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## Privacy Policy

First Minnetonka City Bank

*For all life's moments,  
bank among friends.*

## First Minnetonka City Bank's Privacy Policy

*The collection, storage and sharing of customer information is an important part of delivering useful banking products and services to consumers. To serve you as a customer, efficiently and conveniently, we make use of modern technology to retain and protect customer information. We know that you are concerned about privacy and our use of information you give us. We are committed to ongoing review of our procedures and policies in the interest of protecting your privacy. To that end, we have established these privacy principles to provide guidance in our dealings with consumers.*

*The policies and procedures described herein shall remain in effect and shall not be modified without first providing you with advance notification of the change. Notwithstanding such notice, these policies and procedures shall continue to govern our use of nonpublic personal information even should you discontinue your relationship with us. If you have any questions with regard to these policies and procedures contact Kevin Geraghty, our Compliance Officer, at 952.935.8663.*

We understand that you expect us to maintain proper safeguards to protect your privacy and the confidential information you provide to us. We have established policies and procedures to help prevent misuse of that information.

### **WE COLLECT, USE AND RETAIN INFORMATION ABOUT YOU ONLY FOR LEGITIMATE BUSINESS PURPOSES.**

We may obtain nonpublic personal information\* about you from many sources. These sources may include:

- a. Information provided to us by you on applications and other forms
- b. Information regarding your transactions with us or resulting from your use of our products and services
- c. Information about your transactions with nonaffiliated third parties, and
- d. Information derived from a consumer reporting agency.

We in turn gather, use and maintain this information about you only if we believe:

- a. It is necessary or useful as part of our relationship with you, or
- b. It will serve your interests, or
- c. It will help us provide you with products and services meeting your needs, or
- d. It is required by law or regulation.

\* Nonpublic personal information is personally identifiable information about you or your transactions that would not otherwise be available through alternative public sources.

# First Minnetonka City Bank's Privacy Policy

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## **WE DO NOT DISCLOSE PERSONAL NONPUBLIC INFORMATION TO NONAFFILIATED THIRD PARTIES FOR THEIR INDEPENDENT USE UNLESS:**

- a. Such disclosure is authorized by you, or
- b. It is disclosed for the business purposes outlined below, or
- c. You have been notified in advance and given the option to opt out of the disclosure.

## **WE STRIVE TO ENSURE THAT OUR RECORDS ARE UP TO DATE AND ACCURATE IN ACCORDANCE WITH COMMERCIAL STANDARDS.**

We have procedures in place for maintaining and updating information about our customers. We also have procedures for timely correction of inaccurate information after we become aware of the inaccuracy. In addition, various state and federal laws impose specific obligations and standards on us with respect to the accuracy of information we maintain, and the correction of erroneous information.

## **WE HAVE POLICIES AND PROCEDURES ADDRESSING EMPLOYEE ACCESS TO INFORMATION ABOUT YOU.**

We have procedures in place intended to limit employee access to personal nonpublic information about you. Employee access to this information is limited to those employees who, because of their positions or responsibilities, have a business reason

to know or have access to such information. Our employees are informed of their responsibility to protect confidential information you give to us. All of our employees are bound by our Code of Ethics, which addresses the importance of confidentiality and customer privacy.

## **WE MAINTAIN STANDARDS AND PROCEDURES INTENDED TO HELP PREVENT UNAUTHORIZED ACCESS TO INFORMATION ABOUT YOU.**

In accordance with commercial standards, we have established security procedures and safeguards, intended to prevent access to your confidential information by unauthorized persons. We periodically upgrade and test these security procedures and safeguards.

## **WE LIMIT DISCLOSURE OF INFORMATION TO AFFILIATES AND NONAFFILIATED THIRD PARTIES**

From time to time we may share the following nonpublic personal information about you with our affiliates, companies that perform marketing services on our behalf, and other financial institutions with whom we have joint marketing agreements. We do this in order to offer additional financial products and services, when we have reason to believe these products or services will be of interest to you based on:

- a. Information that you have provided to us such as your name, address, assets, income, etc.

- b. Information about your transactions with us or our affiliates based on account balances, maturities, payment histories, products mix, etc.

It is also sometimes necessary for us to disclose confidential customer information to nonaffiliated third parties for the purpose of:

- a. Supporting products and services that we provide, or
- b. Processing your authorized transactions, or
- c. Safeguarding the security of the bank and its customers, or
- d. Other business purposes allowed by law.

Such information is only shared to the extent necessary and we require those third parties to agree to safeguard confidential information about you and to observe all applicable laws and regulations about privacy, except to the extent required by federal or state law to the contrary.

In order to provide a wider range of financial products to our customers, the bank may from time to time disclose nonpublic personal information you have given us or about you or your relationship with the bank to members of the bank's staff, authorized to act on behalf of a third party investment broker. The information so provided will only be used by those employees to identify customers with a potential interest in various insurance and investment products and will not be disclosed to the brokerage firm for their independent use.

## **WE DISCLOSE INFORMATION WHEN REQUIRED BY LAW OR REGULATION.**

There are many state and federal laws that require us to disclose information to various government entities. Some examples of these laws are the Bank Secrecy Act, the Internal Revenue Code, and the Right to Financial Privacy Act. There are many other laws and regulations that require us and our contractors and service providers to disclose information. In addition, if you are involved in a legal proceeding, state and federal law provide the parties to the litigation with the right to obtain records and information from us. In all these instances, we will disclose the information whenever required to do so by law, regulation, lawful judicial or administrative process, or court order.



*To protect your personal information, we review our policies and test our procedures regularly.*