

## OAKWORTH CAPITAL BANK PRIVACY POLICY

Oakworth recognizes the sensitive nature of your information and takes appropriate precautions to protect your privacy. You can be certain that:

- We do not sell any client information to other companies.
- We safeguard your information carefully and handle it responsibly.
- We are committed to helping you protect your privacy every day.

This privacy policy provides more details about how we collect, use and protect client information. We believe that protecting your privacy is an integral part of the client service we provide to you, and we work diligently every day to honor the trust you place in us.

Thank you for banking with us.

### Information We Collect

The information we collect is limited to what we believe is necessary or useful to conduct our business, identify you as our client, establish and manage your accounts, complete your transactions, understand your needs, market products and services that we believe meet your needs, and comply with legal and regulatory requirements.

We collect this information from a variety of sources, including the following:

- Information we receive from you on applications or other forms, such as your assets, income and debt.
- Information about your transactions and experiences with us, our affiliates or others, such as your account balance, payment history, parties to transactions and credit card usage.
- Information we receive from a consumer report, such as information regarding your creditworthiness or credit history.
- Information we receive from public records and market research, such as statistical and demographic information.
- Information we obtain from outside sources relating to their employment, credit or other relationships with you, such as a verification of employment history, loan or credit card balance or insurance coverage.

### Information We Share

#### *Sharing Information Within Oakworth*

Oakworth from time to time may have affiliates within our corporate organization. To help us achieve the purposes for which information is collected, we may share transaction and experience information (for example, information about your loan amounts and deposits with us) and contact information (such as your name and address) among the companies that make up Oakworth.

We will not share credit information received from you or others (such as information from your credit application or your employment or credit history) to evaluate your eligibility for various financial services (for example, a home equity loan at a special rate) without first telling you and providing you with an opportunity to tell us your preference.

#### *Sharing With Companies That Work With Us*

In order to conduct our business, and to offer products or services that may complement your relationship with us, we may share some or all of the information we collect, as described above, with the following companies:

- Companies that perform services for us or on our behalf, such as vendors we hire to print checks for our clients, to prepare and mail account statements, to appraise property offered as collateral, to verify property ownership, to process client transactions and to provide support for one or more of our products and services.
- Companies that perform marketing services on our behalf or other financial institutions with which we have joint marketing agreements, such as credit card issuers.

Before we disclose client information to any of these companies, we require them to agree to keep it confidential and secure and to use it only as authorized by us.

#### *Sharing With Companies That Issue Oakworth Credit Cards*

We partner with an external company that issues and administers our credit card program. In order to offer credit cards to our clients, it is important that we exchange certain client information with the card issuer. This may include:

- Information we receive from you on applications or other forms, such as your name, address, Social Security number, assets or income.
- Information about your accounts with us.
- Information from credit bureaus regarding your previous credit performance.

The card issuer has agreed to strictly safeguard the confidentiality of this information and is not permitted to share it with anyone else without our permission. You may request that we not share your information with the card issuer. In such cases, you cannot be offered an Oakworth credit card.

If you elect to obtain an Oakworth credit card, please familiarize yourself with the card issuer's privacy policy as it may differ from our policy.

#### *Sharing In Other Situations*

We may share client information with third parties in other situations when you request or give us permission to do so or when we are permitted or required to do so by law. Some examples include

when we complete your transactions, such as paying your checks, following your online payment directions, or purchasing or selling securities for your account; when we respond to your service requests; when we share information with consumer reporting agencies; when we verify your account status for merchants you want to pay by check; when we offer account benefits, such as credit card and other reward programs; when we transfer information in connection with a proposed or actual sale of accounts; when we suspect fraud or for risk management purposes; when we are required by a federal, state, or local law or regulation to do so; and when we receive a subpoena or are ordered by a court to do so.

### Keeping Your Information Secure

Keeping financial information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect client information. Appropriate employees are authorized to access client information for business purposes only. Our employees are bound by a code of ethics that requires confidential treatment of client information and are subject to disciplinary action if they fail to follow this code.

### Former Clients

Our policies for sharing client information, both within and outside of Oakworth, also apply to all of the information we have gathered about our former clients.

### Maintaining Accurate Client Information

We strive to maintain complete and accurate information about you and your accounts. If you ever believe that our records contain inaccurate or incomplete information about you, please call or write to us at the telephone number or address listed on your account statement, bank records or other documentation, or visit our Web site at [www.oakworthcapital.com](http://www.oakworthcapital.com) to send us a secure e-mail. We are committed to resolving any inaccuracies as quickly as possible.

### Keeping Up To Date With Our Privacy Policy

We may make changes to this policy at any time and will inform you of changes, as required by law. To receive the most up-to-date privacy policy, you can visit our website at [www.oakworthcapital.com](http://www.oakworthcapital.com) or call us at 205-263-4700.

### Online Information Policies

We respect your privacy and are committed to protecting your information on our website. To view our current online privacy notice, visit us at [www.oakworthcapital.com](http://www.oakworthcapital.com).

### How We Use E-Mail

We will never send e-mails asking for personal or account information, such as passwords, Social Security numbers, PINs, credit or Check Card numbers. In most instances, we will not send you emails unless you have initiated an e-mail dialogue with us; you have previously requested us to communicate with you in this manner; and/or the e-mail is about your relationship with us.

Fraudulent emails and Web sites can appear to be from legitimate companies and include their images and logos. They often have a sense of urgency about them and state that if you fail to update or confirm certain information, access to your accounts will be suspended. These e-mails are not authorized by us and are fraudulent. To report a fraudulent e-mail or Web site, please call or e-mail us.

### How to Protect Yourself

We recommend that you follow these security measures to protect and help prevent potential misuse of personal information about you:

- Protect and properly dispose of your account records.
- Do not share account information, passwords, user IDs, PINs, code words or other confidential information with others.
- Do not provide confidential information by telephone to unknown callers.
- Do not provide confidential information online unless you initiated the contact, know the party with whom you are dealing, and provide the information through a secure channel.
- When conducting business over the Internet, always use a secure browser, exit online applications as soon as you finish using them, and make sure you have virus protection and a firewall and update them regularly.
- Monitor your credit report for accuracy. By law, you are entitled to receive one free credit file disclosure every 12 months from each of the nationwide consumer credit reporting companies.

### Miscellaneous Information

Our privacy policy applies to individuals who obtain or have obtained from us a financial product or service that is used primarily for personal, family or household purposes. This privacy policy is provided in compliance with applicable federal law. If, in addition to federal law, you are protected by specific state laws concerning information sharing, we will fully comply with those laws as well.

### Oakworth Companies

This policy applies to Oakworth Capital Bank and to all affiliates within our corporate organization from time to time established. For a current list of Oakworth companies to which this policy applies, please visit us at [www.oakworthcapital.com](http://www.oakworthcapital.com).

### Where To Find Out More

If you have questions, concerns, or comments about our privacy practices or the way your information is maintained and used, we'd like to hear from you. Please call us at 205-263-4700 during regular business hours, or visit us at [www.oakworthcapital.com](http://www.oakworthcapital.com) to send us a secure e-mail.