

# ***PRIVACY POLICY***



09.26.23 | Responsible Party: Director of Branch Banking

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## Privacy



Protecting our client's privacy is of utmost importance to our Company and our employees. As financial service professionals entrusted with sensitive financial information, we respect the privacy of our clients and are committed to treating client information responsibly. We want our clients to understand what information we collect and how we use it. Our Privacy Policy serves as a standard for all Company employees for the collection, use, retention, and security of individual client information.

### *Categories of Information We Collect*

"Nonpublic personal information" is nonpublic information about our clients that we obtain in connection with providing financial products to our clients. For example, nonpublic personal information includes information regarding your account balance, account transactional information, and overdraft history.

We may collect "nonpublic personal information" about our clients from the following sources:

- Information we receive from applications or other loan and account forms,
- Information about our client's transactions with our Company or others; and
- Information our Company receives from third parties such as credit bureaus.

We collect and retain information about our clients only for specific business purposes - and we will tell our clients why we are collecting and retaining it upon your request. We use information to protect and administer our client records, accounts, and funds; to comply with certain laws and regulations; to help us design or improve our products and services; and to understand our client financial needs so that we can provide them with quality products and superior service. We will use this information only in accordance with the principles set out in this statement.

### *Categories of Information We Disclose*

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We are permitted under law to disclose nonpublic personal information about our clients to other third parties in certain circumstances. For example, we may disclose nonpublic personal information about our clients to third parties to assist us in servicing their loan or deposit account with us, to governmental entities in response to subpoenas, and to credit bureaus.

It is our policy not to provide account or personal information to companies not affiliated with our Company for the purpose of independent marketing of any products or services of those companies. We do not sell client information to third parties.

### *Confidentiality and Security*

The Company is committed to the security of our client's financial and personal information. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard our client's nonpublic personal information.

At The Company, employee access to nonpublic personal client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these privacy principles. Because of the importance of these issues, all Company employees are responsible for maintaining the confidentiality of client information and employees who violate these privacy policies will be subject to disciplinary measures.

**We will assume, however, that when an employee elects to send their own information via email using Company resources that that election is on them and won't be considered something that would result in disciplinary measures.**

### *Maintenance of Accurate Information*

We continually strive to maintain complete and accurate information about our clients and their accounts. We consider the accuracy of our client's personal information important in ensuring that we can provide the right products and services for their unique needs. We have procedures geared towards ensuring that the information we maintain is accurate, remaining free from alteration or destruction.

### *Protecting Our Clients Children's Information*

The online financial services offered through The Company's web site are not designed for or directed toward children under age 13. We do not knowingly solicit or collect data from children, and we do not knowingly market to children online without express parental consent or notification. If we receive online information from any child, we will only use the information to respond directly to a child's request. We recognize that protecting children's identities and online privacy is important and that responsibility rests with us and with parents.

### ***Maintaining Client Privacy in Third-Party Relationships***

When The Company conducts business with third parties, such as check printing, data processing companies or partner financial institutions, we require the partners to maintain similar standards of conduct regarding the privacy of personally identifiable client information provided to them.

### ***Commercial Client Privacy***

All descriptions in this privacy policy apply to our relationships with individuals and their personal, family, or household accounts with us. Given the different nature of relationships with businesses, not all of these privacy provisions apply to our relationships with commercial clients. While the nature of these relationships is different, we remain committed to respecting our commercial clients.

### ***Providing Privacy Information to Clients and Responding to Inquiries***

We maintain the same standards of privacy protection for our former clients as we do for current clients (including categories of information we may disclose and the categories of parties to whom we restrict our information disclosure).

At Community First Bank and HFG Trust LLC, we value our client relationships. We want them to understand how we use the information they provide and our commitment to ensuring their personal privacy.