

Charlevoix State Bank Mobile App (“App”) and Desktop Site (“Site”)-allows you to Bank conveniently and securely - anytime, anywhere!

App and Site allows you to:

- View account balances
- View your transactions and statements
- Transfer funds between accounts
- Enable account alerts
- Send and receive secure messages
- and more

This Privacy Policy is to inform you of the policies and practices regarding the collection, use and disclosure of any personal information that we and our service providers collect from or about users in connection with the website, and mobile application (The “Services”).

THE TYPES OF INFORMATION WE COLLECT IN APP AND SITE

Through your use of the Services, we may collect personal information from you in the following ways:

(a) Personal Information You Provide to Us

- We will collect personal information from you, such as your first and last name, address, email, telephone number, and social security number when you create an account.
- If you provide feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.
- We also collect other types of personal information that you provide voluntarily, such as any information requested by us if you contact us via email or secure messaging regarding support for the Services.

(b) Personal Information Collected via Technology-We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications, and other online services, such as:

- device data, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (example: phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (example: Wi-Fi, LTE, 5G), and general location information such as city, state, or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- Cookies, which are text files that websites store on your device to uniquely

identify your browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.

- Local storage technologies, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

HOW WE USE YOUR INFORMATION COLLECTED IN APP AND SITE

(a) General Use-In general, we use your personal information collected through your use of the Services to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. We use your personal information, in connection with App and Site, in the following ways:

- Facilitate the creation of, and secure and maintain your account;
- Identify you as a legitimate user in our system;
- Provide improved administration of the Services;
- Provide the Services you request;
- Improve the quality of experience when you interact with the Services;
- Send you administrative notifications, such as security or support and maintenance advisories.

(b) Compliance and protection-We may use your personal information to:

- Comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- Audit our internal processes for compliance with legal and contractual requirements and internal policies;
- Enforce the terms and conditions that govern the Service; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.

(c) Creation of Non-Identifiable Data-App and Site may create non-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties in our discretion.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We disclose your personal information collected through your use of the Services as described below.

(a) In Accordance with Our Other Privacy Notices-Other than as described in this Privacy Policy in connection with App and Site, this Privacy Policy does not apply to the processing of your information by us or third parties with whom we share information.

(b) Third Party Service Providers-We may share your personal information with third party or affiliated service providers that perform services for or on behalf of us in providing App and Site, for the purposes described in this Privacy Policy, including: to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the Services; to provide technical support; and/or to provide other services to App and Site.

(c) Authorities and Others-Regardless of any choices you make regarding your personal information, App and Site may disclose your personal information to law enforcement, government authorities, and private parties, for the compliance and protection services described above.

LINKS TO OTHER SITES

App and Site may contain links to third party websites. When you click on a link to any other website or location, you will leave App or Site and go to another site, and another entity may collect personal and/or anonymous information from you. App and Site provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites. We encourage you to read the privacy policy of every website you visit.

YOUR CHOICES REGARDING YOUR INFORMATION

You have several choices regarding use of information on the Services.

(a) How We Respond to Track Signals-Some web browsers transmit “do not track” signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise its policy on responding to these signals.

(b) Access, Update, or Correct Your Information-You can access, update, or correct your information by changing your profile or preferences in your account. For additional requests, please contact us.

(d) SAFEGUARDS AND RETENTION

We implement reasonable administrative, technical, and physical measures in an effort to safeguard the information in our custody and control against theft, loss and unauthorized access, use, modification, and disclosure.

Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information.

PRIVACY POLICY UPDATES

This Privacy Policy is subject to occasional revision. We will notify you of any material changes in its collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Policy will be effective thirty (30) calendar days following notice of the changes on the Services. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify us prior to the effective date of such changes that you wish to deactivate your account. Continued use of the Services following notice of any such changes shall indicate your acknowledgement of such changes.

CONTACT US

If you have any questions or complaints about this Privacy Policy or App's and Site's data collection or processing practices, or if you want to report any security violations, please contact us by email at: support@csbchx.com; or by mail at:

Charlevoix State Bank, 111 State Street, Charlevoix MI 49720

Last Updated: July 2022