Privacy Policy

Effective 12/31/2010

Anstaff Bank recognizes the importance our customers place on privacy and the security of their personal information. Our goal is to protect your personal information in every way that we interact with you, whether it's on the telephone, in our lobby, at one of our ATMs, or on the Internet.

We think it is important for you to be informed of the policies, procedures, and security measures we have in place to safeguard your personal and confidential information. We have developed this policy to help you to understand the steps we take to protect your personal information.

New product releases may require changes to our Privacy Policy. We will provide our customers copies of our Privacy Policy on an annual basis.

How We Gather Information

As part of providing financial products or services, we may obtain information about our customers and consumers from the following sources:

- Information we receive from you on applications, emails, or other forms;
- Information about your transactions with us, our affiliates, and others;
- Information we receive from a consumer-reporting agency; and
- Information that is generated electronically when you visit our website and use our Internet Banking.

Privacy for Internet Users

Our commitment to safeguard your privacy also extends to the Internet. If you are just browsing through our website, we do not request any personally identifiable information, nor do we collect unique identifying information about you unless you voluntarily and knowingly provide us that information, such as when you send us an email or complete an application online. If you provide us this information, it is only used internally and in furtherance of the purpose for which it was provided.

Our Internet financial services provider, Fiserv may collect general information on our website simply to help us provide banking and other financial services to you online. They collect certain information on our behalf for security and statistical purposes. The information collected for these purposes may include:

- The Internet address (referral site) which brought you to our web site;
- The date and time you access our site;
- The name and version of your web browser;
- The Internet service provider you used when you accessed our site;
- Your Internet Protocol (IP) address; and

• The pages visited in our website.

Fiserv may use cookies to collect this general information on the website. They also use cookies for security purposes in our Internet Banking service.

In the future, we may use aggregate, general, non-personally identifiable information to help us market our products and services that may be of interest you.

Additional information about IP addresses and cookies are provided below.

Internet Protocol (IP) Addresses

An IP address is a number that's automatically assigned to your computer whenever you're on the Internet. Web servers, the computers that "serve up" Web pages, automatically identify your computer by its IP address.

When collecting information for us, Fiserv does not link IP addresses to anything personally identifiable, which means that a user's session will be logged, but the user remains anonymous. Fiserv may use IP addresses to audit the use of our site. They can and will use IP addresses to identify a user when necessary for security purposes.

What is a Cookie?

A cookie is a very small text file sent by a web server and stored on your hard drive, your computer's memory, or in your browser so that it can be read back later. Cookies cannot "read" information about you from your computer or be used to "steal" information about you; and cookies don't carry viruses. Cookies are a basic way for a server to identify you (most cookies actually identify the computer you happen to be using at the time, not you personally). Cookies are used for many things from personalizing start up pages to facilitating on-line purchases. Cookies help sites recognize return visitors and they perform a very important function when you engage in secure Internet banking. For your security, we do not store any of your personal information in our cookies. The cookies used in our Internet banking system are further described below.

Internet Banking Cookies

Fiserv uses encrypted cookies that do not pass to your computer's hard drive. Instead, the cookie is stored in your computer's memory, identifying only your computer while you are logged on. Only Fiserv can read the information in these cookies. This Internet banking cookie allows Fiserv to process multiple transactions during your session without requiring you to reenter your pass code for each individual transaction. The cookies for Internet banking simply provide another level of security for our Internet banking product. When you log off, or close your browser, the cookie is destroyed. A new cookie is used for each session. That way, no one can use the prior cookie to access your account. For additional security, the cookie expires after 15 minutes of inactivity. It must then be renewed by reentering your pass code. Fiserv does not (and cannot) use

this cookie to collect or obtain new personal information about you. You must allow your browser to accept this cookie so you can use the Internet banking system.

Disclosure of Information

- We do not disclose any nonpublic personal information about our customers, former customers or website visitors to anyone, except as permitted by law.
- We must provide certain customer account information to service providers such as Fiserv so that we may process your Internet banking transactions.
- We do not sell any of your personal information.
- We will not disclose any medical information that you provide to us, unless you specifically authorize its disclosure.

Email Policies

In the future we may send you email notices for certain disclosures if you choose to accept electronic disclosures or statements. We may also send you email to market our products and services that may be of interest you. We may also provide you an opportunity to subscribe to a newsletter; however, we will always provide you an opportunity to opt-in or opt-out of these advertising promotions if required by law. Fiserv may send these emails as an agent on our behalf.

Security

Anstaff Bank has developed strict policies and procedures to safeguard your personal information. We restrict employee access to your sensitive personal information to a "need to know" basis. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information. We educate our employees about the importance of confidentiality and customer privacy. We take appropriate disciplinary measures to enforce employee privacy responsibilities. We recommend that you contact us in person or on the phone to discuss sensitive personal information and not email it to us. We view mail as a convenient means of communication but it is not secure.

Our Internet Banking service provider, Fiserv has also developed security policies and procedures to protect the customer information that they must collect and maintain to help us process your banking transactions over the Internet. They have developed a top-of-the line security system to ensure your customer information is protected on the Internet and within the Fiserv environment.

Privacy of Children

Anstaff Bank respects the privacy of children. We do not knowingly collect names or any other personally identifiable information from children. We do not knowingly market to children nor do we allow children to open accounts on-line without parental consent.

Questions

If you would like to know what information we have collected in connection with your use of our products and services, including Internet based products and services, please contact us at 870.438.5214.

After reviewing the information, if you believe any of the information is in error, contact us either by phone or email at <u>info.3@anstaffbank.com</u>. You can also send us a letter that explains the alleged discrepancy. If the information is incorrect, we will work with you to ensure your information is promptly updated.

In addition, if you believe any information that Anstaff Bank or Fiserv has collected about you has been used for an improper purpose; please contact us at <u>info.3@anstaffbank.com</u>. Explain your concerns in as much detail as possible so that we may take any appropriate action.

Fair Credit Reporting Act

We do not disclose nonpublic personal information about you to our affiliates.