

## OUR POLICY ON PRIVACY

Avidbank is committed to protecting the confidentiality of the non-public personal information entrusted to us by our clients, employees and potential clients. Non-public personal information is information such as name, account number and social security number not available from public sources.

We will obey all applicable laws respecting the privacy of non-public personal information. We continually review and test our policies, procedures and technology to insure that this information is safeguarded to our satisfaction and as required by the Gramm-Leach-Bliley Act and other regulations.

We take a number of steps to ensure that non-public personal information is adequately safeguarded including the implementation of a variety of physical and electronic security features to prevent unauthorized access, limiting access to client information to those employees and service providers who reasonably need such information to perform their duties and conducting periodic reviews of the security features of our computer systems.

We only collect non-public personal information that we receive on applications for our products or services, that results from processing client transactions, that is obtained from a consumer reporting agency, such as a credit bureau and in response to requests made by third parties about you or to confirm information that you have provided to us on account applications.

We do not provide non-public personal information to affiliates or third parties for marketing or solicitation purposes.

We do provide non-public personal information to our service providers whom we use for business purposes. When we provide this information to anyone outside our organization we only do so as required or permitted by law. We require all of our service providers to agree to maintain our non-public personal information in confidence, to limit the use and dissemination of the information to the purpose for which it is provided and to abide by the law. We monitor that each outside vendor and service provider receiving non-public personal information from us complies with our confidentiality requirements.

We may disclose client information when requested by the client, when informing you of other products or services, when necessary to verify or complete a client-initiated transaction, when verifying the existence and condition of your account for a third-party, such as a merchant, another financial institution or a credit bureau, when assisting a third-party in performing functions on behalf of the Bank or when complying with law, regulation or a court or government order or request.

We apply the same privacy policies and practices to our former clients that we do to our existing clients. All collected information is retained in accordance with Federal law. We recognize the importance of maintaining accurate client information. If you ever notice that your information is inaccurate, please contact us.

We educate all our employees about these privacy principles and their obligation to maintain the confidentiality of client information as described in this policy and our Code of Conduct and we take appropriate disciplinary measures to enforce this obligation. Our employees are required to acknowledge their responsibility to maintain the confidentiality of client information through an annual signed statement.

If you have any questions regarding this policy, please contact us at: 650.843.2265.



## FACTS

### WHAT DOES AVIDBANK DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and account balances
- Transaction history
- Credit history and overdraft history

When you are *no longer* our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Avidbank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Avidbank share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	No	We don't share
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

#### Questions?

Call 650-843-2265 or go to [www.avidbank.com](http://www.avidbank.com)

## Who we are

Who is providing this notice?

Avidbank

## What we do

How does Avidbank protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We have implemented a variety of physical and electronic features to prevent unauthorized access to client information.

How does Avidbank collect my personal information?

We collect your personal information, for example, when you

- open an account or apply for a loan
- show your driver's license or give us your contact information
- make deposits or withdrawals from your account

We also collect information from consumer credit reporting agencies and ChexSystems, a network for reporting checking account issues.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *We do not share information for marketing purposes.*

## Other important information