

# STATEMENT OF PRIVACY PRACTICES

## OUR COMMITMENT TO YOUR PRIVACY

Trust is the cornerstone of our relationships that we maintain with our customers. It is also the essence of our commitment to you - - to protect, at all times, the privacy and security of the information you choose to provide to us.

For this reason, we want to share with you our Statement of Privacy Practices. This Statement is made on behalf of Glens Falls National Bank & Trust Company.

This Statement of Privacy Practices describes our use of nonpublic personal information on consumers: individuals who obtain financial products or services from us for personal, family or household purposes. "Nonpublic personal information" generally means financial information identified with you that is not obtainable from a public source. For example, your account balance is nonpublic personal information. In contrast, the fact that you have a mortgage with us is public information because your mortgage is available as a matter of public record.

Within this Statement of Privacy Practices, we describe how we collect and use your nonpublic personal information, how we share this information and with whom, how we maintain the confidentiality and accuracy of such information, and how you may verify the accuracy of information pertaining to your accounts with us. This Statement also applies to *former customers*.

## INFORMATION WE COLLECT

In the course of doing business, we collect nonpublic personal information about you primarily from the following sources:

- 1) Information we receive from you on applications and other forms, such as your name, address, Social Security number, annual income, assets, current and past employers, etc.;
- 2) Information about your transactions and experiences with us and our affiliate(s), such as your loan and deposit balances; transaction histories and other similar information with us, our affiliate(s) and others; and
- 3) Information we receive from a consumer reporting agency.

## CATEGORIES OF INFORMATION WE SHARE

### **With Our Affiliates.**

Within our corporate family of companies, we are permitted to, and may share account history and experience information such as your loan repayment history, account balance(s), and types of accounts you maintain with us, etc. The Fair Credit Reporting Act governs the sharing of information in these situations and the provisions of that law will guide us. For the types of information sharing permitted of this nature, our affiliates presently include: our parent holding company; affiliate bank(s); real estate investment trust; leasing company; title insurance company; financial services company; investment adviser; and community development corporation affiliated with one of our banks.

In addition to the above, we currently do not share other credit- or other personal-related information derived from consumer reports and loan or other applications unless we are jointly, or through an agency relationship, providing or offering you a financial product or service, or as otherwise permitted by law.

### **With Unaffiliated Third Parties.**

- 1) Third Party Servicers.  
We may disclose your nonpublic personal information as described above in the section "INFORMATION WE COLLECT" to third party service providers, including, for example, those who develop and maintain certain transaction processing systems, mail your account statements, authorize transactions, and provide other materials or services that you have specifically requested. These third party servicers are required to safeguard our information about you and your products and services with us and must abide by applicable law.
- 2) Joint Marketing or Private Label Credit Programs.  
Also on a confidential basis, we may share your nonpublic personal information that we collect as described above in the section "INFORMATION WE COLLECT", *with the exception of number 3) above*, "Information we receive from a consumer reporting agency", with another bank or financial institution with which we maintain a joint marketing relationship, such as a private label credit card program and to companies that perform marketing services on our behalf.

- 3) Direct Marketing by Third Parties.  
**We do not share your nonpublic personal information with third party marketers offering their products and services.**  
If our practice were to change, we would, of course, offer you the ability to “opt out” of this type of information sharing, and we would offer you the “opt out” with time to respond before the change in our practice takes place.
- 4) Other Disclosures of Nonpublic Personal Information as Required By or Permitted By Law.  
We will disclose nonpublic personal information to other parties: with your consent; to complete a transaction that you initiated; as required by law such as to comply with a subpoena, court order, or administrative directive; to protect against or prevent fraud or unauthorized transactions; to consumer reporting agencies; as well as to our regulators, attorneys, auditors and accountants in the normal course of business and as otherwise permitted by law.
- 5) Business Transfers.  
We may also make a decision to sell a current line of business (for example, rights to the servicing of your mortgage with our Bank). We reserve the right, in circumstances such as these, to transfer the information necessary to the purchaser.
- 6) Other.
- Under certain circumstances, medical information will only be disclosed when it is required in connection with an application for a specific insurance product as permitted by law.
  - Trust and fiduciary information is subject to special protections – even within our affiliates. This information is considered extremely confidential.

### **ACCURACY OF CUSTOMER INFORMATION**

We continually strive to maintain complete and accurate information about you and your accounts. We also have procedures in place to ensure that requests to correct inaccurate or incomplete information are handled professionally and in a timely manner.

If you ever find that your information with us is incomplete, inaccurate or not current, please contact us by referring to the address or phone number listed on your account statement, or by using the address or toll-free number listed below. We will act promptly to correct any erroneous information.

Write to: Glens Falls National Bank & Trust Company  
250 Glen Street, Glens Falls, NY 12801  
Call: 518-793-4121 or 1-866-248-6366.

Please provide us with your account number(s) as well as all other information you believe we should know about the situation. For bank customer requests involving information provided to a credit bureau, we will investigate the matter and respond to you within 30 days.

### **CONFIDENTIALITY AND SECURITY**

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. We maintain physical, electronic and procedural safeguards that comply with Federal laws and regulations to guard your nonpublic personal information.

### **OTHER INFORMATION AND DISCLAIMERS**

You should be aware that third parties with which we may have business relationships may coincidentally have access to customer information that is obtained independently from other sources. Mailings and solicitations based on these other sources are not within our control.

If you have questions concerning our Statement of Privacy Practices or your other privacy rights, please stop by any of our offices or call us at the phone numbers listed above.

**WE RESERVE THE RIGHT TO MAKE CHANGES TO THIS STATEMENT OF PRIVACY PRACTICES. WE WILL PROVIDE YOU WITH NOTICE OF ANY CHANGES AS REQUIRED BY LAW.**

### **Glens Falls National Bank and Trust Company**

Equal Housing Lender/Member FDIC  
January 2010