

<b>FACTS</b>	<b>WHAT DOES WINDWARD BANK DO WITH YOUR PERSONAL INFORMATION?</b>
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<b>Why?</b>	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.
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<b>What?</b>	<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"> <li>Social Security Number and Payment History</li> <li>Account Balances and Account Transactions</li> <li>Overdraft History and Transaction History</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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<b>How?</b>	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 Windward Bank chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does Windward Bank share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We do not share
<b>For our affiliates to market to you</b>	No	We do not share
<b>For nonaffiliates to market to you</b>	No	We do not share

<b>Questions?</b>	Phone: 800-865-7653   Website: <a href="http://www.windwardbank.com">www.windwardbank.com</a>
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Who we are	
Who is providing this notice?	Windward Bank, a Division of Martha's Vineyard Bank, and all its affiliates. (Collectively Martha's Vineyard Bank).
What we do	
How does Windward Bank protect my personal information?	<p>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.</p> <p>We restrict access to your nonpublic personal information to only those employees who need to know that information in order to provide products or services to you.</p>
How does Windward Bank collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• Open an account or Deposit Money</li> <li>• Apply for a loan or Pay your bills and/or</li> <li>• Make deposits or withdrawals from your account</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</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"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you and/or</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. <i>See below for more on your rights under state law.</i></p>
Definitions	
Affiliates	<p>Our affiliates include companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include the following:</p> <ul style="list-style-type: none"> <li>• <i>Martha's Vineyard Investment Advisors,</i></li> <li>• <i>Martha's Vineyard Sound Insurance LLC,</i></li> <li>• <i>Martha's Vineyard Charitable Foundation,</i></li> <li>• <i>Agile Banking</i></li> </ul>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>Windward Bank does not share with nonaffiliates so that they can market to you.</i></li> </ul>
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"> <li>• <i>Our joint marketing partners include investment and credit card companies.</i></li> </ul>
Other important information	
<p>We are committed to protecting your privacy by maintaining physical, electronic, and procedural safeguards in compliance with Federal and State regulations, to guard your nonpublic personal information.</p>	