

**CUSTOMER SERVICE AND ONLINE PRIVACY**

<b>Section:</b> Internet Services	<b>Effective Date:</b> <Effective Date>	FIRST RELEASE
<b>Policy Number:</b> POLICY IS014	<b>Date Last Approved by Board:</b> <Approved Date>	<b>Prior Policy Number:</b> N/A
<b>Department:</b> Company Wide	<b>Initial Policy Date:</b> <Initial Policy Date>	<b>Prior Effective Date:</b> FIRST RELEASE

**POLICY STATEMENT**

The Board of Directors recognizes that within the IT services industry there is a real need to protect the privacy of customer information, particularly in the course of offering Internet services. <Company Name> makes every effort to mitigate the risk of privacy breaches. This is accomplished by assuring that customers are aware of how we may use their information, what their choices are about collection of such information, and clearly informing customers that there can be a free flow of information. <Company Name> Board of Directors and Senior Management have determined that a specific statement regarding information privacy shall be drafted and provided to each customer and staff member using Internet services offered by <Company Name>.

**AUTHORITY**

The Board of Directors, in establishing the online privacy policy, have delegated to the CTO, the authority to oversee the development of an online privacy policy as it related to <Company Name> Internet Services. In addition, the CTO/designee is responsible for enforcing the online privacy controls, reporting performance on implementation of online privacy initiatives, and annually reviewing the policy to determine whether it is compatible with changing technological and bank conditions.

**Department Managers** are responsible for enforcing the policy within their department and mitigating all operational risks associated with <Company Name>'s commitment to online customer information privacy principles.

**STATEMENT OF CUSTOMER PRIVACY AND ONLINE ACCESS**

To assist each <Company Name> customer (existing or potential) in understanding the rules governing electronic account access, a Privacy Policy Statement is provided on <Company Name>'s Web site. This statement addresses and documents <Company Name>'s online privacy principles, specific customer rights and options, and customer alternatives for accessing account information. In addition, this policy statement addresses the following concepts:

- Practices recommended and/or followed prior to <Company Name> collection of any customer information.
- Security and integrity of information collected, protection provided against unauthorized access to information, and controls established to prevent unauthorized disclosure or loss of information.
- Customer options regarding the collection and use of their personal information as well as the choice to restrict the use of such information.
- Customer access to information collected and options for identifying and correcting errors in a timely, inexpensive manner.
- Services offered by each Internet service or system and the fees, if any, related to the use of each service or system.
- Consumer options for reviewing records of <Company Name>'s compliance with its privacy policy and information practices, as well as a description of recourse in the event the consumer is injured.
- The degree to which online privacy practices parallel internal operational policies, procedures, and controls.
- <Company Name>'s expectation for online privacy controls.