

GREENBANK PRIVACY POLICY

At GreenBank including all branch offices, divisions, and subsidiaries (affiliates) we know and understand that you as a consumer expect your personal financial information to be held in the strictest confidence and you have entrusted us with this responsibility. For over 100 years we have respected and protected customer privacy and the trust we have built is vital to our business. We are deeply committed to continuing to earn your trust as we guard with constant vigilance and zeal your privacy.

We want you to understand our Privacy Policy and how we use various methods including technology to maintain and use customer information to provide you, as effectively and conveniently as possible, a broad range of the best financial products and services available.

The privacy of your information is protected by state and federal laws and by every employee of this company. To you our individual customer we submit the following privacy pledge as adopted by our Board of Directors:

GreenBank's Privacy Pledge

- We will always value the trust of our customers and the importance of keeping their personal financial information confidential.
- We will provide our customers with our policy on using their financial information responsibly and protecting it.
- We will hold our employees to the highest standard of conduct in ensuring the confidentiality of customer information.
- We will hold any personal medical information about our customers sacred and will NOT use it for marketing purposes or in making credit decisions.
- We will use information responsibly in order to provide our customers with significant benefits, including fraud prevention, improved products and services and to comply with laws.
- We will establish procedures to maintain accurate information and respond in a timely manner to our customers' request to change or correct information.

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- We will use a combination of safeguards to protect our customers against the criminal use of their information and prevent unauthorized access to it.
- We will offer our customers the option of restricting information shared with third parties, not otherwise permitted by law, for marketing purposes and honor their preferences.
- We will require the companies we do business with to abide by our privacy policy to maintain the confidentiality of our customers' information.

Who is Covered by the Privacy Policy

The policy serves as a standard for all of our employees for collection, use, retention, and security of nonpublic personal information of our consumer customers who have a continuing relationship with us, such as a deposit account, loan account, trust account, credit card, or safe deposit box.

We provide our Privacy Policy notice to customers when they apply to open a new account and annually thereafter. If we decide to change our policies to share additional information about you, not permitted by law, we will notify you in advance.

If you decide to close your account(s) or become an inactive customer, we will continue to adhere to the privacy policy as described.

A separate policy for online banking consumer customers on the Internet is posted on the website for their access at www.greenbankusa.com.

The GreenBank family of companies includes the following financial service providers: a finance company subsidiary known as Superior Financial Services, Inc., an automobile finance subsidiary known as GCB Acceptance Corporation, and a title insurance subsidiary known as Fairway Title Company. The bank has one internal mortgage division that provides secondary market financing for long-term consumer mortgage loans originated in the bank.

What Information We Collect

We receive and collect “nonpublic personal information” about you from various sources, including information from:

- Your requests or applications for products or services, such as your income in a loan application;
- Your transactions with us, our affiliates or others, such as your account balance or mortgage information;
- Consumer reporting agencies (credit bureaus), such as your credit history.

“Nonpublic personal information” is personally identifiable nonpublic financial information about you that we obtain in connection with providing a financial product or service to you. For example, nonpublic personal information includes information from your loan application or deposit application such as Social Security number, assets and income or information relating to your transactions with us such as account balance, payment history, and overdraft history. Other examples of nonpublic personal information is information we receive from third parties such as consumer reporting agencies and information obtained at your request such as information necessary to develop a personal financial profile or plan. We collect and use only information that is needed to serve you and to conduct our business. As examples, we use information for identification purposes to protect your accounts and guard against unauthorized access to funds or information, to identify additional products or services that may meet a need or result in added savings or convenience, to help us identify and lessen potential risks or losses to the bank and its subsidiaries, and only in accordance with this policy.

What Information We Disclose

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law or authorized by you. Authorized disclosures result when you initiate and direct us to complete a transaction on your behalf such as a loan request when you give us permission to obtain a credit bureau report or in connection with the loan request, apply for credit insurance.

Further, we are pleased to inform you that we have never nor do we plan to sell your information to anyone.

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We are permitted under the Fair Credit Reporting Act to share information about our experiences or transactions with you or your account (such as your account balance and your payment history with us) within the GreenBank family of companies (our affiliates) including our consumer finance companies and our title insurance company as previously described. We may also share additional information about you or your account (such as information we receive from you in applications and information from credit reporting agencies) with our affiliates. For example consumer loan requests that the bank is unable to grant may be referred to our finance company affiliate, Superior Financial Services, Inc. and consumer loans our affiliate is unable to grant may be referred to the bank. Before we share information with our affiliates that does not relate solely to our transactions with you or your account (such as the application information or credit bureau information) you will have the opportunity to give us express written permission or to deny us permission to do so.

As permitted by regulation, we may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

Under law we may also disclose all of the information we collect, as previously described to companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements.

We are also permitted under law to disclose nonpublic personal information about you to “nonaffiliated third parties” (third parties that are not members of our corporate family) under certain circumstances. For example, we may disclose nonpublic personal information about you to other third parties to assist us in servicing your loan or account with us such as information to Mountain Life Insurance Company that provides mortgage, auto, or property insurance when customers fail to obtain required insurance necessary to protect the bank’s interest in an asset that secures certain loans. Another example is information to check printers; currently the John H. Harland Company is the primary supplier of customer checks. We also will disclose nonpublic personal information to protect against fraud, to law enforcement officials and bank regulatory authorities as required by law, to government

entities in response to lawful subpoenas, and to credit bureaus as is standard banking industry practice and permitted by state and federal law. We do not disclose any nonpublic personal information about you to any other third parties, except as permitted by law or as directed by you.

Our Security Procedures

We also take steps to protect nonpublic customer information to ensure the confidentiality and security of that information. We have established a separate written security information program that restricts access to your personal and account information to those employees who need to know that information to provide products or services to you and as required by law and regulation. Employees are also governed by a code of conduct that includes the responsibility to protect the confidentiality of customers' financial and other personal information. Employees who violate these standards will be subject to disciplinary measures. Under this information security program we maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

We choose very carefully the companies that provide services for us (imprinting checks, for example, or providing marketing assistance) and the financial institutions with which we have joint marketing agreements. These companies are contractually required to adhere to our standards of information security and confidentiality. They are not permitted to use our customer information for any purpose other than the intended service.

Accuracy of Your Information

We work diligently to ensure that the information about you is completely accurate. Should we discover inaccuracies in our records, we will take prompt action to make corrections.

A Joint Effort

We encourage you to join with us as we protect against unauthorized access to funds and information by exercising care and diligence through safeguarding for instance, your financial information, checkbook, credit

cards, or bank statements at home and elsewhere. Do not disclose your account information, personal identification numbers, passwords, or code words to others. Never provide confidential information to unknown callers or e-mail solicitors. Destroy unwanted mail solicitations for products or services that contain any of your personal information. As you partner with us in this effort, together we can reduce fraud, identity theft, and pretext calling that affects millions of Americans. Notify us at once if you believe you have been a victim or a potential victim of information or financial theft.