



## **PRIVACY POLICY STATEMENT FOR INTERNET BANKING**

We, at Gulf Coast Bank & Trust Co., place a great deal of importance in the relationships we work so hard to build. We understand that privacy is important. We are committed to safeguarding your confidential information with the same care that we use to protect information obtained from transactions through any other vehicles of delivery.

As a general policy Gulf Coast Bank does not automatically collect customer information from those who visit our web site. Any information that may be collected is used to assist us in returning information from customer-initiated inquiries.

Our web site privacy policy is described below. It has been approved by our board of directors and is included in the training of our staff.

### **Recognition of Expectation of Privacy**

Gulf Coast Bank recognizes that our customers have a reasonable expectation of privacy, and we recognize the importance of protecting that privacy. We are committed to safeguarding both the financial records and relationships of both our customers and our visitors to our web site.

### **Collection, Use and Retention of Customer Information**

In order to identify and communicate with you through our web site Gulf Coast Bank may collect, use, and retain information about you. This information is collected and used to provide you with products and services that you initiate; to help us respond to specific questions that you ask; and to provide you with information that may be of interest to you. We may also use this information to help us comply with laws and regulations that apply to us. As a general rule we do not automatically collect and retain information from visitors to our web site.

We may collect and retain certain information of a general type such as:

- The name of the domain used to access the internet.
- The Link (Internet Address) used to gain access to our site.
- The type of web browser used to explore our site.
- The date and time.
- Visitors may also choose to give us information (i.e.: when applying for an account).

### **Maintenance of Accurate Information**

Gulf Coast Bank is committed to keeping our customers' account information accurate, current and complete. Procedures have been established to help assure that this information is correct in a manner that is commercially reasonable. Instructions for contacting the bank if a discrepancy is found are included on the account statements. We will research and resolve discrepancies as quickly as possible.

### **Employee Access to Information**

This privacy policy statement is provided to our employees during training. Employees are instructed never to divulge financial information or records of a customer to anyone outside the bank. Employee access to personally identifiable information is limited by their need to know to properly transact bank business. Employees are trained to recognize the importance of customer confidentiality and that the bank may take disciplinary measures to enforce those privacy responsibilities.

### **Protection of Information via Established Security Procedures**

Security standards and procedures to prevent unauthorized access to confidential information are in place. Updates to technology are implemented and tests conducted to improve the integrity of our systems in protecting information

### **Restrictions on the Disclosure of Account Information**

Specific information about customer accounts or reports or other personally identifiable data is not revealed to unaffiliated third parties for their independent use except for the exchange of information with reputable information reporting agencies to maximize the accuracy and security of such information or in the performance of bona fide due diligence, unless:

- the information is provided to help complete a customer initiated transaction,
- the customer authorizes it,
- disclosure is required by/or allowed by law (e.g., subpoena, investigation of fraudulent activity, etc.)
- the customer has been informed about the possibility of disclosure for marketing or similar purposes through a prior communication and is given the opportunity to decline ("opt out").

### **Maintaining Customer Privacy in Business Relations with Third Parties**

When it is necessary to contract with outside third parties to perform specific services or support bank products the vendors selected are expected to adhere to the same privacy standards and applicable laws and regulations as the Bank. They must be additionally responsible for maintaining customer confidentiality.

### **Disclosure of Privacy Principles to Customers**

This policy contains guidelines that have been prepared so that our customers and visitors to our web site understand our commitment to personal privacy.

Gulf Coast Bank & Trust Co. reserves the right to update or change this policy at any time.

### **Security Statement for INTERNET BANKING**

At Gulf Coast Bank & Trust Company, we understand the importance of the responsibility that you have entrusted to us. Gulf Coast Bank is proud of the sophisticated level of data security and privacy supplied to its Internet Banking accountholders. ITI and Unisys (nationally recognized vendors) have helped our data processing service bureau implement Internet security plans by selecting best-of-breed vendors for multiple functions.

Data security is provided on multiple levels: by company policy, firewall, intrusion detection software, network monitoring, and application-level security.

### **Company Policy**

Our data processing service bureau is prohibited from accumulating and distributing or selling our aggregated accountholders' information to third parties. In order to identify and communicate with you through our web site Gulf Coast Bank may collect, use, and retain information about you. This information is collected and used to provide you with products and services that you initiate; to help us respond to specific questions that you ask; and to provide you with information that may be of interest to you. We may also use this information to help us comply with laws and regulations that apply to us. As a general rule we do not automatically collect and retain information from visitors to our web site. We may collect and retain certain information of a general type such as: a) The name of the domain used to access the internet; b) The Link (Internet Address) used to gain access to our site; c) The type of web browser used to explore our site; d) The date and time of access; e) Other information visitors may also choose to give us (i.e.: when applying for an account).

### **Firewall**

A firewall serves as a security gate between the Internet and our data processing service bureau's network - including our mainframe data. By intercepting Internet data "packets" first, the firewall ensures that only packets permitted by our "rule set" may be passed beyond the public Internet to our secure web commerce server, and ultimately to the Internet Banking application. Our service bureau uses an integrated firewall system. This firewall system has been certified by the International Computer Security Association (ICSA).

### **Intrusion Detection**

Intrusion detection software, running on its own server, unobtrusively analyzes data packets to detect patterns of hostile activity, misuse, or malicious Java and ActiveX applets. The intrusion detection system detects intrusion attempts in real time and responds to suspicious activity.

### **Network Monitoring**

The firewall and intrusion detection system is monitored 7 days a week, 24 hours a day. The Internet banking application and its encrypted data are not available to monitoring personnel.

### **Application Level Security**

Unique user codes and passwords identify authorized accountholders. The combined effect of software security and network security allow customers to access only mainframe or other networked host areas permitted through the Internet Banking application.

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