

PRIVACY NOTICE



OXFORD BANK is committed to protecting your privacy.

At Oxford Bank, the basis of each customer relationship, many which span many generations, is trust. You have chosen to do business with Oxford Bank, and we are obligated to honor that relationship with us. We believe that your privacy should not be compromised. At the same time, we want to offer you the array of financial products and services you need to accomplish your financial goals. We believe that we can do both through the Privacy Policy outlined below. This Privacy Policy applies to non-public personal information about individuals who obtain financial products or services from us primarily for personal, family, or household purposes.

This notice is being provided to you on behalf of the companies in the **Oxford Bank Family**, including Oxford Bank Corporation and its subsidiaries, Oxford Bank, and Oxford Bank Financial Services, Inc. In this Notice, the companies in the Oxford Bank Family are referred to as "Oxford Bank," "we," "us" and "our."

OXFORD BANK uses a range of personal information.

We collect, retain, and use information about you only where we reasonably believe it will help administer our business or provide products, services and other opportunities to you. For example, this information enables us to:

- Serve and administer your accounts with accuracy.
- Provide you with high-quality, comprehensive services.
- Extend special offers and discounts based on your total relationship with us.
- Introduce you to other companies within the Oxford Bank Family that offer specialized products or services.
- Should you ever believe that our records contain inaccurate or incomplete information about you, please notify us. We will investigate your concerns and correct any inaccuracies in a timely manner.

OXFORD BANK collects information that may include:

- Information that we receive from you personally on applications, forms, or other correspondence, such as your name, address, phone number, assets and income.
- Information about your transactions with us, such as account balance, location of transactions, parties to transactions, and payment history.
- Information that we receive from others in order to establish your relationship with us, such as credit reports and income verification.

... and the disclosure of information.

We do not reveal specific information about your accounts or other personally identifiable data to parties outside the Oxford Bank Family for their independent use, unless:

- You request or authorize the release of information; or
- The information is provided to help complete a transaction initiated by you; or
- The information is provided to a reputable credit bureau or similar information-reporting agency; or
- The disclosure is otherwise lawfully permitted or required.

In addition, we may disclose all of the information we collect, as described above, to:

- Financial institutions with which we have joint marketing agreements, such as credit card companies; and
- Companies that perform marketing services for us or for others with which we have joint marketing agreements.

We require our joint marketing partners and marketing service providers to maintain the confidentiality of the information we provide them and to limit the use of the information to the purpose for which it was disclosed. We do not provide account or personal information to any non-Oxford Bank affiliated company for the purpose of independent telemarketing or direct mail marketing of any non-financial products or services of those companies.

Information We Can Share With The Oxford Bank Family About You – Unless You Tell Us Not To:

What Information: Unless you tell us not to, Oxford Bank may share Non-experience Information about you with companies in the Oxford Bank Family, which are financial service providers.

Non-experience Information includes:

- Information we obtain from your application, such as your income or business status;
- Information we obtain from a consumer report, such as your credit score or credit history;
- Information we obtain to verify representations by you, such as your open lines of credit;
- Information we obtain from a person regarding their employment, credit, or other relationship with you, such as your employment history.

We are permitted under law to share information about our experiences or transactions with you or your account, such as your account balance and your payment history with us ("Experience Information") with companies in the Oxford Bank Family.

OXFORD BANK protects your information ...

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles.

- We do not share medical or health information.
- We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.
- Data collected on the Oxford Bank website is protected with the same security as data collected from other correspondence.
- We insist-through written agreement that any third party who provides services to Oxford Bank and has access to nonpublic personal information must adhere to privacy principles similar to those which Oxford Bank adheres for keeping this information confidential.
- We comply with all laws to prevent identity theft, including confidentiality, unlawful disclosure and unauthorized access of information and documents that contain private information; we provide proper disposal of information and or documents that contain non-public information including Social Security numbers.
- Web links on the Oxford Bank website are provided for your convenience. We disclaim any responsibility for the collection, use or security of information collected when you leave our website. Please read the Privacy Policies of websites reached through the links from the Oxford Bank website.

OXFORD BANK protects information about former customers.

If you decide to close your account(s) or become an inactive customer, we will continue to adhere to the privacy policies and practices provided in this notice.

Right to "Opt-Out" and Other Inquiries:

Oxford Bank recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy and our use of customer information.

We do not share your non-public information with third parties without your permission.

You have the right to limit the sharing of information among companies within the Oxford Bank Family:

- You may direct us not to share your Non-Experience Information, described above, with companies in the Oxford Bank Family by calling, toll-free, 1-(800) 762-8988. And telling us you want to Opt-out of "Oxford Bank Family Sharing." If you do, we may continue to share experience information with companies in our Family.

You may opt-out on behalf of all account holders or individually. By choosing to "opt-out" you will limit your opportunity to receive product and service information and special offers that may be of interest you.

Customers who have questions about this Privacy Policy, or have a question about the privacy of their personal information, should call the Oxford Bank at (248) 628-2533, or e-mail us at privacy@oxfordbank.com.