

AHP Online: Guide for Member Applicants

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Introduction

Members of the Federal Home Loan Bank of Des Moines (the "Bank") and Project Sponsors they will support in making an application for the Affordable Housing Program (AHP) grant must utilize AHP Online, the Bank's automated system for making application to AHP. The member assigns staff access to AHP Online through eAdvantage, the exclusive reporting system to the Bank. Member staff then may access AHP Online at https://ahp.fhlbdm.com. Member staff assigned this access is identified as an AHP User. This person must review and approve a Project Sponsors application in AHP Online.

All members who plan to support an AHP application should take the steps necessary to access eAdvantage if they have not already done so. Once the member has eAdvantage access, their eAdvantage Administrator must assign at least one AHP User in order for a Project Sponsor to initiate an application in AHP Online. For assistance gaining access to eAdvantage, please contact the Service Desk at 800-544-3452, ext. 2555.

AHP Project Sponsors and consultants ("AHP Participants") must register for AHP Online access separately in that system and may only initiate an application after associating the application with an AHP User assigned by the member. Thus, an AHP application cannot be initiated without member support. Pursuant to the Code of Federal Regulations (12 C.F.R. Part 1291) (the "AHP Regulations"), the Affordable Housing Program Implementation Plan (the "Plan") sets forth certain policies, guidelines, and requirements applicable to the Bank's AHP. The Plan is posted on the Bank's public website at <u>www.fhlbdm.com</u>. See <u>Affordable Housing</u>. Bank members and AHP Participants are encouraged to review the Plan.



AHP Participant

A representative of an AHP Project Sponsor or a consultant registered as an AHP Online User.

AHP User (Member Contact)

An AHP User is an employee of the member who is assigned by the member's eAdvantage Administrator to have AHP Online access allowing the AHP User to complete and "Member Approve" AHP applications.

eAdvantage

The member's exclusive integrated reporting system to the Bank. This system contains realtime reporting, point-in-time Statement reporting, and transaction functions. This system will be used by the member's eAdvantage Administrator to establish an AHP User who will have access to the AHP Online application for review and submission to the Bank.

eAdvantage Administrator

An eAdvantage Administrator is a staff person at a member with permissions to utilize eAdvantage to conduct business with the FHLB Des Moines. This person can also be assigned as AHP User, at the member's discretion.

Input Contact

3

An employee or representative of the Project Sponsor, or a consultant or representative of another organization working with the Project Sponsor, who may complete an AHP application. The Input Contact may initiate and complete an AHP application but is unable to edit contact screens or Sponsor Approve an AHP application. AHP Online allows at most three (3) Input Contacts for any application.

Consultants and representatives of non-sponsor organizations should always be identified as an Input Contact. An individual may be identified as an Input Contact for multiple applications.

Member

The FHLB member institution identified as the member sponsor and contact. The member participates in and supports the application for an AHP project by a Project Sponsor. For an application to be complete it must be approved by the member's AHP User.

Lead Sponsor Contact

The Lead Sponsor Contact is an employee of the Project Sponsor organization, or of an entity that wholly owns and/or controls the Project Sponsor organization, who has the knowledge and authority to respond to inquiries and make decisions related to this application and project. At least one (1) and at most two (2) Lead Sponsor Contacts from the same organization must be assigned for each application.

Project Sponsor (aka Sponsor)

The Project Sponsor is the organization responsible for and conducting the AHP project. Sponsors that are a nonprofit organization, a state or political subdivision of a state, a state housing agency, a local housing authority, a Native American Tribe, an Alaskan Native Village, or the government entity for Native Hawaiian Home Lands are considered in awarding points. Other entities, including forprofits, may sponsor an application and receive AHP funding but cannot receive points for such sponsorship.



eAdvantage					
This is a secured si	ite for customers of the Federal Home Loan Bank of Des Moines.				
U	Jser ID				
P	Password				
	Login				
	Reset your password				
	Signup for eAdvantage				
	Frequently Asked Questions				
Remove or Add a User Administrator					
For optimum performance, the Bank recommends the use of Internet Explorer 9.0 or higher.					
	Terms and Conditions of Use Privacy Policy Discialmer thibdm.com				

What is an eAdvantage Administrator's role in AHP Online?

