

BANK PRIVACY DISCLOSURE

FACTS	WHAT DOES GREENFIELD COOPERATIVE BANK/NORTHAMPTON COOPERATIVE BANK, A DIVISION OF GREENFIELD COOPERATIVE BANK DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal Law gives consumers the right to limit some but not all sharing. Federal Law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect, and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security Number and income • Account balances and transaction or loss history • Credit history and payment history <p><u>Applicability to Former Customers:</u> If your customer relationship with us is ended for any reason, please be assured that we will treat the information we have about you as if you were still our customer.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons the Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does the Bank share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes, we may share the information we collect about you with certain non-affiliated third-party companies. These non-affiliates are not owned or controlled by us but are companies we may contract with to provide you with convenient access to other products and services or because these companies help us perform necessary business functions or services. We may also disclose nonpublic personal information about you to non-affiliated third parties as permitted by law.	No
For our marketing purposes – to offer our products and services to you	Yes, non-financial companies that we may have joint marketing arrangements with, such as the marketing firms used by us for customer surveys and direct mailings.	No
For joint marketing with other financial companies	Yes, as permitted by law for any joint marketing arrangement the Bank has with a non-affiliated third party to make available certain products and services to our customers.	No
For our affiliates' everyday business purposes – information about your transactions and experiences	No, the Bank is a subsidiary and is the only subsidiary of Greenfield Bancorp, MHC.	No
For our affiliates' everyday business purposes – information about your creditworthiness	No, the Bank does not share information with Greenfield Bancorp, MHC about your creditworthiness.	No
For our affiliates to market to you	No, the Bank does not share personal information for marketing purposes with Greenfield Bancorp, MHC	We don't Share
For non-affiliates to market to you	No, the Bank only shares personal information for marketing purposes as permitted by law for joint marketing arrangements	No

Questions?	Call (877) 682-0334 or go to www.GreenfieldCoopBank.com
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What we do	
How does the Bank protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with Federal Law. These measures include computer safeguards and secured files and buildings and training/testing of our staff. We also audit our security and confidentiality procedures to make sure they work.
How does the Bank collect my information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> • Open an account or make deposits or withdrawals from your account • Apply for a loan or give us your income information • Show your driver's license
Why can't I limit all sharing?	Federal Law gives you the right to limit only <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes – information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you State law and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. For example, Greenfield Cooperative Bank (including its Northampton Cooperative Bank division) is a subsidiary of Greenfield Bancorp, MHC.
Non-affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. Non-affiliates we share with can include <ul style="list-style-type: none"> • <u>Financial Service Providers</u> – that we may have joint marketing arrangements with to provide you access to financial services such as our credit cards or investment brokerage. • <u>Non-financial companies</u> - that we may have joint marketing arrangements with, such as the marketing firms used by us for customer surveys and direct mailings, and vendor we use for printing of checks for customers. • <u>Data processing companies</u> - vendors we contract with to carry out transactions initiated by you (such as a debit or ATM card transaction) or to carry out our day-to-day business and record keeping. • We may also disclose nonpublic personal information about you to non-affiliated third parties as permitted by law. • If you request in writing that we provide it to another party. Please be assured that whenever we use any third-party company or vendor to provide services on your behalf, we contractually bind them to strict confidentiality with respect to any information that we may have provided, including information about our customers.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products and services to you. The Bank may, as permitted by law, enter into a joint marketing arrangement with a non-affiliated third party to make available certain products and services to you.

Card Connect Users (Online Banking Debit Card Control Service)	
THE TYPES OF INFORMATION WE COLLECT IN THE SERVICE	<ul style="list-style-type: none"> • Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area. • Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, we will collect location data when you use the Services even when the app is closed or not in use; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

YOUR CHOICES REGARDING YOUR INFORMATION	<p>Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the App.</p>
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Other important information
<ul style="list-style-type: none"> • Safekeeping of your personal information is a priority with us. • We adhere to state law “201 CMR 17.00: Standards For The Protection Of Personal Information Of Residents Of The Commonwealth” that mandates personal information be encrypted when stored on portable devices or transmitted wirelessly or on public networks. Additionally, the regulations call on businesses to utilize up-to-date firewall protection that creates an electronic gatekeeper between the data and the outside world and only permits authorized users to access or transmit data, according to preset rules. • <u>Is the Bank’s information on me accurate?</u> The Bank makes every effort to maintain the most up-to-date, complete and accurate customer and account information. If you believe any information retained by the Bank is inaccurate, please call us at (877) 682-0334 and ask for Customer Service. We will investigate the problem, and if it is determined that the information is incorrect, we will take appropriate action quickly and according to industry practices and applicable law.

Greenfield Cooperative Bank | Northampton Cooperative Bank a Division of Greenfield Cooperative Bank

