

PRIVACY & SECURITY

NOTICE OF YOUR FINANCIAL PRIVACY RIGHTS

Superior National Bank & Trust Company

Subsidiary of
Keweenaw Financial Corporation

Member FDIC
Equal Housing Lender

Our Privacy Commitment to You - Serving the local community since 1890, Superior National Bank has always valued its customers' privacy. When you do business with our financial organization, you're asked to provide us with personal information. This information is important because it helps us get a better picture of your needs, provide better service, and complete your transactions more efficiently. We have protected your confidential information in many ways and will continue to do so. We have developed privacy policies by which we operate. These policies outline how we use and safeguard the information you give us.

We appreciate your business. Thank you for banking with Superior National Bank, the largest locally owned and operated bank in the Upper Peninsula of Michigan, where the money deposited here, stays here.

"We", "our", and "us", when used in this notice, means Superior National Bank & Trust Company. This is our privacy notice for our customers. When we use the words "you" and "your" we are referring to our consumer customers who have a continuing relationship by purchasing or holding financial products or services such as: deposit accounts, loan accounts, safe deposit boxes, debit cards, installment sale contracts which we hold or service, self-directed IRA accounts, and financial or investment services.

The following privacy principals were established to maintain the security, integrity, and confidentiality of your personal financial information.

Important Information About Our Procedures - To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. This means when you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Confidentiality and Security of Nonpublic Personal 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 required to honor our code of conduct, which includes standards to protect customer confidentiality. They are subject to disciplinary action if they fail to do so. We maintain policies and procedures covering the proper physical security of workplaces and records. Our physical, electronic and procedural safeguards comply with federal standards to guard your nonpublic personal information. We require independent contractors and outside companies who work with us to adhere to strict privacy standards regarding the protection of customer information. We use technological means, such as backup files, virus detection, firewalls, and other computer software and hardware to protect against unauthorized access or alterations to customer data.

Nonpublic Personal Information We Collect - Nonpublic personal information is information about you that we obtain in connection with providing a financial product or service. We do not disclose any nonpublic personal information about you to anyone, except as permitted by law. We collect nonpublic personal information about you from a variety of sources, such as:

- Information we receive from you on applications such as your income and accounts with others
- Information about your transactions with us
- Information we receive from a consumer reporting agency regarding your credit history or employment status
- Information we receive as a result of verifying customer information

Information Used to Serve Your Accounts - Customer information we collect is used to serve your accounts and meet your financial needs. Information may be used in the following ways:

- To protect your account from unauthorized access or identity theft
- To process your requests such as loan applications, purchases, and ATM withdrawals
- To service your accounts by issuing checks, ATM cards, and account statements
- To keep you informed about financial services of interest to you

Nonpublic Personal Information We Disclose - We do not disclose any nonpublic personal information about you, our customers or former customers, to anyone except to other nonaffiliated third parties as permitted by law. Examples of this might include disclosures necessary to service your account or prevent unauthorized transactions. This may include financial service providers such as companies that perform support services for us as data processors, technical systems consultants and programmers, check printers, and insurance agents.

We may also disclose nonpublic personal information about you when working with a secondary market mortgage company on your behalf. We may disclose information such as name, address, and age to insurance companies with which we have a joint marketing agreement. Other situations when we may disclose to third parties the customer information we collect as permitted or required by law could include government entities, courts or other entities in response to subpoenas and other legal processes.

You do not have a right to opt out of the disclosure of nonpublic personal information about you to these categories of third parties.

Notice About Credit Reporting - We may report information about your accounts to credit bureaus and/or consumer reporting agencies. Late payments, missed payments, or other defaults on your accounts may be reflected in your credit report and/or consumer report.

Trust Department Accounts - Trust accounts for which Superior National Bank is the trustee are protected under special rules of confidentiality, and trust account information is not shared for marketing purposes without specific consent.

Information About Former Customers - We do not disclose nonpublic personal information about former customers except as permitted by law.