

Federal regulations require that we send out our Privacy Policy annually to all of our customers. This Privacy Policy explains what type of information we collect from our customers and how we are committed to keeping that information safe.

**Information We Collect.** We collect only the information that is needed in order to understand our customers' financial needs, improve products and services, comply with laws and regulations, provide enhanced customer service, and protect our customers from fraud.

**Keeping Your Information Safe.** We understand how important it is to keep your information confidential. Whether you bank online or in person, we have safeguards in place to protect your information and maintain your trust. You can be confident that we **do not** sell your information to outside companies.

We take our commitment to keeping your information safe very seriously and we thank you for your trust in us. The enclosed notice provides more detail about the information we collect and disclose and explains how we handle privacy as it relates to you and your accounts.



**Rick Barz**  
President & CEO  
ISABELLA BANK

As your Bank, you trust us to keep your personal information safe. We want to assure you we take that responsibility very seriously. This privacy policy outlines how we collect information and how we keep it safe. It applies to all individuals who obtain financial products or services from us to be used primarily for personal, family, or household purposes. While this notice does not apply to our business or organizational customers, our policies and practices include the safekeeping and confidentiality of all customer information.

#### Our Affiliates

This privacy policy applies to Isabella Bank and its affiliates which include Isabella Bank Corporation, Isabella Insurance Agency, Inc., Pioneer Mortgage LLC, Corporate Title Agency, LLC, IB&T Employee Leasing, LLC and Financial Group Information Services Inc. collectively referred to as "we" in this privacy notice.

#### Keeping Your Personal Information Safe

We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your *nonpublic personal information*. Our employees access your information only when they need to do so in order to carry out their jobs and they are required to maintain your confidentiality. For example, when you make a new loan request, make a deposit, etc.

##### What is Nonpublic Personal Information?

Nonpublic personal information is any information that is not available through resources such as telephone directories and government records.

#### Where We Gather Information From and How We Use It

We collect nonpublic personal information in order to process loan requests, open new accounts, take deposits, offer products and services, and fulfill regulatory requirements.

We gather nonpublic personal information from:

- You as you inquire/apply for our products and services.
- Transactions you complete with us or other parties.
- Consumer reporting agencies regarding your credit history.

#### When We Disclose Information

You can be assured that **we do not sell your information to other companies**. Furthermore, we do not disclose any nonpublic personal information that we collect, as described above, about our customers or former customers to anyone, except as required or permitted by law. Some of these exceptions include when:

- You request us to disclose the information.
- It is necessary to service your account or prevent unauthorized transactions.
- It is at a legal request (*subpoenas, court order, government examination*).
- It protects against fraud.
- We are permitted by law (*e.g. sharing with our data processors, credit bureaus, collection agencies, and check printers*).
- You authorize us to process or service a transaction or product that Isabella Bank offers jointly with another company and the information is needed in order to process your request (*e.g. credit card programs, securities broker-dealers, and insurance programs*).

#### Providing Services to Meet Your Financial Needs

We strive to offer you products and services which will meet your financial needs. While the majority of our products and services are directly from Isabella Bank, we do partner with other companies to enhance our financial offerings. We may disclose all of the nonpublic personal information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with whom we have a joint marketing agreement. A *joint marketing agreement* is a written contract we have with another financial institution to market either one or both of the institutions' products or services.

#### Our Commitment to Confidentiality

In addition to our strong commitment to confidentiality, we also require our vendors and suppliers to maintain similar standards of conduct regarding the privacy of nonpublic personal information which may be provided to them. These providers are bound by written contract to maintain this confidentiality.

#### Privacy Policy Guidelines

We supply a copy of our privacy policy when you open a new account and we also send a copy of it out to all customers on a yearly basis. A copy of our current privacy policy can be found at [www.isbellabank.com](http://www.isbellabank.com) or at any of our office locations.