

COMMUNITY BANK OF OKLAHOMA

PRIVACY POLICY & PROGRAM

At Community Bank of Oklahoma, our mission is to safeguard consumer/customer nonpublic, personal information.

The gathering, maintenance and sharing of information within our organization is paramount in providing the consumer/customer with effective and convenient banking products and services. Also, to serve the consumer/customer effectively and conveniently, we must utilize modern technology and consumer/customer information. However, we realize the concerns about privacy and our use of certain nonpublic, personal information. Accordingly, we pledge consumer/customer privacy.

Privacy Program & Customer Information Security Managers

Community Bank of Oklahoma's Privacy Manager, appointed by senior management, will have overall and ultimate responsibility for the proper creation and maintenance of the bank's privacy program. Additionally, the Bank's Network Management team will be responsible for ensuring that nonpublic, personal customer information is maintained in a appropriately risk-free environment, and that systems are established to prevent unauthorized access to, or manipulation of destruction of, such personal financial information. These directives will be achieved through appropriate support from the Banks Board of Directors and senior management.

Maintenance of Accurate Information

Community Bank of Oklahoma will strive to ensure our records are up to date and accurate in accordance with commercial standards, as well as various state and federal laws. We will also follow internal procedures for timely correction of inaccurate information after we become aware of the inaccuracy.

If a customer believes our records are incomplete, inaccurate or not current, they are instructed to call the telephone number on their account statement, or contact us by e-mail. Subsequently, pending a thorough investigation, we will correct the information in a timely manner.

Employee Access to Customer Information

All of the Community Bank of Oklahoma employees and officers are required to comply with the privacy policies adopted by this institution. Such policies provide that all employees and officers are obligated to keep our customer's nonpublic, personal information confidential and never discuss or disclose such information inside or outside of Community Bank of Oklahoma, unless required to transact proper bank business.

Through various policies and procedures, Community Bank of Oklahoma restricts access to nonpublic personal customer information to those employees and officers with a business reason to know such information, (i.e., Personnel Policy, and Privacy Policy). Furthermore, Community Bank of Oklahoma reserves the right to take appropriate disciplinary measures to enforce employee and officer confidentiality responsibilities.

Protection of Information and Account Data

Community Bank of Oklahoma customer records will be stored in a secure location at all times. We will maintain security standards and procedures to help prevent unauthorized access to such information. Additionally, we will continuously update and test our technology to improve the protection of our information, and to assure the integrity of our information.

Restrictions on Disclosure of Account Information

Community Bank of Oklahoma will not disclose our customer's nonpublic, personal information (i.e., deposit and credit card account numbers or access codes) to nonaffiliated 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 corporate due diligence, unless:

- The information is provided to help complete a customer initiated transaction;
- The customer requests it;
- The disclosure is required by law (e.g. subpoena, summons, or warrant, 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 (i.e., "opt out")

Unless specifically authorized by beneficiaries, our privacy policy prohibits disclosure to parties outside the Bank of the existence or administration of a trust, except to comply with a law, regulation or judicial proceeding or as deemed necessary in the administration of the trust.

Employee Privacy Education

At least annually, the Privacy Manager will conduct training in order to educate our employees and officers to recognize the importance of consumer/customer confidentiality.

Disclosure or Privacy Principles to Customers

Public disclosure of the features of Community Bank of Oklahoma privacy policy will ensure the Bank's customers have an opportunity to become aware of our policy, and to ask questions about it. Employees and officers will train so that they are able to respond to questions or to direct a customer to someone, such as the Privacy Manager, who can respond.

This policy specifically applies to individuals. Community Bank of Oklahoma reserves the right to make changes to this policy and our related procedures at any time. As we make changes to our policy, we will update accordingly.