

FACTS**WHAT DOES WINDWARD 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and account balances
- Payment history and transaction history
- Overdraft history and account transactions

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 Windward Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Windward 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	Yes	No
For our affiliates' everyday business purposes-- information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

To limit our sharing

- Call toll-free (800)865-7653

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we provided or sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call toll-free (800)865-7653 or go to www.windwardbank.com

Who we are

Who is providing this notice? Windward Bank, A Division of Martha's Vineyard Bank.

What we do

How does Windward 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 Windward Bank collect my personal information? We collect your personal information, for example, when you

- open an account or pay your bills
- use your credit or debit card or seek financial or tax advice
- make deposits or withdrawals from your account

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing? Federal law gives you the right to limit only

- 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

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else? Your choices will apply to everyone on your account - unless you tell us otherwise.

Definitions

Affiliates Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include financial companies, such as Martha's Vineyard Bank or Martha's Vineyard Investment Advisors; nonfinancial companies, such as Agile Banking.*

Nonaffiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Windward Bank does not share with nonaffiliates so they can market to you.*

Joint marketing A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partner(s) include investment, insurance and credit card companies.*

Other important information

Other Privacy Statement

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.

Institutions within Windward Bank
 Martha's Vineyard Investment Advisors, Vineyard Sound Insurance
 Martha's Vineyard Bank, Martha's Vineyard Bank Charitable Foundation
 Agile Banking