

Privacy Policy

On-Line Banking Privacy Policy and Disclosure

At Santa Cruz County Bank we understand the importance of protecting the confidentiality of your personal information. The purpose of this policy is to protect your personal information on the Internet the same way we have when you conduct business with us in a branch office, over the phone, or through an ATM.

The following section explains our "Policy Principles" regarding any personal information you might supply to us when you visit our Internet Site.

Website Privacy Policy

Santa Cruz County Bank is committed to respecting and protecting the personal privacy of our customers and those who visit our website. Our website collects only anonymous data such as the volume of traffic to the server and the number of visitors a certain section of the site receives each month.

How does Santa Cruz County Bank comply with the Children's Online Privacy Protection Act (COPPA) of 1998?

Santa Cruz County Bank does not use its Web site to collect any personally identifiable information from children under 13 years of age. Any interface that requests personally identifiable information that appears on an interface that can be expected to be viewed by children less than 13 years of age is accompanied by a notice that submissions cannot be accepted from users less than 13 years of age. Providing personal information is never a prerequisite for accessing any of the content or resources on this Web site. Specifically, refusal to provide personal information via a Web interface will never result in a user being denied access to any on-line content or resource the user would be able to access were the information submitted.

Recognition of Your Expectation of Privacy

We recognize that you expect privacy and security for your personal and financial affairs and we have established policies and procedures to prevent misuse of our customers' confidential and private information.

Our Collection, Retention, and Use of Information about You

Santa Cruz County Bank 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 customers. We use information to protect and administer your records, accounts, and funds; to comply with certain laws and regulations; to help us design or improve our products and services; and to understand your financial needs so that we can provide you with quality products and superior service.

Santa Cruz County Bank does not currently sell data. Also, we do not have any future plans to change our policy on selling data. In the event that Santa Cruz County Bank begins to sell customer data, the customer will be notified and presented with the opportunity to "opt out," whereupon that customer's personal data will not be sold.

At your request, we will tell you what information is retained and why it is needed. See "Contact Information Regarding Privacy or Confidentiality Issues" at the end of this document.

Our Maintenance of Accurate Information

We have procedures to help ensure that your financial information is accurate, current, and complete in accordance with commercial standards. Our procedures include steps for responding to customer requests to correct inaccurate information in a timely manner and processes to update information and remove old information if necessary.

Limiting Employee Access to Information

Santa Cruz County Bank limits access to our customers' confidential and private information to employees with legitimate business reasons for knowing such information. We educate our employees about the importance of confidentiality and customer privacy, and we take appropriate disciplinary measures to enforce employee privacy responsibilities.

Security Procedures to Protect Information

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We maintain security standards and procedures to help prevent unauthorized access to confidential information about you. We update and test our technology to improve the protection of our information about you and to assure the integrity of our information.

Restrictions on Disclosure of Account Information

We do not reveal specific information about our customers or their transactions to unaffiliated third parties for their independent use, unless it is:

- To help complete a customer-initiated transaction
 - To help administer the institution's bona fide business
 - At the customer's request
 - To comply with a legal requirement, such as a subpoena
 - To a reputable information reporting agency, such as a credit bureau
 - After the customer has been informed about the possibility of such disclosure through a prior communication and has been given the opportunity to decline, or "opt out."
- Maintaining Customer Privacy in Business Relationships with Third Parties

Whenever we do provide specifically identifiable customer information to a third party, we require that the third party protect the confidentiality of this information and that they adhere to similar "Privacy Principles."

Disclosing Our Privacy Commitment to You

We want to be sure that you understand our commitment to personal privacy and our use of information. Santa Cruz County Bank has published these "Privacy Principles" so that our customers may have a better understanding of our commitment to safeguarding confidential and private information.

SANTA CRUZ COUNTY BANK CUSTOMER RESPONSIBILITIES

Our customers are required to utilize specific passwords for online access to confidential and private information.

It is critical that our customers take their responsibility to safeguard login IDs and passwords very seriously. Our commercial customers should carefully screen those employees to whom user IDs and passwords are granted.

Our online banking customers are reminded that we may have links within our website to other websites that are not under our control and may not necessarily comply with Santa Cruz County Bank's "Privacy Principles" and security standards.

If any of our customers believe that confidential and private information has been compromised, please contact us immediately so that the potential breach can be investigated.

Contact Information Regarding Privacy or Confidentiality Issues

For any comments or complaints about this policy, any privacy-related issue or any inaccuracy in customer data, please contact:

Privacy Officer
 Santa Cruz County Bank
 P.O. Box 8426
 Santa Cruz, CA 95061
 Tel. (831) 457-5000
 Fax (831) 457-5001

Any material changes to this Policy will be posted to the Bank's "What's New" section of its website.

| FACTS | WHAT DOES SANTA CRUZ COUNTY BANK 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: <ul style="list-style-type: none"> • Social Security number and income • Account balances and payment history • Credit history and account transactions |
| 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 Santa Cruz County Bank chooses to share; and whether you can |

reasons Santa Cruz County Bank chooses to share, and whether you can limit this sharing.

| Reasons we can share your personal information | Does Santa Cruz County Bank share? | Can you limit this sharing? |
|---|------------------------------------|-----------------------------|
| For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | yes | no |
| For our marketing purposes - to offer our products and services to you | yes | no |
| For joint marketing with other financial companies | no | we don't share |
| For our affiliates' everyday business purposes - information about your transactions and experiences | no | we don't share |
| For our affiliates' everyday business purposes - information about your creditworthiness | no | we don't share |
| For nonaffiliates to market to you | no | we don't share |

| | |
|-------------------|---|
| Questions? | Call (831) 457-5000 or go to www.sccountybank.com or email us at info@sccountybank.com |
|-------------------|---|

| Who we are | |
|-------------------------------|------------------------|
| Who is providing this notice? | Santa Cruz County Bank |

| What we do | |
|---|--|
| How does Santa Cruz County Bank 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. |
| How does Santa Cruz County Bank collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account or deposit money • Pay your bills or apply for a loan • Use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p> |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • 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 <p>State laws and individual companies may give you additional rights to limit sharing.</p> |

| Definitions | |
|------------------------|---|
| Affiliates | Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • Santa Cruz County Bank has no affiliates. |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • Santa Cruz County Bank does not share with nonaffiliates so they can market to you. |
| Joint marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> • Santa Cruz County Bank does not jointly market. |

Privacy
Policy



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