



## Customer Privacy Policy

### Introduction

Because of our interest in protecting customer privacy, First Savings Bank Northwest (including its affiliates) has adopted the following Privacy Policy, continuing our commitment to our valued customers. (Any references made in this policy to First Savings Bank Northwest or "Bank" shall be inclusive of all affiliates).

This Privacy Policy ("Policy") is intended to provide information about how we will treat private information. It is part of the Bank's general policies and applies to all of our customers and to those consumers who become our customers.

### Privacy of Information - Customer Expectations

Our customers expect privacy when it comes to their personal and financial affairs; and we should always strive to safeguard sensitive information about our customers that they have entrusted to us. This policy applies to all of the Bank's customers (including information that the Bank may still have about previous customers). Of course, this policy does not apply to information that does not personally identify our customers, such as aggregate or publicly available information (subject to applicable law) available from government records, widely distributed media or government mandated disclosures.

### Types of Information the Bank Collects

First Savings Bank Northwest collects nonpublic, personal information about our customers from many sources, including the following:

- Information we receive from customer applications or other forms
- Information about transactions with us, our affiliates, or others
- Information we receive from a consumer reporting agency

### Collection and Uses of Information

First Savings Bank Northwest collects and uses personal information to administer our business, to make products, services and other opportunities available to our customers, and to process, enforce and collect transactions and contracts regarding them. Subject to applicable law, we will retain private information as long as it is potentially useful or for the periods allowed or required by law. In

its activities involving private information, the Bank will consider reasonable expectations of privacy and endeavor to use the same good judgment, which has allowed us to gain the trust of our customers while still serving their needs.

## **Employee Obligations and Training**

First Savings Bank Northwest staff members sign a Code of Business Conduct and Ethics certification form, which obligates them to keep private customer information confidential. Furthermore, a customer information security certification/audit is performed annually or as needed to ensure employees are adhering to the privacy procedures and policy. When necessary, appropriate disciplinary measures are taken to enforce employee privacy responsibilities.

Customer privacy training is provided routinely to management and staff via the Bank's online compliance training module. Supplemental privacy training is also provided annually by the Compliance department in a staff meeting format. All new hires must complete the online course prior to gaining access to any consumer and customer information. Training schedules are established and monitored by the Compliance Department in coordination with the Human Resources Department. A training log is also maintained.

## **Disclosure of Account Information is Restricted**

First Savings Bank Northwest does not reveal specific information about its customer's accounts or other personally identifiable data to parties outside its corporate family unless it is under the following circumstances: (1) the customer requests or authorizes disclosure, (2) the information is provided to help complete a transaction initiated by the customer, (3) the disclosure is otherwise authorized or required by law, (4) to the extent permissible under the Right to Financial Privacy Act, (5) to a consumer reporting agency under the Fair Credit Reporting Act, 6) to regulatory agencies that are rating and assessing the Bank's compliance with industry standards, 7) and the Bank's attorney(s) and auditor(s), as part of their scope of work provided on behalf of the Bank.

## **Maintaining Customer Privacy When We Do Business Outside Our Organization**

It is sometimes necessary to provide personally identifiable information about our customers to a party outside our organization, such as to a vendor or services company that we hire to prepare account statements or to provide support services for one or more of our products.

Vendors and other independent third parties that provide critical support services in conjunction with First Savings Bank's banking activities are required to review and sign a formal confidentiality agreement. This agreement binds these vendors to the same standards and level of confidentiality and controls as those instituted by First Savings Bank Northwest. Copies of the signed agreements are retained by the Compliance Officer.

## **Issuance of Privacy Disclosures to New Customers**

Whenever a new consumer establishes an ongoing, formal customer relationship with First Savings Bank Northwest, an initial privacy notice in printed format must be provided to the customer. A

formal, ongoing customer relationship can be further defined as those who have depository and loan accounts with First Savings Bank. This also includes those who utilize the Bank's safekeeping services (safe deposit boxes). Oral description of the notice is not deemed adequate.

## **Issuance of Annual Privacy Notices**

On an annual basis, First Savings Bank Northwest will provide to customers with a continuing relationship an annual privacy notice. The notice will be provided in a clear and conspicuous manner to each customer. However, it is acceptable to provide a single notice for joint account holders. For customers with a deposit account and/or safe deposit box, the annual notice will be provided every June; for loan customers, the notice will be provided every January.

## **Privacy Notice Content (Initial and Annual)**

The privacy notice provided initially and in subsequent annual issuances will contain the following information:

- Insights regarding the information collected
- Statement that we do not disclose any nonpublic information about our customers or former customers to anyone, except as permitted by law
- Statement(s) regarding the bank's policies and procedures with respect to protecting the confidentiality, security, and integrity of nonpublic personal information.

## **Protecting the Integrity and Security of Customer Information**

At First Savings Bank Northwest, we protect consumer privacy by promoting that only employees who have a business reason for knowing information have access to it. In addition, access to data processing system functions and applications is on a need-to-know basis and is commensurate with employee duties and responsibilities.

First Savings Bank has adopted reasonable procedures to protect the security of private customer information, and it attempts to collect and retain accurate information.

## **Changes and Availability of Policy**

Staff members sign a Customer Privacy Policy certification form, which indicates that the most up-to-date policy, along with any changes or revisions, were reviewed and read. A copy of this policy can be obtained from the Compliance Department.

## **Questions**

Any questions or concerns regarding First Savings Bank's privacy policy should be directed to the Compliance Department.

Board Approved: April 16, 2008