

PRIVACY STATEMENT

The directors, management, and staff of Citizens Guaranty Bank are concerned about and respect the privacy of customers' and the consumers' personal financial information. We understand that our customers furnish sensitive information to the bank in the course of daily business, and the bank is committed to treating such information responsibly. We know that our customers expect privacy and security for their personal and financial affairs.

The bank will take all the necessary steps to safeguard sensitive information that has been entrusted to us by our customers. The following privacy policy and disclosure outlines our bank's practice regarding personally identifiable financial information for consumers and those consumers who become our customers. We will provide a privacy notice to each person who opens an account or applies for credit at our bank. We will use the appropriate model form published by the agencies to enjoy the safe harbor for notice contents.

The bank will provide a clear and conspicuous privacy notice at the time a customer establishes a relationship with the bank. The notice may be provided in writing or electronically if the customer agrees to electronic delivery.

The bank is required to notify customers annually of its privacy practices and provide a privacy notice annually during the continuation of the customer relationship, unless:

1. No opt-out rights are triggered by the bank's information-sharing practices under the Gramm-Leach-Bliley Act (GLBA) or the Fair Credit Reporting Act (FCRA), and opt-out notices have previously been provided;
2. The information in the privacy notice has not changed since the customer received the prior notice, and
3. The bank uses the model form provided in Regulation P.

TYPES OF INFORMATION THE BANK COLLECTS

At Citizens Guaranty Bank we collect nonpublic, personal information about you from many sources, including the following:

- Information we receive from you on applications or other forms
- Information about your transactions with us, our affiliates, or others
- Information we receive from a consumer reporting agency

Nonpublic, personal information does *not* include that which is available from government records, widely distributed media, or government-mandated disclosures.

TYPES OF INFORMATION THE BANK DISCLOSES

The bank does not now, nor does it intend in the future, to disclose any personal financial information to any nonaffiliated or affiliated third party. By law the bank may disclose certain personally identifiable information without allowing consumers the right to opt out of the bank's sharing agreements in the following circumstances:

- To companies who perform transaction processing for the bank in the following circumstances:
 - If the transaction, service, or product is requested or authorized by the consumer
 - To maintain or service a consumer's account as part of a private label credit card or other loan extension program

— In connection with a securitization, secondary market sale (including servicing rights), or similar transaction related to a consumer

- To disclose information necessary to enforce the bank's legal or contractual rights or the rights of any other person who is engaged in the financial transaction
- To disclose information required in the ordinary course of banking business, such as the settlement of claims or benefits, the confirmation of information to the consumer or the consumer's agent, and the billing, processing, or clearing of items in the normal course of business
- To provide information to insurance rate advisory organizations, guaranty funds or agencies, agencies that are rating the bank, persons who are assessing the bank's compliance with industry standards, and the bank's attorneys, accountants, and auditors
- To the extent permissible under the Right to Financial Privacy Act
- To a consumer reporting agency under the Fair Credit Reporting Act
- To comply with federal, state, or local laws, rules, and other applicable legal requirements

SAFEGUARDING CUSTOMER INFORMATION

At Citizens Guaranty Bank we protect consumer privacy by ensuring that only employees who have a business reason for knowing information have access to it. The bank has appointed a Privacy Officer, who is responsible for maintaining internal procedures to ensure that our customers' information is protected. For example, information in loan files can only be accessed by employees who work in the loan origination or loan operations departments.

All employees have a copy of this policy and are trained at least annually regarding the importance of safeguarding customer information. The chief operations officer, the human resources department, and the appropriate department manager will take disciplinary action against any employee who violates the bank's privacy policy and procedures.

If we change our policy or practice by, for example, adding a category of information that we will disclose to a third party, we will notify existing customers and give them an appropriate time period to opt out of the disclosure.

CONTACT INFORMATION

Citizens Guaranty Bank welcomes your comments regarding this Statement of Privacy. If you believe that Citizens Guaranty Bank has not adhered to this Statement, please contact Citizens Guaranty Bank at **contactus@mycgb.com**. We will use commercially reasonable efforts to promptly determine and remedy the problem.