

ProGrowth® Bank Privacy Policy

Just as we trust you, we value the trust you have placed in us. At ProGrowth Bank, we continue to earn your trust each day. Our Privacy Policy and daily efforts focus on protecting your personal information.

Our Pledge To You

- We are committed to protecting your privacy at all times.
- We do not share customer information with outside companies for purposes of selling their products and services to you.
- We are committed to deliver banking services you need to succeed financially. If we do not offer a financial service, such as some insurance products, we may establish a joint marketing program with an outside company to offer that service to you. These programs include confidentiality agreements to protect customer information.
- We maintain security standards and procedures designed to protect you. We continually test and update our technology to protect your information.

You can count on us to protect the privacy and security of your information, and to provide you with responsive, professional service. The ProGrowth name has been a trusted symbol of service and reliability for over 100 years. We are committed to earning your trust – and your business – every day.

Notice of Your Financial Privacy Rights

We, our, and us, when used in this notice, means ProGrowth Bank.

You and your when used in this notice means our customers who have a continuing relationship by purchasing or holding financial products or services such as a:

Deposit Account • Loan Account • Safe Deposit Box

Information Collection

Accurate, private customer information helps us to provide superior service to you. We may collect information about you from a variety of sources, such as:

- Information we receive from you on applications or other forms, such as: your name, address, social security number, assets, liabilities and income.
- Information we receive from an outside company, such as a consumer reporting agency, e.g., your credit history, payment history and creditworthiness; or
- Information about your transactions or experiences with ProGrowth Bank or other parties, e.g., your account balances, payment history and account activity.

Information Use and Disclosure

We use customer information for various reasons, including the following:

- To protect you. The information we maintain about your customer relationship helps us identify you and helps prevent unauthorized persons from accessing your information, your accounts or your services.
- To provide superior service. Your customer information allows us to respond quickly and efficiently to your needs.
- To tell you about new or enhanced financial services. By understanding our relationship, we can better meet your needs and determine your eligibility for other ProGrowth services that could be of value to you.

- To improve and develop our products and services. Every product or service we offer is designed to reflect the ways our customers actually use their accounts.

We do NOT disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. However we may disclose the information described in the "Information Collection" section to the following types of outside companies or parties:

- Non-financial companies, including companies that perform services on our behalf, such as check printers, companies that prepare account statements, or companies that help us market our own products to you; and
- Independent contractors, such as technical systems consultants who program our software to help us administer or market our products to you.
- Government agencies, consumer-reporting agencies, and other outside parties as permitted or required by the Federal Privacy Act and other applicable laws. These disclosures are made for specific, limited purposes, such as to verify individuals' identities (reducing fraud and identity theft), to meet customer service expectations (connecting to national ATM networks for ATM card access), to verify information for prompt credit approvals (meeting customers' immediate financial needs), or to make certain information a matter of public record (recording mortgages to let prospective buyers, title insurers, and others know about property liens).

We do not share customer information with outside companies for the purpose of marketing non-financial products or services of those companies.

Information Confidentiality and Protection Practices

ProGrowth Bank is committed to preventing others from unauthorized access to your information. We take several steps to protect your information, including:

- We update and test our procedures and technology regularly to improve the protection of your information.
- We require outside companies and independent contractors to whom we provide customer information for marketing, servicing or processing purposes to enter into a confidentiality agreement that restricts the use of the information beyond the performance of the specified services on our behalf.
- Our procedures limit access to your information to employees who need to know that information to help you. Our physical, electronic, and procedural safeguards comply with federal standards to guard your nonpublic personal information.

Information Integrity Measures

At ProGrowth Bank, we work hard to ensure that your personal information is complete, accurate and safeguarded. We have secure procedures and processes to update your private information and to remove old information.

We safeguard customer information through measures such as: maintaining backup copies of account data in the event of power outages or other business interruptions, using computer virus detection and eradication software on systems containing customer data, installing computer hardware and software, and employing other technical means (known as "firewalls") to protect against unauthorized computer entry into systems containing customer information.