

**The Webster Financial Corporation Privacy Policy and Disclosure
HSA Bank is a division of Webster Bank, N.A.**

The directors, management, and staff of Webster Financial Corporation, and its family of companies ("Webster") respect and protect the privacy of our customers' personal financial information.

This disclosure is made on behalf of Webster Financial Corporation and its family of affiliated companies: Webster Bank, N.A. (including HSA Bank, Webster Investment Services and Webster Financial Advisors, which are divisions of Webster Bank, N.A.); Webster Business Credit Corp.; Center Capital Corp.; Budget Installment Corp.; Fleming, Perry & Cox, Inc.

We understand that our customers furnish private information to our companies in the course of daily business, and we are committed to treating such information responsibly. We know that our customers expect privacy and security for their personal and financial affairs.

We take steps to safeguard private information that has been entrusted to us by our customers. When we use information, it is to help serve you better. Your information helps us appreciate all the business you have with our companies and identify affordable products and services that might serve you better. The following privacy policy and disclosure outlines our practice regarding personally identifiable financial information (or "nonpublic personal information") for consumers, those consumers who become our customers, and our former customers.

CUSTOMER PRIVACY BILL OF RIGHTS

At Webster, any employee access to customer information is authorized for business purposes only and is based on the sensitivity of the information and our employees' or agents' need to know. We remind employees regularly of their obligations regarding

customer information. Disregard of these obligations will result in disciplinary action, including termination in appropriate cases.

We have established and continually maintain security standards and procedures to help us protect you from unauthorized access to confidential nonpublic personal information that Webster maintains about you, including through the Internet.

Accuracy and Right to Correct Your Account Information

We continually strive to maintain complete and accurate information about you and your accounts. Should you ever believe that our records contain inaccurate or incomplete information about you, please notify us. We will investigate your concerns and correct any inaccuracies.

INFORMATION COLLECTION

At Webster, we collect, retain, and use information about you for the purpose of serving your financial needs and administering our account relationships. We collect information we receive from you on applications or other forms like surveys and questionnaires (for example, loan applications, deposit account applications and requests for information about accounts or products and services). We also collect (i) information about your transactions (such as payment histories or account balances) with us or experiences (such as information you have communicated to us about your financial needs) with us, (ii) information we collect through "cookies" (information collection devices from a web server) and (iii) information we receive from consumer reporting bureaus about your credit history and creditworthiness.

USE OF INFORMATION

We use personal information in ways that are compatible with the purposes for which we

originally requested it. For example, we use the information for our everyday business purposes such as processing transactions, mailing and auditing services, providing information to credit bureaus and responding to court orders and legal investigations. We collect and use personal information to administer our business and deliver quality service to you. This may include advising you about our products or services, those of our affiliates, those of our business partners and other opportunities that we believe may interest you.

INFORMATION SHARING


The foregoing information about both current and former customers may be shared with the following categories of Webster companies and unaffiliated third parties:

Sharing Within Webster's Family of Companies ("Affiliate Sharing")

For our everyday business purposes, information we have collected may be shared among Webster's family of companies (for example, Webster Bank, N.A., and Center Capital) in order that we can provide products and services appropriate to your needs and circumstances. Federal law gives you the right to limit (called an "opt-out") Affiliate Sharing of information about your creditworthiness. To Opt-Out of Affiliate Sharing of Creditworthiness Information see Section 1 under Your Choices below.

Limiting Marketing to You By Webster's Family of Companies

Federal law gives you the right to limit some but not all marketing from the Webster family of companies. Federal law also requires us to give you this notice to tell you about your choice to limit marketing from the Webster family of companies. You may limit the Webster family of companies, such as Webster Bank, N.A., Center Capital Corp.,

		Consumer Privacy Preference Form	
No action is required if you do not want to opt-out or limit sharing information. If you want to opt out or limit, check any/all of the following boxes and mail this form to: HSA Bank, A Division of Webster Bank, N.A., 605 North 8 th Street, Ste. 320, Sheboygan, WI 53081 or call 1-800-357-6246			
<input type="checkbox"/> Do not share information about my credit worthiness with your affiliates for their everyday business. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.			
If you have previously completed a consumer privacy preference form, all preferences remain in place and there is no need to complete an additional form.			
Customer Information: To enable us to process your request, please complete the following			
Last Name		First Name	
Address		City	State
Type of Account		Account Number	
Date	Signature		

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Webster Business Credit Corp., Fleming, Perry and Cox, and Webster Budget Installment Corp. from marketing their products and services to you based on your personal information that they receive from other Webster companies. This information includes your income, your account history, and your credit score.