An eAdvantage Administrator is responsible for the setup, modification, deletion, and password resets for accounts within eAdvantage. The eAdvantage Administrator is responsible for assigning AHP Users for AHP Online and establishing a User ID and Password for that person or persons to access that system. Instruction is provided in a "Guide to eAdvantage" in that system., and is summarized here.

If you require assistance identifying or setting up an eAdvantage Administrator, please contact the Service Desk at 800-544-3452, ext. 2555, or email <u>ServiceDesk@fhlbdm.com</u>.



Registering an Authorized AHP User

To register a member's AHP User the eAdvantage Administrator should follow the instruction found in the "Guide to eAdvantage". The Guide is found on the eAdvantage Home page. In the Guide look for "Authorization Levels" in the Appendix for instruction on adding Users. For AHP Online access the eAdvantage Administrator must authorize a user for the **Affordable Housing Program (AHP) Online.**

n eAdvantage		Сса
Holime Account - Line of Business - Statements Cust. Select	Settings Multibank	Logou
Urgent Messages		
2022 Holiday Hours The holiday season is upon us and with that comes amended hours. Please clic at 800.544.3452, ext. 2200	k here to view our complete list of special holiday hours. If you have qu	estions, please contact the Member Service Team
	k2	
Links		
You have 200 notifications*	APF Improved: Administrator Guide to eAdvant	age
APF Improved: FAQ for eAdvantage Administrators	APF Improved: User Management for eAdvant	age Administrators
APE Improved: eAdvantage Administrator Euroctions	Advance Rates	
Affordable Housing Program (AHP) Online	Amortizing Advance Rate Calculator	
Balance Confirmations	Collateral Pledge	
Contact Usl	Cut-off Statements	
Down Payment / Set Aside Program Online	Educational Resources	
Fee Schedule	Frequently Asked Questions (FAQ)	
Guide to eAdvantage	Install Trusted Root CA	
Mortgage Partnership Finance®	Safekeep Direct Resources	
Wire Transfer Forms	eMPF Website	

The eAdvantage Administrator will go to User Administration/Add User to designate the AHP User. Identify an AHP User, who should be from member staff. **Do not identify a person associated with the Project Sponsor as AHP User.** Project Sponsors will register their own staff as AHP Participants in AHP Online, in a separate process.

To assign the member's AHP User, the eAdvantage Administrator must:

- Identify the AHP User and assign a User ID this may also be the eAdvantage Administrator
- Enable the User

- Show User Type as Affordable Housing Program (AHP) or Down Payment/Set Aside Program
- In Community Investment, designate Affordable Housing Program (AHP) Access



Home Account ~ Line of Business ~	Statements	Settings +	Admin				Logout
HOME / USER ADMINISTRATION / ADD USER							
Add User							
Requested User ID*		First Name*			Last Name*		
Phone Number*	Extension	Cell Phone O			Email Address*		
Address 1	^	Address 2			City	State	Zip
7th St & Ave G		PO Box 329			Fort Madison	IA	52627-0329
Title* 0							
User Status				User Type			
Enabled				# eAdvantage			
 Disabled 				 Affordable Housing Progra 	m (AHP) or Down Payment / Set	Aside Prog	ram
Advances Advances							
Authorizations							
Deposit Account Funds transfer							
Collateral							
BBC Submission BBC Submission	BBC Submission Loan Listing Submission Loan Listing Submission						
- Germana Ganuasara A							
Community Investment							
Affordable Housing Program (AHP) Access	•			Down Payment / Set Aside	Program Access O		

User ID and Password: If the member's eAdvantage Administrator will be assigned as AHP User they will not need to change or add a new User ID but can access AHP Online at <u>Affordable</u> <u>Housing Program - Grant Application (fhlbdm.com)</u>

If the eAdvantage Administrator is adding an AHP User, they will create a User ID for the AHP User. Their password for AHP Online will be generated after the AHP User is added. The AHP User will receive two separate secure emails. The first will include their User ID and the second will provide a temporary password. They will access AHP Online, and will be prompted to establish their own password at login.



NOTE: The AHP User may access AHP Online at <u>https://ahp.fhlbdm.com</u>.

eAdvantage		Dowpaymentuser
Affordable Housing Program (AHP) Online Down Payment / Set Aside Program Online		
	Terms and Constitions of Cole. Privace Policy: Deciamer: Mildimizeri.	
	For technical assistance, call 1-000-544-3452, ext. 2555 sarvice-desk@thibdm.com	



As shown above, the eAdvantage home page will include a link to the AHP Online system. All AHP Users may access AHP Online through that link in eAdvantage, directly at https://ahp.fhlbdm.com, or from a link to AHP Online in our public website at www.fhlbdm.com. See Affordable Housing and AHP Member. Institutions for the link to AHP Online.

