

Internet Privacy Disclosure

Sturdy Savings Bank recognizes the importance our customers place on the privacy and security of their personal information. Our goal is to protect your personal information in every way that we interact with you, whether it's on the telephone, in our lobby, at one of our ATMs, or on the Internet.

We think it is important for you to be informed of the policies, procedures, and security measures we have in place to safeguard your personal and confidential information. With that in mind, we have developed this policy to help you to understand the steps we take to protect your personal information when you utilize our Internet services.

Sturdy Savings Bank may utilize the services of third party providers to assist us in providing online services, such as website hosting, Internet banking, bill payment, and aggregation services. These third party providers are referred to within this policy as “service providers”.

Information Collected on the Internet

If you are just browsing through our website, we do not request any personally identifiable information, nor do we collect unique identifying information about you unless you voluntarily and knowingly provide us that information. If you provide us this information, it is only used internally and in furtherance of the purpose for which it was provided.

As part of providing online financial products or services, we may obtain information about our customers and website visitors from the following sources:

- Information we receive from you on applications, emails, or other forms;
- Information about your transactions with this institution;
- Information we receive from a consumer-reporting agency; and
- Information that is generated electronically when you visit our website; and
- Information that is generated electronically when you use our Internet banking services.

Service providers hosting our website and our Internet banking service may collect general information on our website visitors simply to help us provide banking and other financial services to you online. They collect the following information on our behalf:

- The Internet address (referral site) which brought you to our web site;
- The date and time you access our site;
- The name and version of your web browser;
- The Internet service provider you used when you accessed our site;
- Your Internet Protocol (IP) address;
- The pages visited in our website; and
- The pages you visit after leaving our website.

Our service providers may use cookies to collect some the above information. They may also use cookies for security purposes within our Internet banking product. Additionally, cookies may be used for website retargeting.

Additional information about IP addresses and cookies are provided below.

Internet Protocol (IP) Addresses

An IP address is a number that is automatically assigned to your computer whenever you are on the Internet. Web servers, the computers that "serve up" web pages, automatically identify your computer by its IP address. When collecting information for us, our service provider does not link IP addresses to anything personally identifiable; however, this Institution and its service providers may use IP addresses to audit the use of our site. We can and will use IP addresses to identify users when necessary for security purposes.

What is a Cookie?

A cookie is a very small text file sent by a web server and stored on your hard drive, your computer's memory, or in your browser so that it can be read back later. Cookies are a basic way for a server to identify the computer you happen to be using at the time. Cookies are used for many things from personalizing start up pages to facilitating online purchases. Cookies help sites recognize return visitors and they perform a very important function in secure Internet banking.

Our service provider uses cookies for security purposes within our Internet banking product and to facilitate retargeting marketing strategies. For your security, our service provider does not store any personally identifiable information in cookies which are further described below.

Internet Banking Cookies

Our Internet banking product uses encrypted cookies that do not pass to your computer's hard drive. Instead, the cookie is stored in your computer's memory, identifying only your computer while you are logged on. Only our service provider can read the information in these cookies. The Internet banking cookie facilitates the processing of multiple transactions during a session without requiring you to reenter your passcode for each individual transaction. The cookies for Internet banking simply provide another level of security for our Internet banking product. When you log off, or close your browser, the cookie is destroyed. A new cookie is used for each session. That way, no one can use the prior cookie to access your account. For additional security, the cookie expires after 10 minutes of inactivity. It must then be renewed by reentering your passcode. We do not (and cannot) use this cookie to collect or obtain new personal information about you. You must allow your browser to accept this cookie so you can use the Internet banking product.

Website Cookies

When you register on our website and select the "Remember Me" checkbox, our service provider sends a cookie to your hard drive, which enables you to customize the website and bypass the login process each time you revisit. These cookies are retained on your computer until you either

delete them or click on the logout link within the website. These cookies only contain a unique user identification number and do not contain or collect any personally identifiable information.

When registered users login to the website, our service provider may also send cookies called "per-session" cookies or "server-side" cookies. These cookies reside in the browser and are only used to monitor the session by a unique identification number. These cookies are used for security purposes and you must allow your browser to accept these cookies in order to use the website. These cookies are destroyed after eight hours.

When you click on advertisements in our website or advertisements on linked 3rd party web sites, you may receive another cookie. You do not have to accept these cookies to visit the website.

Use of Information Collected

- We do not disclose non-public personal information (obtained from visiting our website, or using our online banking services) about our current or former customers or website visitors to third parties, except as permitted or required by law.
- In order to provide online services such as: Internet banking and bill payment, we must disclose certain customer account information to our service providers.
- We do not sell any of your personal information.
- We will not disclose any medical information that you provide to us, unless you specifically authorize its disclosure.
- We may disclose customer information that we collect on our website to service providers, companies, and/or financial institutions that perform marketing and research services on our behalf and with whom we have joint marketing agreements. Our contracts require these service providers, companies and/or financial institutions to protect the confidentiality of your personal information to the same extent that we must do.

Email Policies

If you send us an email, please do not include any non-public personal or sensitive information, as email messages may not be secure and/or confidential. We offer secure messaging through our Internet Banking service. You should use the secure messaging service anytime you send us sensitive personal information.

External 3rd Party Links

Our website may include numerous links to other 3rd party sites. These links to external third parties are offered as a courtesy and a convenience to our customers. When you visit these sites, you will leave our website and will be redirected to another site.

This financial institution does not control linked 3rd party sites. We are not an agent for these third parties nor do we endorse or guarantee their products. We make no representation or warranty regarding the accuracy of the information contained in the linked sites. We suggest that you always verify the information obtained from linked websites before acting upon this information. Also, please be aware that the security and privacy policies on these sites may be different from our policies, so please read third party privacy and security policies closely.

If you have questions or concerns about the privacy policies and practices of linked third parties, please review their websites and contact them directly. This privacy policy applies solely to information collected by this institution.

Security

This Institution and its service providers have developed strict policies and procedures to safeguard your personal information. We restrict employee access to your sensitive personal information on a "need to know" basis. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information. We educate our employees about the importance of confidentiality and customer privacy.

Our Internet banking service provider, has developed a top-of-the line security system to ensure your customer information is protected on the Internet and within the data center environment.

Privacy of Children

This financial institution respects the privacy of children. Our website and on-line services are not directed to children under 13, and we do not knowingly collect personal information from children under 13.

Privacy Updates

New product releases may require changes to our Internet Privacy Policy. The effective date of our policy will always be clearly displayed. If we make any changes regarding the use or disclosure of your personal information, we will provide you prior notice and the opportunity to opt-out of such disclosure if required by law.