

First Century Bank, N.A.

PRIVACY POLICY

At First Century Bank, N.A., we value the trust you have placed in us and we intend to continue to earn your trust each day. That's why we welcome the opportunity to describe our privacy policy and the steps we take to protect your personal information. You will also receive updates in the future from us, so you can continue to stay informed about this very important issue.

Our Privacy Pledge To You

- We are committed to protecting your privacy at all times.
- We do not share customer information with outside companies for purposes of selling their products and services to you.
- We do not share medical information provided as part of insurance applications or claims, except for the purposes you have authorized or as permitted by law.
- We are committed to bringing you the services you need to succeed financially. If we do not offer a financial service, such as an insurance product, we may establish a joint marketing program with an outside company to offer that service to you.
- These programs include confidentiality agreements to protect your personal information.
- We maintain security standards and procedures designed to protect customer information. We will continue to test and update our technology to improve the protection of our information about you.

We want you to know you can count on First Century Bank, N.A. to protect the privacy and security of your personal information, and to provide you with the responsive, professional service you deserve. First Century Bank, N.A. is a trusted symbol of service and reliability. We are committed to continue to provide quality and reliable service in the years to come, and to earn your trust and business every day.

How To Contact Us

First Century Bank, N.A.
807 Dorsey Street
Gainesville, GA 30503
(770)297-8060

Member FDIC
Equal Housing Lender

Our Policies Regarding The Collection, Use and Disclosure of Customer Information

Information Collection

At First Century Bank, N.A., our goal is to provide you with all the services you will need to succeed financially. We are committed to providing you with responsive, personalized service, and keeping you informed about new services that may be of immediate interest to you, or new benefits that can help you derive the greatest value from your relationship with First Century Bank, N.A.

The primary reason we collect and maintain customer information is to provide assistance to you for your financial needs. This information is collected from a variety of sources, such as the following:

- Information you provide to us on applications or forms, like your income and accounts.
- Information we receive from an outside company, such as a credit bureau, providing your credit history or employment information.

Information Use and Disclosure With Outside Companies or Parties

We may disclose customer information to the following types of outside companies or parties only for specific purposes as permitted by law

- Financial service providers such as insurance companies under a program with us, and which typically offer services that are different than those we provide to you.
- Non-financial companies, including companies that perform services on our behalf, such as check printers, or companies that help us market our products and services to you.
- Independent contractors, such as technical system consultants who program our software to help us administer our products or market our products to you.

Information Disclosed to Outside Non-financial Companies and Independent Contractors

When outside parties perform services on our behalf, in some instances we may disclose some or all of the information that we collect, as described in the Information Collection section. This information may be provided to certain non-financial companies and independent contractors for the purposes of servicing your account or to perform marketing or similar services on our behalf with respect to products or services we provide. These companies and contractors are subject to confidentiality provisions and restrictions that prohibit using the information beyond the performance of the specified services on our behalf.

Information Disclosed to Outside Parties in Other Situations

We also disclose certain customer information to government agencies, consumer reporting agencies, and other outside parties as permitted or required by the Federal Privacy Act and other applicable laws. These disclosures are made for specific, limited purposes, such as to verify individuals' identities (reducing fraud and identity theft), to meet customer service expectation (connecting to national ATM networks for ATM card access), to verify information for prompt credit approvals (meeting customers' immediate financial needs), or to make certain information a matter of public record (recording mortgages to inform prospective buyers, title insurers, and let others know about property liens).

Our Policies Regarding the Collection, Use and Disclosure of Information about Former Customers

Our policies and practices regarding the collection and disclosure of information about former customers are the same as those regarding the collection and disclosure about existing customers (see the section titled Our Policies Regarding the Collection, Use and Disclosure of Customer Information). Our information about former customers is used less and less over time after the relationship ends and is eventually removed from our records.

Information Confidentiality and Security Information Confidentiality and Protection Practices

As described in our Pledge to you, First Century Bank, N.A. is committed to preventing others from unauthorized access to your customer information, and we maintain procedures and technology designed for this purpose. We take several steps to protect the customer information we have about you, including the following:

- We update and test our technology on a regular basis in order to improve the protection of customer information.
- We require outside companies and independent contractors to whom we provide customer information for marketing, servicing or processing purposes to enter into a confidentiality agreement that restricts the use of the information to those purposes and prohibits independent use of the information.
- We have internal procedures that limit access to customer information, such as procedures that require an employee to have a business need to access customer information. We maintain policies about the proper physical security of workplaces and records. Our physical, electronic, and procedural safeguards comply with federal regulations regarding the protection of customer information.

Information Integrity Measures

First Century Bank, N.A. works hard to ensure the information we maintain on each customer is complete and accurate. We have procedures and processes for updating our customer information as well as removing old information.

We protect the integrity of customer information through measures such as maintaining backup copies of account data in the event of power outages or other business interruptions, using computer virus detection and eradication software on systems containing customer data, installing computer hardware and software, and employing other technical means (known as "firewalls") to protect against unauthorized computer entry into systems containing customer information.

Tips to Help You Protect Your Personal Information

Assistance to Victims of Identity Theft

If you suspect that someone has had unauthorized access to your account, or access to your personal identifying information such as your Social Security number or credit card information, please notify an First Century Bank, N.A. service representative immediately so we can take action to protect you. In addition, you should also report the crime to your local law enforcement agency and to the Federal Trade Commission (FTC). To speak with a trained FTC telephone counselor, call toll-free at 1-877-IDTHEFT (1-877-438-4338). Or to enter information about your complaint into a secure FTC online database, sign onto <http://www.consumer.gov/idtheft>. The site also provides links to numerous consumer education materials.

Ways to Limit Direct Marketing You May Receive From Outside Sources

At First Century Bank, N.A., we do not share your account information with outside sources. However, there are outside agencies and companies, including national consumer credit reporting agencies, which are in the business of compiling mailing lists for purchase by marketers. You may wish to have your name removed from many of these lists by following the procedures outlined below:

Direct Marketing Association and Member Companies

To remove your name from direct mail or telemarketing lists of members of the Direct Marketing Association, send a written request with your name, address, and Social Security number (if it was included in the mailing you received) to the Direct Marketing Association. The Direct Marketing Association is responsible for notifying its members (i.e. the agencies and companies that compile mailing lists) that you want your name removed from the lists they sell. Your name and address remains in their consumer exclusion files for five years. You must register your own name and address with these organizations because they cannot process any request from us. Be sure to include any variations of your name, address and other information that have appeared in mailings or telephone calls that you have received.

Mail Preference Service Assoc. c/o Direct Marketing Association
P.O. Box 9008
Farmingdale, NY 11735-9008

Telephone Preference Service c/o Direct Marketing Association
P.O. Box 9014
Farmingdale, NY 11735-9014

National Consumer Credit Reporting Agencies (Credit Bureaus)

In addition to sharing information with member companies for credit verification and fraud control purposes, national consumer credit reporting agencies may also sell or share your name and certain other information to various outside companies for marketing purposes. You may direct these agencies not to sell or share this information about you for marketing purposes - but your financial institution may not make that request on your behalf. If you wish to direct these agencies not to sell or share this information about you for these marketing purposes, please contact the agencies directly to communicate your request.

