

## **Online Privacy Statement / Privacy Policy / Customer Identification Program**

At the Bank of the Orient we are sensitive to your very legitimate concerns about the privacy and confidentiality of your personal and financial affairs. Our Bank-wide privacy notice is available on this same web site.

This Online Privacy Statement is limited to special electronic privacy issues. We wanted to take this opportunity to tell you about our Privacy Policy here at the Bank of the Orient and the steps we have taken to protect any and all information you share with us. This policy includes all information provided to us — whether through our web site, through our ATMs, or over the telephone.

Bank of the Orient will occasionally update this Online Privacy Policy. Bank of the Orient encourages you to periodically review this Statement to be informed of how Bank of the Orient is protecting your information.

Our customer Privacy Policy is crafted around the following tenets:

### **Collection, Retention, and Use of Information Provided.**

Bank of the Orient collects, retains and uses information about individual customers only where it is allowed by law and the Bank reasonably believes it is useful in administering the Bank's business, and in providing products, services and other opportunities to our customer.

Should you elect to communicate with us via e-mail, we retain both the text of your message and our response as well as the domain or the source of message. This is not much different than what we do now when you write us on a piece of paper and include your return address so we can get back to you with an answer.

We want you to understand that Bank of the Orient will not obtain information to identify visitors to our Web Site personally unless they choose to provide such information to us. Though our website ignores Do Not Track signals, we do not collect personal information that identifies people who simply visit our site.

If you choose to enroll in a service through our website, such as Online Banking, nonpublic personal information is collected about you from the following:

- From you on applications or other forms (such as your name, address, social security, account number)
- From your transactions with us or others (such as account balance and payment history)

### **Information to Third Parties**

In the ordinary course of business, if you have an account or loan with us or perform a transaction with us, we may disclose information to third parties about your account(s) or the transactions you make:

- When it is necessary, helpful or customary for completing transactions to or from your account(s) or to resolve errors involving them;
- To verify the existence and condition of your account(s) to a third party, such as a credit bureau or a merchant;
- To comply with legal process, such as orders or subpoenas from government agencies or courts;
- To third party processors who assist us in providing you with deposit or loan services {Such as our VISA credit card processor}.
- If you give us written or electronic permission.
- Otherwise as permitted by law.

## **Maintenance of Accurate Information.**

It continues to be the goal of Bank of the Orient to maintain timely and accurate information about you, our valued clients. We have in place established procedures to investigate any reports of inaccuracies and to correct any information we find to be inaccurate in a timely manner.

Employee Access. At Bank of the Orient, we limit employee access to personally identifiable information to those individual employees with a legitimate business reason for knowing such information, and we require that each employee acknowledge in writing the need to protect the confidentiality of customer information.

## **Protecting Children's Privacy Online**

From our web site, we do not knowingly collect or use personal information from children under 13 without obtaining verifiable consent from their parents. Should a child whom we know to be under 13 send personal information to us, we will only use that information to respond to that child, seek parental consent, or provide parental notice. We are not responsible for the data collection and use practices of non-affiliated third parties to which our web sites may link.

For more information about the Children's Online Privacy Protection Act (COPPA), please visit the FTC web site: [www.ftc.gov](http://www.ftc.gov).

## **Links to Non Bank of the Orient sites**

We are not responsible for the information collection practices of the non-Bank of the Orient links you click to from our web page. We cannot guarantee how the third parties use cookies or whether they place on your computer cookies that may identify you personally. We urge you to review the privacy policies of each of the linked web sites you visit before you provide them with any personally identifiable information.

## **Changes in our Privacy Policies**

At Bank of the Orient we view these stated privacy principles as a living document that we will modify and amend as necessary to maintain the confidentiality of the information you share with us. They apply to individuals only, and we reserve the right to change them as we deem necessary to meet that goal.

## **How to Contact Us**

If you would like additional information, or have questions regarding Bank of the Orient's Privacy Policy, please telephone us at 1.800.881.2686 or send us an email. You may also write us, or stop by one of our many offices and discuss your questions with one of our staff.

## **Security Statement**

This Internet Banking System brings together a combination of industry-approved security technologies to protect data for the Bank and for you, our customer. It features password-controlled system entry, a VeriSign-issued Digital ID for the Bank's server, Secure Sockets Layer (SSL) protocol for data encryption, and a router loaded with a firewall to regulate the inflow and outflow of server traffic.

## **Secure Access and Verifying User Authenticity**

To begin a session with the Bank's server the user must key in a Log-in ID, verify your image and phrase then enter your password. Our system, the Internet Banking System, uses a "3 strikes and you're out" lock-out mechanism to deter users from repeated login attempts. After three unsuccessful login attempts, the system locks the user out, requiring a phone call to the Bank at 1.800.881.2686 before re-entry into the system. Upon successful login, the Digital ID from VeriSign, the experts in digital identification certificates, authenticates the user's identity and establishes a secure session with that visitor.

## **Unsolicited E-Mail**

Bank of the Orient does not send unsolicited e-mail messages or place pop-up advertisements that request personal borrower or depositor information such as your Bank of the Orient account number(s) or account password(s), or your social security number.

If you receive an e-mail requesting your personal information from someone claiming to be a representative of Bank of the Orient, and you did not originate the message, do not respond. If you see a pop-up advertisement for Bank of the Orient that requests personal information, do not click the advertisement. You need to call the Bank at 1.800.881.2686 immediately to report the contact.

## **Keeping your account information safe**

- Your Login ID and Password are confidential and you should exercise care when using them. Don't make your password something easily determined by an unauthorized person.
- Never lend your Login ID or Password to anyone and never write it on your PC or computer materials.
- Never accept advice from strangers while you are using your Login ID and Password.
- Beware of fraudulent request for your password by someone posing as a Bank employee. A Bank employee would never ask for this information!
- Never use a "Save Password" feature if offered by your browser. (This is a feature available on Microsoft Explorer 5.0). This would allow anyone who opens your browser access to your account information without needing a password.

## **Secure Data Transfer**

Once the server session is established, the user and the server are in a secured environment. Because the server has been certified as a 128-bit secure server by VeriSign, data traveling between the user and the server is encrypted with Secure Sockets Layer (SSL) protocol. With SSL, data that travels between the bank and customer is encrypted and can only be decrypted with the public and private key pair. In short, the Bank's server issues a public key to the end user's browser and creates a temporary private key. These two keys are the only combination possible for that session. When the session is complete, the keys expire and the whole process starts over when a new end user makes a server session.

## **Router and Firewall**

Requests must filter through a router and firewall before they are permitted to reach the server. A router, a piece of hardware, works in conjunction with the firewall, a piece of software, to block and direct traffic coming to the server. The configuration begins by disallowing ALL traffic and then opens holes only when necessary to process acceptable data requests, such as retrieving web pages or sending customer requests to the bank. Using the above technologies, your Internet banking transactions are secure.

Unauthorized attempts to upload or change information on this web site are strictly prohibited and are subject to prosecution under the Computer Fraud and Abuse Act of 1986 and Title 18 U.S.C. Sec. 1001 and 1030.

## **Mobile Text Messaging**

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

# **CUSTOMER IDENTIFICATION PROGRAM**

## **Opening A New Account at Bank of the Orient**

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 Bank of the Orient customers**

When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Thank you for your cooperation in this important matter.