

# Privacy Policy

November 14, 2005

At COMMODORE BANK we recognize and respect the importance of our customers' privacy. We want your relationship with the Bank to be as free from privacy concerns as possible. Our policy is to keep information that we have about you restricted only to those who legitimately have a need for data to process transactions or provide services for you. Reinforcing our commitment to safeguard the privacy of our customers' nonpublic personal information, Commodore Bank has adopted the following Privacy Statement.

## **1. COLLECTION, RETENTION, AND USE OF CUSTOMER INFORMATION BY THE BANK**

### ***Information We May Collect About You***

Naturally, the type of information we collect about you depends on the service or product that you request. Some of the information is publicly available information, for example your name and your listed telephone number and address, which information generally is not considered "nonpublic personal information." The nonpublic personal information that we may collect and retain includes personally identifiable financial information such as:

- your social security number, annual income, current and former employers;
- answers to questions on deposit, loan, and credit card applications;
- deposit and loan balances, overdraft history, and payment history with us and what types of products or services you purchase or use from us and how you use them; and
- your credit history and savings history, including current and past debts and credit scores.

We collect nonpublic personal information about you from applications and other forms; from information about your transactions with us or with others; and from information we receive from credit reporting agencies.

### ***How We Use This Information***

At Commodore Bank we do not sell customer information to any outside parties for marketing or any other purpose. Commodore Bank collects this information about our customers and applicants for specific business purposes, such as for loan qualification or to open an account. We also collect information when we believe that it will help us administer our business or provide products, services and other opportunities for our customers. Commodore Bank will use the information it collects:

- to protect and administer customer records, accounts and funds;
- to qualify you for products or services;
- to complete transactions initiated or approved by our customers and prospects;
- to comply with laws and regulations;
- to help us create new and improved products and services for our customers; and
- to introduce new products and services to our customers.

### ***Here Are Examples of How Our Policy Works:***

When you apply for any of our products or services, we will ask you for certain personal information to process your application. This information may be retained by Commodore Bank and by the third-party businesses that help us provide you with the product or service. If you send us an e-mail, Commodore Bank may retain the contents of the e-mail, the domain or source of the visitor, and our response.

## **2. DISCLOSING YOUR INFORMATION OUTSIDE OF COMMODORE BANK**

From time to time, Commodore Bank will provide information about you to our business partners, or to others as allowed by law. In many cases information sharing is necessary for us to perform business functions and services, such as processing your ATM transactions or bill payments.

### **Disclosures Allowed by Law**

- as necessary to effect, administer, or enforce a transaction requested or authorized by a consumer or customer in connection with servicing or processing a product or service requested by a customer;
- with your consent or at your direction;
- to protect the confidentiality or security of Commodore Bank's records, protect against fraud, manage risk, and resolving customer's matters;
- to assess compliance by Commodore Bank;
- to cooperate with law enforcement and government regulatory agencies and other investigations on matters of public safety, to the extent allowed by law;
- to report to a consumer reporting agency;
- to comply with federal and state legal requirements and investigations.

### ***Disclosures to Business Partners and under Joint Marketing Agreements***

Commodore Bank may also share nonpublic personal information about you with our agents, whether a person or a company, with our affiliates, which are companies we own or control or that own or control us, or under joint marketing arrangements with other financial institutions that provide convenient access to other products or services that we believe benefit you.

Commodore Bank enters into agreements with business partners and agents to provide key business functions, such as credit and debit card processing, and expanded financial products and services. For example, we may offer insurance, uninsured products and stock brokerage services through arrangements with third parties to enhance and expand the products and services available through the Bank, or a third party might offer credit life insurance to loan customers of Commodore Bank. Our business partners and agents are asked to enter into agreements with Commodore Bank prohibiting them from disclosing or using the nonpublic personal information for any purpose other than carrying out the purposes for which you disclosed the information, performing necessary business functions or services, or making disclosures allowed by law.

### ***Here Are Examples of Information Sharing with Third Parties***

When you apply for a mortgage loan, we share information about you with title companies and appraisal firms because that is necessary for us to ascertain the quality of title on the property securing the loan you apply for and the appraised value of that property. And we share information about you with credit reporting agencies so that we can determine your credit standing. Or we might share information about you to companies that offer mortgage insurance and credit life insurance to you. If we sell your mortgage loan in the secondary mortgage loan market, we must provide your entire mortgage loan file to the party purchasing your loan, for example Fannie Mae or Freddie Mac. If you have a checking account with Commodore Bank, we share information about you – including your account number – with a third party that prints checks for Commodore Bank customers. If you apply for a credit card, we share information about you with the credit card issuer because it could not issue a card to you without that information. These examples illustrate some of the circumstances in which we share personal nonpublic information about you.