Note: AHP Users that are not authorized to use eAdvantage will not have access to other modules in eAdvantage.

AHP Users will receive automated email communication at various stages throughout the application process.

1) When an application is initiated by an AHP Participant.

2) When an application becomes Sponsor Approved.

3) When an application becomes *Member Approved*.

4)Any time an application contact person, either the sponsor's AHP Participant or the member's AHP User, changes.

The next few pages describe the process of how a member may approve an AHP Application in AHP Online.



AHP Online login

AHP Online					
This is a <u>secured</u> site for Federal Hom	e Loan Bank of Des Moines Affordable Housing Program participants				
Oserib					
Password					
	Login				
Grant Applicants	FHLB Des Moines Members				
Create a User ID*	Forgot your password?				
Forgot your User ID?	Need access to AHP Online?				
Forgot your password?					
*If you have previously created a Use Do <u>not</u> create a new User ID for each					
	e you last logged in, your account is currently locked due to inactivity. esk at 800.544.3452, ext. 2555 to unlock your account.				
A	HP Online hours: 6:30 AM to Midnight CST.				
For optimum performance, the Bank recommends the use of Internet Explorer 8.0 or higher.					
If you have questions, please contact the FHLB Des Moines Community Investment Department at 800.544.3452, ext. 2400.					



After the member's AHP User receives an email advising that a sponsor has completed and approved an application they will need to access AHP Online to member approve the application.

1) How a Member Approves an AHP Application

\sim	Logout		Current as of April 3, 2015 at 1:02 PM CL	
HIN FHLB DES MOINES	Home eAdvantage Messages (0) Guides/In			
My Applications My Proje	ects			
My Applications				
Application Number	Application Name	Status	Funding Round Information	
Current/Last Round - 2015A			t 4:30 p.m. CT.	
10000035	HO Sponsor New Con	Pending	If you have any questions	
10000048	Sponosr Driven New Construction	Pending	regarding the AHP program, please contact us at 800-544-3452 ext-	
10000034	Rental New Con	Pending	Contact us at 000-044-0402 Ext-	
10000044	Owner Rehab by Consumer	Sponsor Approved	Hours of Operation	
10000041	Consumer driven down payment	Sponsor Approved	AHP Online system hours are from 6:30 a.m. to midnight CT.	
10000042	Rural #2	Pending	6.30 a.m. to midnight C1.	
			Community Investment hours of operation are from 8:00 a.m. to 4:00 p.m. CT, Monday through Friday.	
			DSM Implementation Plan	
			Terms Of Use	

All of the applications associated with this member will appear on the Home screen in AHP Online.

Notice the status of each application. The member will only be able to approve applications whose status is *Sponsor Approved*.

The member may view applications in *Pending* status; however, the member may not approve the application until the status is *Sponsor Approved*.



How a Member Approves an AHP Application

FHLB DES MOINES	s		Logout		Mr. Annlin		rrent as of April 3, 2015 at 1:21 PM CDT
Ind I did Theo bes montes					My Applica		Advantage Messages (0) Guides/Info
						Pr	roject Name: Consumer driven down paymen Application Number: 10000041
Application Ger	neral Information	Scoring	Feasibility				
Application I	Home						
Application	Tomo						DSM Implementation Plan
Application Status S				Status Change De	tails		Dom implementation Plan
	015A 6/30/2015		From Status	To Status	Changed By	Changed Date	Need Help?
Round Deadline 00/30/2015		Pending	Sponsor Approved	rbloxham629	04/03/2015	Contact the Community Investment at 800-544-3452 ext-	
Description						Status	100-51161L at 600-544-5452 6AL
General Information							
Application Details : Ap	oplication Information					1	AHP Application
Application Details : Site Information					1	It is recommended that you print the application for your records after the application has been approved by the sponsor.	
Application Details : Site Parcel							1
Application Details : Fair Housing						1	
Application Details : Subsidy Amount and Uses of Funds					1	Print Application	
Member Involvement : Member Policy					×	Application Attachments	
Member Involvement : Member Service					×		
Scoring							
Donated Property : Don	nation/Discount Informa	tion				1	

The member's AHP User opens the *Sponsor Approved* application and completes the two Member Involvement information screens.

