

Consumer Online Privacy Policy

Effective June 1, 2009

Vectra Bank Colorado (“we”) respects your desire for privacy and is committed to maintaining the confidentiality of your personal financial information. This document outlines our privacy policy for visitors to our web site, as well as for consumers who have a continuing relationship with us, such as a deposit account, loan, safe deposit box or brokerage account.

Visitors to Our Web Site. Visitors to our web site remain anonymous, unless they register for a service or otherwise elect to disclose their identity to us. Although we do not collect personally identifying information about persons who simply visit our site, we do collect certain limited information about visitors, such as their IP address (a numeric address assigned automatically to computers when they access the Internet). We also may place “cookies” on a computer to track a visitor’s use of our web site. A cookie is a piece of data that is stored on your hard drive. It takes up very little room on your system and helps us to customize our site and make its navigation easier for you. We sometimes use cookies to help estimate the number of visitors to our site and to determine which areas are the most popular. Unless you register with us for a service (such as our online banking service), the cookie does not provide us with any personally identifying information about you, such as your name or address.

Our Collection of Information About You. We may collect nonpublic personal information about you in order to understand your needs, administer our business, process transactions, and provide you with products and services. We obtain nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms (such as your name, address, social security number, assets and income);
- Information about your transactions with us, our affiliates, or others (such as your account balance, payment history, parties to transactions, and credit usage); and
- Information we receive from a consumer reporting agency (such as your creditworthiness and credit history).

Our Disclosure of That Information.

- *Joint Marketing Arrangements* – We may disclose some or all of the information we collect, as described above, to nonaffiliated financial institutions with whom we have joint marketing agreements, such as securities broker-dealers, insurance agents and card issuers, so that they can market goods and services to you.
- *Our Service Providers* – We may disclose some of the information described above, such as your name and address, to companies that perform marketing and other services on our behalf (e.g., to companies that assist us with mailings).
- *Use by Affiliated Companies for Non-Marketing Purposes* -- We may provide information regarding our experience and transactions with you to financial service providers (e.g., financial institutions, securities broker-dealers, and insurance agents) and others (e.g., Zions Bancorporation and Zions Management Services Corporation) with which we are related by common ownership or affiliated by corporate control (“*affiliates*”). Our affiliates currently include those listed below.

We also may share other information we obtain about you with our affiliates (e.g., information from applications and credit reports), unless you notify us before the information is initially communicated that you do not want us to share that information. You can tell us not to share such information by calling us at 1-866-299-3340.

- *Use by Affiliated Companies for Marketing Purposes* -- Some or all of the information described above that we provide to our affiliates may be used by them to market products and services to you.

You may limit our affiliates, such as our bank, credit card, insurance, and securities affiliates, from marketing their products or services to you based on your personal information that we collect and share with them. This information includes, for example, your income, your account history with us, and your credit score.

Your choice to limit marketing offers from our affiliates will apply for at least 5 years from when you tell us your choice. Once that period expires, you will receive a renewal notice that will allow you to continue to limit marketing offers from our affiliates for at least another 5 years. If you have already made a choice to limit marketing offers from our affiliates, you do not need to act again until you receive the renewal notice.

To limit marketing offers, contact us by telephone at 1-866-299-3340.

- *Others* -- We may disclose information about you, your accounts and transactions: (a) where it is necessary or helpful to effect, process or confirm your transactions; (b) to verify the existence, history and condition of your account for credit reporting agencies; (c) to comply with legal process, such as subpoenas and court orders; (d) to law enforcement authorities if we believe a crime has been committed; (e) if you give us your consent; and (f) as otherwise permitted by law.

We do not disclose nonpublic personal information about our current or former customers to others, except as set forth in this policy.

State Rights. Depending on where you live, you may have additional privacy protections under some state laws. For example, certain state laws may restrict the types of information we may disclose about you, limit the parties with whom we may share such information, or require us to provide you with additional notices or opt-out rights. We will comply with applicable state laws before sharing nonpublic personal information about you. We may do this by sending a separate notice of those rights to you.

Maintaining Accurate Information. We have procedures in place that help us to maintain the accuracy of the personally identifiable information that we collect. Please contact your branch of account, representative or call our customer service center at 1-800-232-8948 if you believe that our information about you is incomplete, out-of-date, or incorrect.

Information Security. We restrict access to nonpublic personal information about you to those employees who have a need to know such information (e.g., to process your transactions or provide services to you). We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Links to Other Web Sites. Our web site may feature links to third party web sites that offer goods, services or information. Some of these sites may appear as windows-within-windows at this site. When you click on one of these links, you will be leaving our site and will no longer be subject to this policy. We are not responsible for the information collection practices of the other web sites that you visit and

urge you to review their privacy policies before you provide them with any personally identifiable information. Third party sites may collect and use information about you in a way that is different from this policy.

Services and Advertisements by Third Parties. Third parties may offer services from time to time at our web site. If you provide them with information, their use of that information will be subject to their privacy policy, if any, and will not be subject to this policy. If you accept third party goods or services advertised at our web site, the third party may be able to identify that you have a relationship with us (e.g., if the offer was only made through our site).

Minors. We feel strongly about protecting the privacy of children and teenagers. As such, we do not knowingly collect personally identifiable information from minors through our web site.

Changes to this Policy. We may add to, delete, or change the terms of this Privacy Policy from time to time by posting a notice of the change (or an amended Privacy Policy) at this web site. If required by law, we will send you a notice of the change. Your continued use of our web site or any online service following notification will constitute your agreement to the revised Policy.

Questions. If you have any questions regarding this Policy, you can call us at 1-866-299-3340.

List of Affiliates:

Zions Bancorporation	Amegy Investments, Inc.
Amegy Bank	Amegy Mortgage Company, LLC
California Bank & Trust	Contango Capital Advisors, Inc.
National Bank of Arizona	Exchange Services, LLC
Nevada State Bank	NetDeposit LLC
The Commerce Bank of Oregon	Welman Holdings, Inc.
The Commerce Bank of Washington	Welman Services, Inc.
Vectra Bank Colorado	Western National Trust Company
Zions First National Bank	Zions Credit Corporation
Zions Management Services Company, Inc.	Zions Direct, Inc.
Amegy Insurance Agency, Inc.	Zions Insurance Agency, Inc.

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