

ONLINE PRIVACY POLICY

Certain personal information about visitors to this Web site is being collected by The Croghan Colonial Bank, Fremont, Ohio 43420. Personal information is collected from you at the time an application for a loan or deposit account is submitted to this Institution, at the time transactions are conducted through the online banking service, and at the time information is provided by you via e-mail (including the name, e-mail address, and any other information on the e-mail header).

Information is collected for the purpose of processing your application, transaction, or request for information. The information will be used for the purposes of meeting your banking needs and requests, and providing services to you in the future. This Institution does not sell or share customer information with any nonaffiliated third parties, except certain third party service providers. These entities will be required to execute a confidentiality agreement with the Institution which requires adherence to the Institution's privacy policy and practices. This Institution does not share information with companies which are affiliated with this Institution by common control. We share information as permitted by law in order to provide you with better services and more options.

If you do not want your personal information collected, you may refrain from supplying the information, whether through e-mail or this Institution's online banking service.

You also may restrict the use of or limit the disclosure of your personal information by notifying this Institution that you do not want your personal information shared with entities affiliated with this Institution. This written notice should be directed to the Compliance Officer, The Croghan Colonial Bank, 323 Croghan Street, Fremont, Ohio, 43420, by sending a telefacsimile to the Compliance Officer at (419) 355-2266 or by calling us toll-free at (888) 276-4426. You may also send us notice by e-mail by selecting one of the following options via our "Contact Us" button on our website at www.croghan.com: General Inquiry or Secured E-Mail. The Secured E-Mail option should be used if your correspondence contains sensitive information (e.g., your account number or social security number).

We are taking the following steps to ensure the privacy and accuracy of the information collected from or about you: Ensuring your financial privacy is of vital importance to this Institution and its employees. This Institution limits employee access to confidential customer financial information to those with a business reason for knowing such information. Institution employees are trained to understand the importance of customer financial privacy and to properly handle confidential information. The Institution endeavors to maintain the most accurate and up-to-date customer records possible. If you find that your account information is not correct, current, or complete, please call or write to us at the telephone number or address on your account statement and appropriate corrections will be made as soon as possible.

Additionally, information you submit via our online banking service is protected by encryption technology which scrambles account information to reduce the possibility of access by unauthorized individuals outside this Institution. To further protect your online banking service, this Institution requires the use of an ID and password and multi-factor authentication.

You may review the information we collect about you and correct any errors in that information by reviewing account statements and any other correspondence from us and notifying us of any inaccurate or outdated information at the address or phone number on your statements.

If you have questions about your personal information or would like to inform us about the potential misuse of your personal information, you may do so by sending a letter to the Compliance Officer, The Croghan Colonial Bank, 323 Croghan Street, Fremont, Ohio, 43420, by sending a telefacsimile to the Compliance Officer at (419) 355-2266 or by calling us toll-free at (888) 276-4426.. You may also send us notice by e-mail by selecting one of the following options via our "Contact Us" button on our website at www.croghan.com: General Inquiry or Secured E-Mail. The Secured E-Mail option should be used if your correspondence contains sensitive information (e.g., your account number or social security number).

If you feel we have not met our obligations in the protection or use of your personal information, you may submit a complaint to this Institution. Any complaint will be handled in compliance with this Institution's Consumer Complaints Policy. Breaches of customer privacy are considered serious employee misconduct and may result in termination of the employee.

We recognize the importance of protecting children's identities and privacy online. Our website is not directed at children, and we do not knowingly collect or maintain personal information from children.

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| Why? | <p>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.</p> |
| What? | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and transaction history ▪ Account balances and payment history ▪ Credit history and credit scores <p>When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p> |
| How? | <p>All financial companies need to share client's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client's personal information; the reasons Croghan Colonial Bank chooses to share; and whether you can limit this sharing.</p> |

| Reasons we can share your personal information | Does Croghan Colonial 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 | No |
| For our marketing purposes – to offer our products and services to you | Yes | No |
| For joint marketing with other financial companies | Yes | No |
| For our affiliates' everyday business purposes – information about your transactions and experiences | No | We do not share |
| For our affiliates' everyday business purposes – information about your creditworthiness | No | We do not share |
| For nonaffiliates to market to you | No | We do not share |

QUESTIONS? Call: 888-276-4426 or go to www.croghan.com



Who we are

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|-------------------------------|-----------------------|
| Who is providing this notice? | Croghan Colonial Bank |
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What we do

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| How does Croghan Colonial 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. |
| How does Croghan Colonial Bank collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Open an account with us or complete an application for credit ▪ Make deposits or withdrawals from your account ▪ Use your credit or debit card or show your driver’s license <p>We also collect your personal information from others, such as credit reporting agencies.</p> |
| Why can’t I limit all sharing? | <p>Federal law gives you the right to limit only</p> <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 nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |

Definitions

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| Affiliates | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Croghan Colonial Bank does not share with our affiliates.</i> |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Croghan Colonial Bank does not share with nonaffiliates so they can market to you.</i> |
| Joint marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>Our joint marketing partners include credit card issuers.</i> |

Other important 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.

If you decide to close your account(s) or become an inactive client, we will follow the privacy policies and practices as described in this notice.