

## Privacy Policy

Verus Bank of Commerce recognizes the importance of customer privacy, while at the same time the need to utilize information about them to administer our business and to provide them with information concerning our products and services. The maintenance and confidentiality of this information is one of our highest priorities, and to ensure this confidentiality we have adopted the following privacy principles:

**Keeping Customer Information Secure.** We recognize customers' expectations of privacy and security regarding personal and financial information and the need to keep that information secure. In order to safeguard this sensitive information within our organization, we have implemented standards and procedures designed to protect and prevent unauthorized disclosure and/or misuse of this information. Our privacy policy includes not only written files, but also personal information provided to us and transactions conducted on-line, including information provided when a customer requests or signs up for and uses any of our accounts or services, including account access and bill paying through our on-line banking services, or when a customer sends us e-mail. See the Security page of our website for more information about our security measures.

**Retention and Use of Information.** We collect, use and retain information about customers to identify and communicate with them, to provide them with products and services they have requested, to help us respond to questions from customers, and to inform customers about other financial services that may be of interest to them. We also use this information to comply with certain laws and regulations that may apply to us, and to help us design or improve our products and services. We collect information about customers only for specific purposes and, upon customer request, we will inform customers of the reason for asking personal information.

**Maintenance of Accurate Information.** We have procedures to see that client information is maintained in a commercially reasonable manner so that it is accurate, current, and complete. We also have procedures to see that requests to correct inaccurate or incomplete information are acted upon in a timely manner. We maintain security standards and procedures to help prevent unauthorized access to confidential client information, and we regularly review, test and update our technology and procedures to improve the security and accuracy of such information. We investigate client inquiries about information received from a credit bureau reflecting information we have provided that the customer believes to be inaccurate and we take steps to correct information we determine to be incorrect.

**Limiting Employee Access to Information.** Each of our employees has the responsibility for maintaining the confidentiality of client information. The company requires all of its employees to protect the confidentiality of client information and to use it only for bank purposes. We have policies and security procedures to limit employee access to personal client information to those employees with a business reason to know such information. Internal access and sharing of information about customers within various service departments of the company occurs only to the extent appropriate to evaluate, structure, and facilitate the services that the customer has requested or to inform the customer of other financial services that may be of interest to him/her. We train our employees to recognize the importance of client confidentiality, and we take appropriate disciplinary measures to enforce employee privacy responsibilities.

**Disclosure of Consumer Account Information to Others.** We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms.
- Information about your transactions with us.
- Information we receive from consumer reporting agencies.

Except for California residents, we may disclose all of the information we collect, as described within the three bullet points above, to non-affiliated companies that perform marketing services on our behalf or to other non-affiliated financial institutions with which we have joint marketing agreements.

We do not disclose any other nonpublic personal information about you to anyone else, except as permitted by law.

We restrict access to nonpublic personal information about you to our employees who need the information to properly service your account(s), act upon your requests, or to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

**How - and why - information is shared.** We limit who receives information and what type of information is shared. We do not reveal specific information about your accounts or other personally identifiable data to parties outside our banks and companies for their independent use unless: (1) you request or authorize it; (2) the information is provided to help complete a transaction initiated by you; (3) the information is provided to a reputable credit bureau or similar information reporting agency; or (4) the disclosure otherwise is lawfully permitted or required. We do not sell or provide account or personal information to companies for the purpose of independent telemarketing or direct mail marketing of any non-financial products or services of those companies.

FACTS	What does Verus Bank of Commerce 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 Income  Account balances and Transaction history

	-ACCOUNT BALANCES AND TRANSACTION HISTORY	
	-Asset and Credit history	
	When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.	
<b>How?</b>	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 Verus Bank of Commerce chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>	<b>Does Verus Bank of Commerce share?</b>	<b>Can you limit this sharing?</b>
<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	<b>Yes</b>	<b>No</b>
<b>For our marketing purposes—</b> To offer our products and services to you	<b>Yes</b>	<b>No</b>
<b>For joint marketing with other financial companies</b>	<b>No</b>	<b>We don't share</b>
<b>For our affiliates' everyday business purposes—</b> Information about your transactions and experiences	<b>Yes</b>	<b>No</b>
<b>For our affiliates' everyday business purposes—</b> Information about your credit worthiness	<b>No</b>	<b>We don't share</b>
<b>For non-affiliates to market to you</b>	<b>No</b>	<b>We don't share</b>
<b>Questions?</b>	<b>Call 970-204-1010 or go to <a href="http://www.verusboc.com">www.verusboc.com</a></b>	

<b>Who we are</b>	
<b>Who is providing this notice?</b>	<b>Verus Bank of Commerce</b>
<b>What we do</b>	
<b>How does Verus Bank of Commerce protect my personal information?</b>	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 restrict access to your personal information to our employees who need the information to properly service your account(s), act upon your requests, or to provide you products or services.
<b>How does Verus Bank of Commerce collect my personal information?</b>	We collect your personal information, for example, when you -Open an account or Deposit money -Pay your bills or Apply for a loan -Use your credit or debit card  We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only -sharing for affiliates' everyday business-information about your creditworthiness  -affiliates from using your information to market you

	-sharing for non-affiliates to market you  State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies.  <i>-Our affiliates' include companies with a common ownership by Verus Acquisition Group, Inc.</i>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  <i>-Verus Bank of Commerce does not share with non-affiliates so they can market you.</i>
<b>Joint Marketing</b>	A formal agreement between non-affiliated financial companies that together market financial products or services to you.  <i>-Verus Bank of Commerce does not jointly market.</i>
<b>Other important information</b>	
<b>Special Notice For State Residents</b>	
For California residents:  In accordance with California law, we will not share information we collect about you with companies outside of our corporate family, except as permitted by law, including, for example, with your consent or to service your account. We will limit sharing among our companies to the extent required by California law.	

The information provided is effective as of 9/11/13. These principles apply to individuals and we reserve the right to amend them, along with related provisions, at any time.

Notice of Changes in Temporary FDIC Insurance for Transaction Accounts.

NOTICE: Verus Bank of Commerce is not responsible for and has no control over the subject matter, content, information, or graphics of the web sites that have links here. The bank is not responsible for the content. Please [contact us](#) with any concerns or comments.

