



CUSTOMER PRIVACY POLICY

At NOVA, we understand and respect the privacy of our valued customers, and your trust is the hallmark of our relationship. We will protect our customer's privacy and continue to offer a wide array of products while maintaining the highest level of customer service.

The following information describes how employees of NOVA collect, use, and retain customers' and former customers' nonpublic information. The security and protection of this information is a priority of NOVA.

We, our, and us, when used in this notice, mean NOVA Financial Holdings, Inc., NOVA Bank, and NOVA Financial Services Inc. When we use the words "you" and "your" we are referring to customers who have a continuing relationship with us by purchasing or holding various financial products and services offered through NOVA Bank, and NOVA Financial Services, Inc.

Nonpublic personal information means information about you that we collect in connection with providing a financial product or service to you. Nonpublic information does not include information that is available from public sources, such as telephone directories or government records.

WHAT INFORMATION WE COLLECT AND MAINTAIN

We may collect "nonpublic personal information" about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with others or us;
- Information we receive from third parties, such as consumer reporting agencies.

We will collect, retain and use personal information from our customers in order to provide products and services requested by our customers. We will limit the use and collection of personal information about customers, to that which is necessary to administer our business; provide exceptional customer service; comply with certain laws and regulations; and allow us to offer opportunities that we think will be of interest to our customers. Our employees will explain why we are collecting your information as well as how the information will be used and retained.

WHAT INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

We may disclose nonpublic personal information about you to the following types of affiliated and nonaffiliated third parties as follows:

- NOVA Financial Services, Inc— an affiliate of NOVA Bank. We will not share any information with NOVA Financial Services, Inc. beyond what is permitted by law without your prior consent;
- Certain third parties provide services or functions for us that require your nonpublic personal information. We provide these third parties with only the information they need to properly complete their services or functions and we have a contractual agreement with that third party that requires that third party to maintain the confidentiality of your nonpublic personal information;
- We may disclose all of the information we collect, as described above to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.
- We do not sell customer information to outside parties.

SECURITY INFORMATION

Our Board of Directors, Officers and Employees are committed to the security of our customer's financial and personal information. All of our operational and data processing systems are in a secure environment that protects your account information from being accessed by third parties. We maintain physical, electronic and procedural safeguards that comply with Federal standards to guard your nonpublic personal information. Our employees will maintain our customers' financial and personal information in a secure manner and will follow our internal security standards at all times.

At NOVA, employee access to personally identifiable customer information is limited to those employees with a business reason to know our customers' information. Employees responsible for maintaining the confidentiality of our customers' information will only use this information to provide you with the highest level of customer service available.

This policy is subject to change. We will notify you of any changes. Any future changes will affect existing and future customers.