

National Cooperative Bank, N. A.

Privacy Policy

Reviewing Board Committee	Operations Technology Sub Committee
Reviewing Management Committee	Information Security Steering Committee
Responsible Executive	Cecil Greene/Chief Information Security Officer
Review Cycle	Annual (Second Quarter)
Last Approval Date	05-09-19
Effective Date (if different)	

Privacy Policy

National Cooperative Bank, N.A. (“NCB”) is committed to providing the highest level of security and privacy regarding the collection and use of our customers’ personal information.

NCB recognizes its customers’ right to expect that their personal financial information will remain private and secure. The Bank will maintain standards to ensure this security at all times.

NCB will limit the use and collection of information about its customers to that which is necessary to administer business, provide superior service, and offer opportunities that the Bank thinks will be of interest to its customers.

NCB has established security policies, standards, and procedures to ensure that its customers’ financial information is accurate, current and complete, in keeping with reasonable commercial standards. NCB also pledges to respond to requests to correct inaccurate information in a timely manner.

A. Non-Public Personal Information Collection

Information about consumers is accumulated from a variety of sources. Some information is provided to NCB directly by customers themselves. Other data is developed by NCB as a function of providing a product or service to a customer. Still other information is obtained from outside sources.

Non-public, personal information may be collected from the following sources:

- a) Information the Bank receives from applications or other forms, such as names, addresses, social security numbers, assets and income
- b) Information about transactions with the Bank, its affiliates or others, such as account balances, payment histories, parties to transactions and credit card usage
- c) Information the Bank receives from a consumer reporting agency, such as creditworthiness and credit history

B. Non-Public Personal Information Disclosure

NCB may share non-public personal information about its customers or former customers on a limited basis with certain parties in the manner set forth below, in accordance with applicable law.

1. Disclosure as Permitted by Law

NCB may disclose all of the information it collects, as described above to service providers and companies that perform marketing services on the Bank’s behalf or to other financial institutions with whom the Bank has joint marketing agreements.

It is NCB’s policy not to reveal specific information about customer accounts or other personally identifiable data to unaffiliated third parties for their independent use, except for the exchange of information with reputable information reporting agencies to maximize the accuracy and security of such information or in the performance of bona fide corporate due diligence or business matter, unless:

- a) The information is provided to help complete a customer-initiated transaction;
- b) The customer requests or permits the disclosure;

- c) The disclosure is required by or allowed by law (e.g., subpoena, investigation of fraudulent activity, demand by regulatory authorities, etc.); or,
- d) The customer has been informed about the possibility of disclosure for marketing or similar purposes through a prior communication and given the opportunity to decline (i.e., “opt out”).

When NCB provides customer information to an unaffiliated third party, the Bank will require – through a written agreement – that the third party adhere to privacy principles similar to those to which NCB adheres for keeping this information confidential.

2. Confidentiality and Security

NCB restricts access to non-public personal information about its customers to those employees who need to know that information to provide products or services. The Bank maintains physical, electronic and procedural safeguards for the purpose of securing non-public personal information.

NCB also educates all Bank employees about the importance of confidentiality and customer privacy.

C. Exceptions

There should be no exceptions to this Policy. Should, however, an exception arise, it shall be promptly reported to the Board at the next quarterly meeting unless circumstances warrant a shorter period of time.

D. Review of Policy

The Board of Directors, or its designee, shall review this policy at least annually, making such revisions and amendments, as it deems appropriate.