Your choice to limit marketing offers from the Webster companies will apply until you tell us to change your choice. To limit marketing based on such information received from other Webster Companies, see Section 2 under Your Choices below.

Sharing with Webster's Service Providers/Joint Marketers

From time to time, we may use outside companies to perform services for us for our everyday business purposes, reporting to credit bureaus and to assist us in marketing our own products and services. In order to complete these tasks, we may provide our service providers with information we collect about you. We require our service providers to comply with our standards regarding security and confidentiality, and permit them to only use your information for purposes authorized by us.

Webster may also enter into joint marketing agreements with selected financial institutions, in order to assist us in providing quality products and services to you. We require these financial institutions to keep your nonpublic personal information confidential, and permit them to only use your information for purposes authorized by us.

Your Choices

1. To Opt-Out of Affiliate Sharing of Creditworthiness Information, check box number 1 on the Customer Privacy Preference Form provided with this disclosure.
2. To limit marketing based on personal information received from other Webster

Companies, check box number 2 on the Customer Privacy Preference Form provided with this disclosure.

The Customer Privacy Preference Form must be mailed in a separate envelope and should not be included in any other correspondence. We will process your request as soon as possible after we receive it.

Information Reported to Consumer Reporting Agencies

Under the Fair and Accurate Credit Transaction Act (FACTA), you have the right to notify us if you believe we have reported inaccurate information about your account to any consumer reporting agency. Such notices should be sent in writing and include your complete name, current address, social security number, telephone number, account number, type of account, specific item of dispute and the reason why you believe the information reported is in error.

Send your notice to: Webster Financial Corporation, P.O. Box 10305, WFD730, Waterbury, CT 06726. We will investigate your concerns and correct any inaccuracies and confirm our actions to you. You may obtain a free credit report annually by calling Equifax, Experian and Trans Union at the numbers listed in this brochure.

At Webster, we have no higher priority than continuously earning our customers' trust.

Identity Theft

Identity theft is a growing crime in our country. Each day, thousands of people become victims of identity theft. Identity theft occurs when someone steals your personal information and uses it to establish credit, charge items or borrow money using your name.

Protecting Your Identity

- Tear up unused credit offers and other documents containing personal

information before you discard them.

- Guard your social security number.
- Do not release information to people you don't know, especially over the phone or Internet.
- Review bank statements for accuracy.
- If you are denied credit for no apparent reason, obtain a copy of your credit report.

If You Become a Victim of Identity Theft

- Contact your bank and all others with whom you have a financial relationship.
- File a police report if you have a loss.
- Report the fraud to the major credit bureaus:

Equifax	1-800-525-6285
Experian	1-888-397-3742
Trans Union	1-800-680-7289

For additional help, call the Federal Trade Commission at 1-877-ID-THEFT or visit their website at:

<http://www.consumer.gov/idtheft/>.



The Webster symbol is a service mark of Webster Financial Corporation. Webster and Webster Bank are registered in the U.S. Patent and Trademark Office.

Webster Bank, N.A.
March, 2009
Member FDIC

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RE: FINANCIAL PRIVACY

Dear HSA Bank Accountholder:

HSA Bank is a division of Webster Bank, N.A., and part of a large and diversified financial organization. Webster Bank brings to HSA Bank significant strengths and resources, which help HSA Bank to improve its services to you.

As part of Webster Bank, we follow the Webster Financial Corporation Privacy Policy and Disclosure. Under this Privacy Policy and Disclosure, you retain significant rights concerning the sharing of your nonpublic personal information.

We have a strong commitment to safekeeping your information. Our current practice is that we do not share your nonpublic personal information with certain affiliates of Webster Bank. These affiliates include Webster Investment Services, Inc.; and Fleming, Perry & Cox, Inc. As a result, these affiliates are not able to use your nonpublic personal information to send you solicitations for any products or services. You may, however, request information for products and services from these affiliates at any time.

You also have the right as a HSA Bank accountholder to prevent the sharing of your nonpublic personal information with all affiliates of Webster Bank. To do so, you can call our Client Assistance Center at 1-800-357-6246 or complete and mail the attached Consumer Privacy Preference Form to the address indicated in the Form.

Sincerely,

Kirk Hoewisch
President, HSA Bank