

WEBSITE POLICY

Bank of Cleveland is committed to providing the highest level of security and privacy regarding the collection and use of our Online Banking customers' personal information, as well as that of all visitors to our website.

We do not collect unique identifying information about you individually unless you voluntarily and knowingly provide us that information. You should never provide such information in an email or other transmission. The collection of personal information online is designed to protect access to your personal accounts and assist the bank in providing you with the products and services you want and need. All personal information collected and stored by the bank is used for specific business purposes-to protect and administer your personal accounts and transactions, and to comply with state and federal banking regulations.

On the website, click on "About" select "Contact Us" and complete the required form fields to submit information requests to the bank in a secure manner. While signed into Online Banking, use the "Conversations" section to send a secure message to us. The information you provide us will only be used as appropriate to handle your request. Your personal information will not be dispersed or sold to other organizations. By using our "Conversations" section while signed into Online Banking, the information is sent to Bank of Cleveland securely. Please keep in mind that emailing, texting, posting, etc. is not secure and others may be able to intercept those transmissions.

Web analytic software is used to collect non-identifying information about our visitors, as follows:

- Date and time our site was accessed
- IP address (numeric address given to servers connected to the Internet)
- Web browser used
- City, state and country

The general information that we collect is used to improve the content of our site and is not shared with other organizations for commercial purposes.

COOKIES

We may use internet cookies to help us authenticate your online session to Bank of Cleveland's Online Banking. A cookie is a unique identifying bit of data sent from our web server to your internet browser when you visit our site. The cookie is stored on your system but does nothing to your computer or hard drive and does not gather any personal information about you. Cookies help websites track user preferences and recognize return visitors.

SECURITY

Safeguarding our customer's information is our highest priority. Bank of Cleveland's website is encrypted. We use the latest encryption technology to secure your data along with firewalls, intrusion detection, virus protection, and application security. A phishing shield is used to maintain visitor trust, website & SSL integrity, defacement prevention and website server security. Your Online Banking account is secured by a unique user ID and password and multifactor authentication. You should never share these credentials and should notify us immediately if they have been compromised. Your online banking session will also sign off automatically from inactivity to protect your data. **For additional security, please remember to sign off after use and close your internet browser.**

LINKS TO OTHER SITES

We provide links to other web sites for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked web site. We assume no responsibility for the content, safety, security, or privacy of any such site or any transactions with respect thereto.

CHILDREN'S ONLINE PRIVACY PROTECTION ACT

The Children's Online Privacy Protection Act (COPPA), passed by Congress in October 1998, requires the Federal Trade Commission (FTC) to issue and enforce rules concerning children's online privacy. COPPA protects children under the age of 13 from the online collection of personal information. Protecting children on the internet and the privacy of children is very important to us. For this reason, we do not intentionally collect information at our web site from those we actually know are under 13, and no part of our web site is intended to attract anyone under 13.

For more information about the Children's Online Privacy Protection Act (COPPA) please refer to the FTC's web site at <http://www.ftc.gov/bcp/menus/consumer/data/child.shtm>.

Please refer to our current Privacy Policy or more information on how we manage the personal information of our current and former customers.

ADA COMPLIANCE

Bank of Cleveland is committed to ensuring the accessibility of its website and all other eBanking services for both customers and consumers with disabilities. eBanking services offered by the FI will conform to the requirements of Title II of the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and Department of Justice (DOJ) web accessibility directives in accordance with Web Content Accessibility Guidelines (WCAG 2.0), Level AA conformance, and the United States Access Board's Section 508 Standards.

ADA ACCESSIBILITY

With regards to Bank of Cleveland's website and any eBanking services that are developed, maintained, or offered through approved IT support vendors, Bank of Cleveland is committed to compliance with the standards of Title II of the ADA, Section 504, and DOJ web accessibility directives. Bank of Cleveland will ensure that customers or consumers with disabilities are able to obtain the same information and engage in and take advantage of the same services within the same timeframe as individuals without disabilities, with equivalent ease of use. Bank of Cleveland will further ensure that customers or consumers with disabilities are not excluded from using, denied the benefits of, or otherwise subject to discrimination with any of Bank of Cleveland's eBanking services. Existing content published by Bank of Cleveland, as well as new, updated, or existing content developed by a vendor, will conform to WCAG 2.0 Level AA guidelines or updated equivalents.

ADA ACCESSIBILITY CONCERNS, COMPLAINTS, AND GRIEVANCES

A customer or consumer who wishes to submit a complaint or grievance regarding a violation of Title II of the ADA, Section 504, or the DOJ web accessibility directives related to the accessibility of Bank of Cleveland's website or other eBanking service may submit a complaint directly to Bank of Cleveland. A verbal complaint may be made, but it should be documented by the end user receiving the complaint. Once information regarding a complaint has been received, it should be provided to the Bank of Cleveland's Compliance Officer.

Regardless of whether a formal complaint or grievance is made, if Bank of Cleveland becomes aware of inaccessible content, appropriate access will be offered as soon as possible to the party making the report. It is the standard of Bank of Cleveland that the party making the complaint should not have to wait for investigation of the complaint to be completed before receiving the information they were unable to access.

Complaints should be submitted in writing either through email or a formal letter. Complaints or grievances will be investigated by the Compliance Officer. The party making the complaint should be contacted by the Compliance Officer (or other designated individual) within five business days.