

Policy For:	Consumer Privacy
Board Approved:	February, 2001
Last Revision Date:	June 2023
Department/Individual Responsible For Maintaining/Updating Policy:	Director of Compliance

CONSUMER PRIVACY POLICY

POLICY STATEMENT

Protecting individual privacy is important to Reliabank Dakota and its employees. In order to provide our customers with a broad range of financial products and services as effectively and conveniently as possible, we use technology to manage and maintain customer information. It is the policy of Reliabank Dakota, and all of its employees, to comply with all Federal and State laws pertaining to the privacy, security, and confidentiality of customer information and customer financial records.

The general purpose of Regulation P (GLBA) is to inform consumers of the Bank's policies and practices of disclosing nonpublic personal information to nonaffiliated third parties and to provide them with the option of opting out. The rules apply only to information about individuals who obtain financial products or services to be used for personal, family, or household purposes.

Reliabank provides clear and conspicuous privacy notices, as required, to customers that reflect our privacy policy and practices regarding nonpublic personal information.

Responsibilities

The Board of Directors has the ultimate responsibility to ensure the proper management of the Bank's Privacy Program. To this end, the Board of Directors has charged Senior Management with the responsibility to determine the necessary course of action to ensure adherence to appropriate laws and regulations is managed in an effective and consistent manner for the entire organization.

Senior Management, in addition to the Compliance personnel, are responsible for the supervision and overall management of the Bank's Privacy Program.

INFORMATION WE COLLECT

Non-public personal information is defined as:

1. Personally identifiable financial information; and
2. Any list, description, or grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable information that is not publicly available.

Personally Identifiable Financial Information may be collected from the following sources and is defined as any information:

1. A consumer provides to the bank to obtain a financial service or product. Including (but not limited to) any information provided on a loan or deposit application.
2. About a consumer resulting from any transaction involving a financial product or service between the Bank, affiliates, or others, and a consumer. This would include payment or overdraft histories, purchase information with a debit or credit card, and account balances; or
3. The bank obtains in connection with providing a financial product or service. This would include information obtained from third parties such as a consumer reporting agency or verified by an employer or another bank.

INFORMATION WE DISCLOSE

We do not disclose nonpublic personal information about customers to nonaffiliated third parties except as permitted by law.

We are permitted under law to disclose nonpublic personal information about customers to other third parties in certain circumstances. We may disclose information to companies that perform marketing services on our behalf, to other financial institutions with which we have a joint marketing agreement, to third parties to assist us in servicing loans or accounts with us, to government entities in response to subpoenas, or to credit bureaus. Following are the types of information that we may share:

- Information we receive on a customer's application or other forms, such as name, address, social security number, assets, and income
- Information about transactions with us, our affiliates, or others, such as account balances, payment history, parties to transactions, and credit card usage
- Information we receive from a consumer-reporting agency, such as customers' creditworthiness and credit history.

If a customer decides to close account(s) with us or becomes an inactive customer, we will adhere to the privacy policies and practices described in this policy.

SAFEGUARDING CUSTOMER INFORMATION

We take appropriate steps to safeguard customer information. Please refer to our Information Security Program for further details. We restrict access to personal and account information, and confidential data to those employees with a legitimate business need for that data. When appropriate the Bank will strive to prevent inappropriate employee access to the data by utilizing physical controls, software controls, hardware controls, employee training, and employee screening. . Employees who violate these standards will be subject to disciplinary measures. We maintain physical, electronic and

procedural safeguards that comply with federal standards to guard nonpublic personal information and confidential information.

All financial and personal information about the Bank's customers and employees is considered confidential data. All information concerning the affairs of the Bank is also considered confidential data, this includes but is not limited to:

1. Name, address, phone numbers
2. Social security number, tax ID number, driver's license number, etc.
3. Deposit account numbers, balances, transactions, etc.
4. Loan information
5. Information regarding other services used
6. Salary and earnings information
7. Work record and disciplinary history
8. Management and committee discussions and minutes
9. Future plans, such as marketing, strategic, new products, new services, etc.
10. Pricing procedures for products and services
11. Vendors and relationships with those vendors

WEBSITE VISITORS

Visitors to the Reliabank Dakota public Web site remain anonymous. Reliabank does not collect identifying information about visitors to our site. Reliabank uses standard software to collect non-identifying information about our visitors such as date and time our site was accessed, pages viewed, and web browser used. Reliabank uses this information to determine the level of interest in information available on our site.

Visitors may elect to provide us with personal information via e-mail. This information is processed internally as appropriate, to handle the user's request. No information is transferred or sold to any other organization. We do not disclose any nonpublic personal information to anyone, except as authorized by law.

TRAINING

All bank employees will receive periodic training on the requirements of Regulation P and this policy to ensure staff are knowledgeable of the requirements relating to consumer privacy and the Bank's safeguards to protect customer and Bank information.

REVIEW OF POLICY

The board of directors shall review this policy every 18 months, making such revisions and amendments as it deems appropriate. Enacted by unanimous vote February 16, 2001, and last reviewed June 2023.