

Customer Confidentially Policy

Policy Statement

It is the policy of First Dakota National Bank that both the financial records of our customers and the relationships between First Dakota National Bank and our customers are confidential. No employee other than those authorized shall divulge financial information or records of a customer to anyone outside the bank. It is also the policy of First Dakota National Bank to cooperate with governmental agencies in their properly-made, 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:

- 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.). The customer has been informed about the possibility of such disclosure for marketing or similar purposes through a prior communication and is given the opportunity to decline (opt out). First Dakota does 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 web site 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 web site, including domain name, pages visited, length of user session, etc., to evaluate the usefulness of our site.
- Our website may include links to other external third party sites. These links are offered as a courtesy and convenience to our customers. First Dakota National Bank does 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.
- The bank may use a software "cookie" when accessing our PC banking product. No "cookie" will contain any information that would enable anyone to contact you via telephone, email, or U.S. Mail. (A "cookie" is a small piece of information which a web site stores in the web browser of your PC and can later retrieve. A "cookie" cannot be read by a web site other than the one that set the "cookie". You can set your web browser to inform you when "cookies" are set or to prevent "cookies" from being set.)
- **Children's Privacy Online:** We do not knowingly collect or use personal information from children under 13 from our web sites without obtaining verifiable consent from their parents. Should a child whom we know to be under 13 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.