

Access Group, Inc. Privacy Policy

Our privacy policies

Keeping customer information secure, and using it only as our customers would want us to, is a top priority for all of us at Access Group, Inc. Here are our policies in brief:

- We will impose strict standards of security and confidentiality and maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard any information you share with us. (For a summary of our Web site information collection and security procedures, go to www.accessgroup.org, and click on "Privacy.")
- We will limit the collection of your information to the minimum required to administer our business and restrict internal access to your nonpublic personal information to authorized, trained employees on a "need to know" basis. Employees who violate our privacy policies will be subject to our normal disciplinary process.
- Whenever we hire other organizations to provide support services, we will require them to conform to our privacy standards with respect to information you have provided us and to allow us to audit them for compliance.
- We will not reveal your information to other companies that may want to sell their products or services to you. For example, we will not sell your name to a catalogue company.
- We may amend our privacy policy from time to time. As required by law, we will send our current customers our most recent privacy notice at least annually.
- All of our privacy policies apply to our former customers as well as our current customers.

What information do we collect about you?

"Nonpublic personal information" (NPI) is information about you that we obtain in connection with providing a financial product or service. Such information includes, for example, your Social Security number and loan balance, and, once you have begun repaying your loan, your repayment history. We collect nonpublic personal information about you from the following sources:

- The loan applications or other forms that you fill out, which provide us with most of the information we use, such as your name, address, social security number, school, and course of study.
- Your school, which confirms your enrollment status and eligibility for student loans.

- Reputable national consumer credit reporting agencies, which report on your credit history.
- Information that we collect about your transactions with us and our affiliates, such as your loan balance, repayment history and any other parties involved in your transactions, such as a cosigner.

With whom do we share information about you?

Access Group does not disclose nonpublic personal information about you to any entities except as permitted by federal law, specifically the Gramm-Leach-Bliley Act and the Fair Credit Reporting Act. For instance:

- A. As permitted by law, we may share all of the information we collect about you, as described above, with our affiliates described below and with companies that provide marketing services on our behalf.
- B. By law, as needed for the purpose of offering, processing, servicing, and collecting loans, we may disclose your nonpublic personal information to other parties in the student lending business, such as guarantors, lenders, loan servicers, the Department of Education, credit bureaus, and schools. Under the agreements that govern the Access Group Loan Program, only Access Group may use nonpublic personal information about applicants or borrowers, except as may be necessary for the other participants to perform their respective roles.

We are required by law to disclose certain information about you (such as information related solely to our experiences or transactions with you) to credit bureaus and regulatory agencies, such as the Federal Trade Commission, and to comply with legal requirements, such as when subpoenaed for a fraud.

Who has adopted these privacy policies?

The following organizations have adopted these privacy policies: Access Group, Inc., which administers the loan program and may own or may in the future purchase your loan(s); Access Group Loan Reserve Trust 1, which acts as a loan reserve and purchases certain defaulted loans; Affiliated Loan Program for Students School Trust 2009-1; PEAKS Trust 2009-1; and Access Funding ABCP-1 LLC. Throughout this document, the term "we" refers to the participants identified above, collectively.