### ***Summary of Commodore Bank Disclosures to Nonaffiliated Third Parties***

Commodore Bank will not provide any non-public, personal information about our customers or former customers to nonaffiliated third parties

- except as permitted by law, or
- except without entering into a business partnership or agency.

We restrict our disclosures of nonpublic personal information about customers and former customers in this way because we want control over the privacy of your information. Therefore, there are no opt-out provisions of our policy.

### **3. INFORMATION WE NEVER SHARE WITH NONAFFILIATED THIRD PARTIES**

With the exception of companies who we contract with to provide transaction authorizations and processing services for our customers, we will never share your access code for your savings or credit accounts at Commodore Bank. We will not share account numbers with nonaffiliated third parties for use in telemarketing, direct mail marketing or marketing through electronic mail. We will not use or share — internally or externally — personally identifiable medical information for any purpose other than the underwriting or administration of a customer's policy, claim or account, or as disclosed to the customer when the information is collected, or to which our customer consents.

### **4. DISCLOSING YOUR INFORMATION TO COMMODORE BANK AFFILIATES**

In the future, we could provide products and services to customers through affiliated companies. Affiliated companies are entities that control, are controlled by, or are under common control with another company. This control factor among affiliated companies ensures that information may flow freely while ensuring that policies and controls necessary to protect the privacy of information will be consistently enforced. By allowing affiliates to share information about you and the products and services you obtain, you could receive easier access to certain account features, new or enhanced products, special promotional offers and special discounts that you might not otherwise know about or be eligible to receive.

The Fair Credit Reporting Act governs information sharing among affiliates. It would allow us to share personal information about you, unless you exercise your rights under the Fair Credit Reporting Act to prevent sharing of that information. Currently, the only Commodore Bank affiliate is Commodore Financial Network.

### **5. MAINTAINING THE INTEGRITY OF YOUR INFORMATION**

We strive to maintain current, accurate and complete information on our website. We have procedures to investigate customer reports of incorrect information, and we correct information when we determine that it is inaccurate. We also follow security procedures that are designed to guard against unauthorized access to and disclosure of customer information. Any employee who violates our confidentiality standards is subject to disciplinary action.

#### ***Security Procedures Protect Your Information***

We have disaster preparedness programs to secure your information in case of natural disaster, hazards, or threats. We also test our security and confidentiality procedures to make sure they work.

### ***Employee Training and Access to Your Information***

We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information. We train our employees and agents to be sensitive about confidentiality and customer privacy. Every Commodore Bank employee is required to verify in writing that he or she has received and read the Employee Handbook, which describes employees' responsibility for safeguarding the confidentiality of our customers' and prospects' records and financial affairs.

We restrict access to nonpublic personal information about you to those employees who need to know that information so that we can provide products and services to you. We will not provide information to anyone without first verifying who the person is and whether that person has legal access to the information. We prohibit our employees or agents from giving information about you if it would violate law or our privacy policy.

## **6. LIMITATIONS AND ADDITIONAL PRIVILEGES**

Nothing in this policy prevents Commodore Bank from marketing our own products and services to our customers. If you do not want to receive any solicitations or information from us on new products or services at any time, please let us know by writing to us at:

**COMMODORE BANK  
PO BOX 460  
100 East Main Street  
Somerset, Ohio 43783  
or by calling us at:  
740.743.1349**

Like other financial service organizations, Commodore Bank sometimes purchases mailing lists from outside agencies that are in the business of compiling lists to be purchased by others for their independent use.

If you are turned down by Commodore Bank for credit or services because of your credit, and our decision is based upon a credit report from a credit reporting agency, you may receive a free copy of your credit report. We will inform you of this right if and when you are denied credit or services based upon your credit report. You may also obtain a copy of your credit report from the three principal credit reporting agencies. You might wish to do so annually to review these credit reports for errors. The Fair Credit Reporting Act allows credit reporting agencies to charge a reasonable fee for providing these copies to you. To order a copy of your credit report, call:

**Equifax, at 800.685.1111  
Experian, at 888.397.3742  
or Trans Union, 800.916.8800**

## **7. ENDING THE CUSTOMER RELATIONSHIP**

When you or we end your customer relationship with us, we will treat the information we have about you as if you were still our customer.

## **8. THIS POLICY DOES NOT EXPAND OUR LEGAL OBLIGATION**

This policy statement does not expand legal obligations and is not intended to create any liability other than that found in law.

## **9. WE MAY CHANGE THIS POLICY AT ANY TIME**

We reserve the right to change this privacy statement at any time.