Click on **Member Involvement: Member Policy** or **Member Involvement: Member Service** to complete the member screens.



How a Member Approves an AHP Application

Application General Information Scoring Feasibility
Member Involvement Information ? Member Policy Member Services
Does the Member have a mortgage or lien on the property?
Loan Amount
Appraisal Value Describe existing loans on units in the project. Answer yes or no
Interest Rate ⁺ to anticipated financing for the project below, both interim (non-
Date of Appraisal:
Term (in months):
Sale Price
Amortization Term (in months) *
Sale Date
Does the Member have any past or present financial or ownership interest in the project?" Yes O No
Describe the interest
You have 3988 characters remaining for your description.
Excluding the pass through of AHP Subsidy, is non-permanent financing being provided by the Member?* Ves O No
Will the Member use a Community Investment Advance (CIA) from the Federal Home Loan Bank as part of the project financing?* 💿 Yes 🔿 No
Excluding the pass through of AHP Subsidy, is a mortgage loan being provided by the Member?* Yes O No
Excluding the pass through of AHP Subsidy, are reduced closing costs being provided by the Member?* 🔿 Yes 🖲 No
* Required to save the page To submit your changes please click Save before exiting this page.
Required before Member Approval Save Undo
<previous next=""></previous>

The AHP User must complete the required fields before the Member Policy screen can be saved.

Even if the AHP User answers *No* to both questions, they must click on *Save* to complete the screen.

A green check mark should appear on the screen to

verify it is complete and saved. (See next page).



How a Member Approves an AHP Application	
Application General Information Scoring Feasibility	
Member Involvement Information ? Member Policy Member Services	
 ✓ Information Your changes have been saved to the system. 	
Excluding the pass through of AHP Subsidy, are grant(s) or in-kind contributions or services t	being provided by the Member?" I Yes O No
Describe services provided.	
	\sim
You have 3988 characters remaining for your description.	
Fee Charged	
* Required to save the page	To submit your changes please click Save before exiting this page.
Required before Member Approval	Save Undo
<previous< td=""><td>Next></td></previous<>	Next>

