Information about your transactions with us, our affiliates, or others, such as your account number, payment amount, and account balance.

This enables us to provide quality service to you and offer you additional financial services that may be of value to you. These arrangements are subject to strict standards of confidentiality and security and are subject to federal and state law. The information we provide is limited to that which we reasonably believe they “need to know” to provide their contracted services.

In addition, we may disclose nonpublic personal information to third parties as permitted by law. For example, we might be required to disclose information about you in response to a subpoena or to credit bureaus or under certain federal or state laws. Or we may provide information to others with your consent, for example to complete a transaction that you have initiated.

SECURITY PROCEDURES IN PLACE

We have implemented procedures and guidelines to safeguard the privacy of nonpublic personal information from unauthorized use or improper access. We will continue to enhance our security procedures, as new technologies become available. Our employees are governed by a code of conduct and are educated about our privacy policies, and about the importance of maintaining the confidentiality of customer information.

ADDITIONAL MEASURES TO PROTECT YOUR CUSTOMER INFORMATION

- If medical information is collected in the course of providing insurance services to you, this information will not be used for any purpose except as you have authorized.
- We strive to maintain complete and accurate information about you and your accounts. If you believe that our records contain inaccurate or incomplete information, please notify us. We will investigate and correct any inaccuracies.
- Our policies for protecting nonpublic personal information apply to customers with a current or former relationship for personal, family or household purposes.

IN CLOSING ...

Rest assured we will keep your information confidential.

We will protect your privacy automatically, every day, without requiring any action on your part. We want you to know that you can trust us – not only to keep your information confidential, but also to provide you with the financial advice and services you need today and in the years to come. Thank you for the opportunity to serve your financial needs.

This policy is provided to you in accordance with the privacy provisions in Title V of the Gramm-Leach-Bliley Act. We may change this policy from time to time, and we will provide an annual notice of our policy to customers with an ongoing relationship.