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OUR PRIVACY POLICY



The Citizens Banking Company ("Citizens Bank")

Privacy Policy

The Citizens Banking Company and its employees understand the importance of protecting the personal privacy of our individual customers. We value our relationship and intend to maintain your continued faith and trust. Accordingly, we commit to keeping your information secure and confidential. To do so, we regularly review our privacy and security practices and have developed a set of guidelines that we follow. We will adhere to the privacy policies and practices as described if you decide to close your accounts or become an inactive customer.

System Security

One way that we protect your information is by maintaining security standards and procedures that comply with federal guidelines. Our system security is designed to prevent unauthorized access to customer information. We regularly review and assess new technology for protecting the integrity of your information. The bank has specific procedures that limit access to your information. Our employees must have a legitimate business reason to access or use any customer information. Through ongoing training, we emphasize to our employees the importance of your privacy.

Information Collection

In the course of processing transactions and providing you with service, we collect, retain and use information about you. This information often includes certain "nonpublic" information that we may obtain in connection with providing a financial product or service to you. Nonpublic personal information includes information like your account balances, investments, income, payment history and overdraft history.

We collect information about you from the following sources:

- Information from applications, other requests, or forms completed for loans, service, accounts, investments and insurance products;
- Information about your transactions with us, affiliates or service providers and others; and
- Information we receive from third parties such as title companies, appraisers and credit bureaus.

The information is collected, used and retained so we can transact business with you, and to provide and offer other products and services to you. We work very hard to insure the accuracy of our information. However, if you are concerned that your information is incomplete or inaccurate, please call or write to us at the telephone number or address listed on your account statement or contact us at (888-645-4121).

Information Sharing

The Citizens Banking Company does not disclose nonpublic personal information about our customers or former customers to nonaffiliated third parties, except as permitted by law. We work with a variety of third parties to bring you financial services. We disclose information about you as necessary to fulfill these third party service arrangements. The information that we may share about you includes certain nonpublic personal information as described under the heading "Information Collection" above. We limit the ways we share information to the purposes permitted by law. The permissible information sharing exceptions fall into three categories:

Servicing and Joint Marketing: We share information with companies that perform services on our behalf, like check printers. We also share information with companies that we hire to help us market our products and services. We are able to offer you a broader selection of product and service options to help you achieve your financial goals when we contract with select financial institutions that offer financial services. Any information shared for servicing or joint marketing is pursuant to an agreement with the third party that requires them to adhere to strict confidentiality terms. They are not permitted to use information provided to them for any purpose whatsoever other than for the specific reason it was provided to them by the Bank.

Processing and Servicing Transactions: Information is shared, as necessary, to service and process financial products and services that are requested by you, such as wire transfers or loan applications. Information also is shared in connection with maintaining and servicing your accounts, such as statement preparation, complaint resolution, or debt collection.

Other Lawful or Required Purposes: This category includes a variety of permissible sharing situations, such as when you request or consent to have information shared, or when we share information with our auditors, attorneys or accountants, government regulators, in response to subpoenas, and other circumstances where sharing information is permitted or required by law.

Because we already limit the sharing of your nonpublic personal information as outlined above, no action is required on your part to limit such sharing.

We are permitted by law to share information or data about our experiences and transactions with you or your accounts with affiliates. We also may share additional information such as application information and credit bureau information with our affiliated companies. Affiliates share our commitment to the privacy of your nonpublic personal information. If we share your nonpublic personal information with another member of our family of companies, we would only do so to serve you more efficiently and make it easier for you to do business with us. Since your financial needs change and our financial products are continually developing, we may contact you to determine if we can offer an additional or new service to you.

Fair Credit Reporting Act Disclosure

Under the Fair Credit Reporting Act you may direct us not to share certain credit information with our affiliates. Examples of the kind of credit information that you may direct us not to share include the nonpublic personal information you provide in your application or that we obtain about you from nonaffiliated third parties such as credit bureaus. If you do not want such information shared you may write to us at, The Citizens Banking Co., 100 E. Water St., Sandusky, Ohio 44870, Attention: Compliance Officer or call 1-888-645-4121. Please provide your name, address, social security number and account number(s).

(NOTE: If you have previously requested that we restrict such sharing you do not need to make another request.) Your request not to share credit information does not include information we are permitted to share by law, such as information related solely to our experiences or transactions with you. Your account balance and payment history are examples of transaction and experience information that we are always permitted to share with our affiliates.