The AHP User must complete the required fields before the Member Services screen can be saved. After completing answers click on **Save**. A green check mark should appear on the screen to verify it is complete and saved.



~~~	Logout			Cui	rent as of April 3, 2015 at 3:32 PM	
பி பி FHLB DES MOINES	DES MOINES My Applications   Home   eA					
+12				Pr	oject Name: Consumer driven down pa	
45					Application Number: 100	
Application General Information Sc	oring Feasibility					
Home						
Member Approval Dme						
Application Status Member Approved		Status Change Det	tails		DSM Implementation Plan	
Funding Round 2015A	From Status	To Status	Changed By	Changed Date	101-1012121	
Round Deadline 06/30/2015	Pending	Sponsor Approved	rbloxham629	04/03/2015	Need Help? Contact the Community Investment at 800-544-3452 ext-	
	Provide line			54-1		
	Description			Status	AHP Application	
General Information					It is recommended that you print	
Application Details : Application Information				1	the application for your records	
Application Details : Site Information				1	after the application has been approved by the sponsor.	
Application Details : Site Parcel					approved by the sponsor.	
Application Details : Fair Housing		1	T Print Application			
Application Details : Subsidy Amount and Uses of		1	Application Attachments			
Member Involvement : Member Policy		1	Construction of the second			
Member Involvement : Member Service				1		

Once both the Member Policy and Member Services screens are complete and have a green check mark, the AHP User should review the completed AHP application.

The AHP User may do so by clicking on *Application/Home* in the top-left corner. From the Application Home screen, click on the first link under *Description* and use the *Previous* and *Next* buttons to navigate through the application screens.

The member may view the individual screens in the application. In addition, the member may print the application and all the application attachments from the links in the right-hand sidebar.

After the member has reviewed and printed the application and attachments, they can complete the approval process.

To Member Approve, the AHP User should begin by choosing *Member Approval* in the top-left corner of the Application Home screen.



	FirstName_12582 LastName_12582   Logout		Current as of January 14, 2020 at 2:34 PM CST
FHLB DES MOINES	Filstwalle_12302 Lastwalle_12302   Logout	My Application	s   Home   eAdvantage   Messages (0)   Guides/Info
			Project Name: SE Iowa Owner Occupied Rehab
			Application Number: 10001141
Application * Gene	ral Information		
Member Appro	val		
Current Status Sponsor Ap The application is complet	proved te. There are no issues found.		
operation of the Aff any other purpose p and housing access	vill only be used for the purposes specified in the app ordable Housing Program (the "AHP Regulations"). The prohibited by the AHP Regulations. The project will con sibility, including, but not limited to, the Fair Housing A abilities Act of 1990.	e subsidy received for this project will in apply with the requirements of all application	not be used for arbitrage purposes, or for ble federal and state laws on fair housing
subject to a fifteen- will ensure that the that are approved	ojects (excluding those projects approved for rehabili (15) year retention period. The Federal Home Loan Bar rental project, or each of the Affordable Housing Prog for rehabilitation only, is subject to a legally enforce nforceable under applicable law, (3) is in proper form for	k of Des Moines ("FHLBDM") member ram ("AHP") assisted units of an owne eable security instrument that (1) inc	approving this application (the "Member") r-occupied project, excluding those units corporates the requirements of the AHP
sole discretion. In the the proceeds of a fu Member agrees tha provided, however, determined by the F accordance with ap shall repay to the FF	r and the Member will be bound by the commitments many the event that the project sponsor fails to meet its specifi unded AHP subsidy will be recaptured by the FHLBDM it it shall recover from the project sponsor and repay that such repayment shall not be required if (i) the none FHLBDM, (ii) the circumstances of noncompliance are of plicable FHFA regulations, or (iii) the Member is unable HLBDM that portion of the subsidy as may be required to the terms of the application or applicable FHFA regulation	ied commitments, or otherwise falls out and the unused or improperly used sub- to the Bank that portion of the subsi compliance is cured by the project spor liminated through a modification of the to collect the subsidy after making re- ty the FHLBDM that, as a result of the M	t of compliance with the AHP Regulations, sidy will be returned to the FHLBDM. The idy as may be required by the FHLBDM; nsor within a reasonable period of time as e application approved by the FHLBDM in asonable efforts to collect it. The Member
name of the FHLBI	oject is made available through a financial commitmen DM will be prominently displayed in all promotional n mited to, news releases, site signage, etc. The Member 1	naterials related to ground breakings,	dedications, and all other media events,
information provide false or fictitious sta	es that the information provided by the Member in d by the member in the approved application will be rep atements made by the member in the application, as we le FHLBDM, may result in the withdrawal or required rep	orted to the FHLBDM. The Member ack I as any material changes to the inform	nowledges that any misrepresentations or
	ents and warrants that it has the full corporate power an e required, to enter into and perform its obligations und		rate and governmental authorizations and
The person represe presented in this ap	nting the Member by approving this application is duly plication.	y authorized by the Member to make so	uch representations and commitments as
Print your application by	clicking the link below. You will not be able to print your	application after the round closes	
Print Application	successing the link below. For will not be usie to print your	appression and the round closes.	
Application Attachments			
		1	
