

## Online Privacy Policy

Cortland Bank protects your personal information from unauthorized access and use; we use security measures that comply with federal law. This policy outlines how we protect the online privacy of our customers and the practices of Cortland Bank and its affiliates that are used to collect information from visitors to our online portals including but not limited to our websites or mobile applications.

Cortland Bank will protect the personal information of its customers by maintaining strong security controls to ensure that customer information in our files, on Cortland Bank computers/servers and on the Internet websites under Cortland Bank licensing are protected both online and off-line. We utilize data encryption to guard against unauthorized access to personal records and to help ensure the accuracy of communications and transactions. Cortland Bank will partner only with businesses that follow strict confidentiality requirements and offer products designed to enhance the well-being of our customers.

Please also refer to our general Privacy Policy (<https://www.cortland-banks.com/docs/default-source/pdfs/cortland-banks-privacy-policy.pdf?sfvrsn=2>) for additional information regarding other general privacy practices and your privacy rights. Also, you may be subject to other contractual terms in accordance with products/services you obtain and their related agreements.

**What information do we collect?** We collect information from you when you subscribe to our marketing campaigns, respond to a survey, fill out a form or respond to our emails. When ordering or registering on our site, as appropriate, you may be asked to enter the following personal information: your name, e-mail address, mailing address or phone number.

**Can I visit without sharing information?** You may visit our site anonymously without submitting any personally identifiable information. However, certain transactions and applications will require you to enter personally identifiable information. Once you sign in or begin completing an application, you are no longer anonymous because we need to identify you to provide those services. You can manually delete cookies after each session or set your browser to regularly delete cookies. Please note this may require you to identify yourself more frequently as services like Online Banking require you to accept cookies or similar files to function.

**What information do we share?** Please refer to our general Privacy Policy (<https://www.cortland-banks.com/docs/default-source/pdfs/cortland-banks-privacy-policy.pdf?sfvrsn=2>) about the parties who receive personal and sometimes nonpublic information from us as we conduct business of the Bank.

**What do we use your information for?** Any of the information we collect from you may be used in one of the following ways: • To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you) • To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs) • To administer a contest, promotion, survey or other site feature • To send periodic emails. The email address you provide may be used to send you information, respond to inquiries, and/or other requests or questions.

**How do we protect your information?** We implement a variety of security measures to maintain the safety of your personal information when you enter, submit or access your personal information. Our

systems use technology security features to protect you and your financial information. This technology includes SSL/TLS encryption and enhanced Multi-Factor Authentication (MFA).

**Do we use cookies?** Yes (Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. Cookies do NOT transmit any personal information about you. The browsers of most computers, smartphones and other internet access devices are set up to accept cookies. You can refuse to accept these cookies through your browser settings. You will need to manage your cookie settings for each device and browser you use. If you choose to reject cookies, you may not be able to use the full functionality of our sites. You also may not receive customized advertising or other offers from us that may be relevant to your interests and needs. We use cookies to keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

**What is Interest-Based Advertising?** Cortland Bank and its affiliates may collect personally identifiable information about your online activities over time and across different web sites when you use our sites. Some of the advertisements that click-through to our sites and/or may be on our sites contain cookies that allow for the monitoring of your response to these advertisements (sometimes referred to as interest-based advertisements). Our advertisements may also appear on other websites that use the same advertising service providers as we do. These advertising service providers may use your browsing history across websites to choose which advertisements to display to you.

If you do not wish to have us and/or our third-party advertising service providers know which advertisements and subsequent websites you have viewed, you may opt-out at AboutAds\* ([www.aboutads.info/choices/](http://www.aboutads.info/choices/)\* established by the Digital Advertising Alliance). The Digital Advertising Alliance\* ([www.aboutads.info/](http://www.aboutads.info/)\*) website contains important information on cookies, behavioral advertising, and what opting out will and will not do and choices you can make regarding interest-based advertisements. *Please note: opting out of behavioral advertising will not stop you from receiving advertisements. You will still see the same number of advertisements as before, but they may not be as relevant to you. If you use other computers or browsers and want to opt out of interest based advertisements, you will need to repeat this process for each computer or browser. If you delete your Cookies and want to continue to be opted out of interest based advertisements you may have to repeat this opt-out process.*

#### **What about email communications?**

When you choose to provide Cortland Bank with an email address as an accepted communication channel, you are consenting to Cortland Bank occasionally emailing you about products, services and information that may be of interest to you. We will never ask you to provide or confirm any account or personal information through email unless a secure link is established for that purpose.

Under various Federal and State laws and regulations, members may choose to opt-out of receiving promotional emails from Cortland Bank by clicking on the "unsubscribe" link located in the emailed communication. It may take 30 days to process your unsubscribe request. Please note that this does not unsubscribe you from receiving important notifications regarding your current accounts via email. This also does not stop any Online Banking alerts that you may have set up; to make changes, you will need to do so within those particular systems. *Note that an email is not a secure form of communication and there may be a loss of confidentiality when emailing personal information. Please do not send your*

*account number, social security number, PIN number, Login IDs or passwords through email unless a secure link is established for that purpose.*

**What about links to Other Third-Party Websites?**

Cortland Bank provides links to other websites for convenience and informational purposes only. Users should be aware that when you select a link on our sites to an external website, you are leaving Cortland Bank's site. You will see a disclosure on our site that alerts you when you are leaving our website. Cortland Bank does not own, operate or endorse the linked websites and is not responsible for the content or security of the websites. Cortland Bank does not make any guarantees or endorsements of products that may be available on the linked websites. Cortland Bank does not represent either you or the other party if you enter into a transaction on the websites. Privacy and security policies may differ from those practiced by Cortland Bank.

**What about Social Media?** You may also find additional information on our products and services through social media sites such as Facebook, Twitter, Google+, YouTube, LinkedIn and App Stores. Please keep in mind that any information you share is visible to all participants on these social media sites and you should never post any sensitive personal information (such as account number or social security number). Please review the Terms of Use and Privacy Policy on each of the social media sites, as they may not be the same as this Privacy Policy.

**Do you protect children's privacy online?** We are in compliance with the requirements of COPPA (Childrens' Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

By using our website, you are giving your consent to Cortland Bank's online privacy policy.

**What if changes are made to the Privacy Policy?** If we decide to change our privacy policy, we will post those changes on this page. This policy was last modified on June 29, 2016.