

## Policy Statement

First Dakota National Bank establishes this policy for the confidentiality of both the financial records and any relationship between First Dakota National Bank and our customers. No employee other than those authorized shall divulge financial information or records of a customer to anyone outside the bank. First Dakota National Bank will cooperate with governmental agencies when they have properly submitted legitimate requests for information.

First Dakota National Bank understands the special duty financial institutions have with safeguarding their customer's sensitive information. Though this information may be required to be obtained by law or sought by the institution for proper business purposes, such personal information is also vital to the bank's ability to provide its customers with quality service.

## Overview

We recognize the reasonable expectation of privacy for all of our customers and the importance of protecting that privacy. As a result, the following code of conduct has been implemented by First Dakota National Bank, here and after collectively referred to as "we/our/us":

- We recognize and respect our customer's expectation of privacy. This involves being sensitive to how customers want or don't want their information to be used or shared. We will make available and/or explain information about privacy protection to our customers upon request.
- We will only collect and retain information that is useful (and allowed by law) to the customer's interests and bank's business interests. We will not collect unnecessary information.
- We have established procedures to ensure that a customer's financial information is accurate, current, and complete in accordance with reasonable commercial standards. We will respond in a timely manner to requests to correct inaccurate information.
- We limit employee access to personally identifiable information to those with a business reason for knowing such information. We educate our employees so that they understand the importance of confidentiality and customer privacy. We will also take disciplinary measures to enforce employee privacy responsibilities.
- We have established security standards and procedures to protect customer information from unauthorized use, whether inside or outside the bank.
- We have placed restrictions on how customer account information can be disclosed. We will not reveal specific information about customer accounts or other personally identifiable data to unaffiliated third parties unless:
  - A legitimate business purpose has been established. The information is exchanged with a reputable information-reporting agency. The information is provided to help complete a customer initiated transaction. The customer requests it. The disclosure is required by/or allowed by law (i.e. subpoena, investigation of fraudulent activity, etc.). We do not share personal non-public information.

- If personal customer information is provided to a third party, we will expect that the third party adhere to similar privacy principles that provide for keeping such information confidential.
- We want customers to understand and be comfortable with our privacy policies. We realize and respect its importance as an issue and will respond to any request for information regarding our privacy policies and procedures.
- You may visit our website to find out about products and services, marketing information, and career opportunities without providing any information about yourself. We do gather data regarding visits to our website, including domain name, pages visited, length of user session, etc., to evaluate the usefulness of our site.
- We collect information when you use our internet banking site or mobile banking app. If you enroll in online banking or our mobile banking app, we require you to create a username and password. We will gather personal information such as you name, email address, phone number, and account number. You will be asked security questions. Once your online banking profile is created we will retain information necessary to allow you to use our online service or mobile banking app such as your account number, IP Address and mobile phone number.
- If you apply for a new account online, we will collect and retain Personal Information including your name, address, phone number, Social Security Number, Date of Birth, email address and other credit verification information.
- We have implemented commercially reasonable security system(s) to protect the personal information gathered by our online banking or mobile banking app. The information sent to us through these systems is encrypted during transmission.
- Our website may include links to other external third party sites. These links are offered as a courtesy and convenience to our customers. We do not control third 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 external third party sites. The security and privacy policies of a third party site may be different from our policies; we recommend customers thoroughly read third party privacy and security policies.
- We may use various website analytics tools and technologies, such as Google Analytics, regarding activities on our Site that require storage of web session data. The overall aim of these tools is to aid in making our Site easy to use, to proactively identify and correct error conditions and to provide more relevant advertising and content to you. These tools and technologies are also used to assist website visitors who report problems in the use of our Site. Stored web session data is used in accordance with this privacy policy. For more information on how Google uses data, visit <http://www.google.com/policies/privacy/partners/> (please note by clicking the link you will be leaving First Dakota's website. Any products or services accessed through this link are not provided, endorsed or guaranteed by First Dakota. You are advised that First Dakota's privacy policy does not apply to the linked website and you should consult the privacy disclosures on the third-party site for further information).
- We may employ cookies (i.e., small text files) that our Site may send to your browser for storage on your hard drive, and later processes may check for the presence of such cookies. We may use such cookies to make use of our Site easier by saving your status and preferences upon visits to our Site. Most browsers are initially set to accept cookies, but you may be able to change the setting in your browser to refuse cookies, or to alert you when cookies are being sent. We may also employ cookies, web beacons, or site instrumentation, to monitor the behavior of visitors to our Site and activity on our Site, such as the number of visitors to our Site.
- Third-party service providers may also place and administer cookies and web beacons via our Site or check for the presence of our cookies on your device. Such third parties may collect your anonymized information and perform website analytics as described

in this privacy policy. We and/or such third parties may also use work product created by such third parties based upon web analytics data or other similar data collected from visitors to our Site in connection with providing you with more relevant advertising and content on our Site and on sites across the Internet. If you would like to opt out of Google's use of cookies or device identifiers, you can manage your settings on Google Ad Settings page. If you would like to opt out of third-party cookies and device identifiers you can manage your setting at the Network Advertising Initiative opt-out page.

- Children's Privacy Online: We do not knowingly collect or use personal information from children under the age of thirteen from our websites without obtaining verifiable consent from their parents. Should a child whom we know to be under the age of thirteen send personal information to us, we will only use that information to respond directly to that child, seek parental consent, or provide parental notice. We are not responsible for the data collection and use practices of nonaffiliated third parties to which our web sites may link.