



## PRIVACY POLICY DISCLOSURE

Independent Community Bankers' Bank understands that confidentiality is important to our customers and is essential in our business. It is our policy that information supplied to us by our customers will be considered confidential. We commit to our customers that we will take all reasonable steps to protect the privacy of the information that is shared with us, unless otherwise instructed to share that information by our customer specifically. This policy holds true, whether the information is received via telephone, in person, or online at our website.

### Use, collection, and retention of respondent bank information:

Independent Community Bankers' Bank collects your institution's information to administer our business and uses your bank information to make products, services, and other opportunities available to you. We also use information we collect to identify you, to communicate with you, and to help us respond to your requests.

### Maintenance of accurate information:

We strive to maintain customer records that are accurate, current, and complete in accordance with bank regulations. We respond to requests to correct inaccurate information as promptly as possible.

### Employee access and use of respondent financial information:

Independent Community Bankers' Bank employees are required to follow our Code of Ethics. The Code of Ethics provides that employees are obligated to keep customer information confidential and to never disclose such information to outside third parties.

### Restrictions on account information:

Independent Community Bankers' Bank does not reveal specific information about our customer accounts to unaffiliated third parties for their independent use.

### Maintaining customer privacy in business relationships with third party providers:

Independent Community Bankers' Bank insists that all third-party relationships adhere to similar privacy principles that keep our customers' information confidential, unless as required by law.

### Important Information About Procedures for Opening a New Account:

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When a bank opens an account, we will ask for the names of account signers, persons with wire transfer authority, and Board members. We will also obtain a good-faith statement from the secretary of state's office for your bank's location. These will allow us to identify you. We may also ask to see your driver's license or other identifying documents in the case of loans.