Important! After clicking the modify the application after	e "Approve" button the application status will change to "Me the status change.	mber Approved". You will not be able to	Approve Reject Refresh
		© 2020 Federa	al Home Loan Bank of Des Moines. All rights reserved.

#### **To Approve**

Once the member is ready to approve, the following steps must be taken:

Click on *Approve* at the bottom of the screen.

Read the AHP certification;

Check the box indicating that the certification has been understood and read; then



#### **To Reject**

If the member would like to reject the application and have the sponsor make changes, the AHP User should click on *Reject*.

#### To Save

To save a copy of the application as submitted, the Member Contact should click on *Print Application* and save to a location of his or her choosing. The application will save as a PDF.



FHLB DES MOINES			Logout		Current as of April 3, 2015 at 2:59 PM CDT
					My Applications   Home   eAdvantage   Messages (0)   Guides/Info
					Project Name: Consumer driven down payment
					Application Number: 10000041
Application	General Information	Scoring	Feasibility		
Member Approval					
<ul> <li>Information</li> <li>Your application is now Member Approved. Thank you for participating in the AHP program.</li> </ul>					
Current Status Member Approved					
The application is complete. There are no issues found.					
Print Application Application Attachments					
	nar dala balan karakar balar balar b		n ban ban san ban ban ba	eostar o sono son fostar o son e sa	Refresh

Once the application's status is *Member Approved*, the AHP Participant and the AHP User are unable to edit the application.

At this point, the application is submitted to the FHLB Des Moines for review.

The member and sponsor are notified via email that the application's status has changed to *Member Approved*.



#### Members Accessing AHP Online Through eAdvantage

- Members may participate in the competitive AHP round through AHP Online via eAdvantage or directly at <u>https://ahp.fhlbdm.com</u>.
- The member creates an eAdvantage Administrator (if one has not already been assigned).
- 3) The eAdvantage Administrator assigns AHP Users in eAdvantage.

#### **AHP Participants Accessing AHP Online**

AHP Participants may access AHP Online by clicking on the following URL, or copying and pasting it into their browser: <u>https://ahp.fhlbdm.com</u>. AHP Online can also

be accessed via a link on the Bank's public website at <u>www.fhlbdm.com</u>. See <u>Affordable Housing</u>.

The AHP Online hours are between 6:30 a.m. and midnight CT every day, including weekends and holidays. The Bank reserves the right to modify hours of operation and/or interrupt service at any time without prior notice to its customers if business or technology dictates the disruption. AHP Online is programmed with AHP Participants' protection in mind and will automatically log the user out if the page has been inactive for 30 minutes. For assistance in accessing AHP Online via eAdvantage, members may call the Service Desk at 800-544-3452, ext. 2555.

## AHP Participant Authorization Recertification for Sponsors

The Member and Sponsor Contacts are responsible for recertifying the AHP Participant(s) associated with their respective organizations on an annual basis. To recertify, log in to AHP Online and confirm that the listed users are in the General Information section on the Sponsor and Member Information screen. The screen will list all contacts associated with an organization that are approved and authorized for access to the applications and/or projects with which they are associated. Updates to Authorized AHP Users, profiles, and project contacts may be made at any time throughout the year.



# AHP Online Minimum Supported System Requirements

The following minimum supported system requirements are necessary to access and use AHP Online. If these requirements are not met, users may not be able to log in to the site or access all of the functionality that their role would otherwise allow:

- $\cdot$  Browser Recommendation: Google  $\mathsf{Chrome}^{\mathbb{R}}$  or Microsoft  $\mathsf{Edge}^{\mathbb{R}}$
- Operating system: Microsoft[®] Windows XP[®] (Service Pack 2 recommended), or Microsoft[®] Windows Vista[®] (with the latest service pack).
- Display: a recommended monitor display setting of 1024 x 768.
- Other software, such as Adobe[®]
   Acrobat[®]/Reader[®] 9 or 10, to view and print
   Portable Document Format (PDF) files.
- $\cdot$  Microsoft  $^{(\!R\!)}$  Excel  $^{(\!R\!)}$  Viewer 2007 or above to download Excel spreadsheets.
- $\cdot$  Recommended:  $\mathsf{Adobe}^{(\!R\!)}$   $\mathsf{Flash}^{(\!R\!)}$  Player to view Flash demonstrations.

#### **Privacy Policy**

In order to assist members of the Federal Home Loan Bank of Des Moines (the "Bank") with their required regulatory compliance, the following guidelines are adopted to address the privacy of confidential information which is received by the Bank from or on behalf of members or customers of the Bank (the "Members"):

With respect to nonpublic personal information (as that term is defined in the Gramm-Leach-Bliley Act) received by the Bank from or on behalf of Members, appropriate administrative, technical, and physical safeguards have been instituted to:

- Maintain the security and confidentiality of such information;
- Protect against anticipated threats or hazards to the security or integrity of such information; and
- Protect against unauthorized access to or use of such information.

No nonpublic personal information which is received from or on behalf of a Member is used by the Bank or disclosed to third parties, other than uses and disclosures which are permitted by statutory or regulatory exceptions.

Third parties engaged by the Bank who have access to nonpublic personal information received from or on behalf of Members are required:

- · To comply with all applicable privacy laws;
- To institute administrative, technical, and physical safeguards which are consistent with those outlined in paragraph 1 above;
- To limit their use of nonpublic personal information to the purpose(s) for which it was provided to them; and
- To release nonpublic personal information only as permitted by statutory or regulatory exceptions.



