

ONLINE PRIVACY POLICY

This Online Privacy Policy describes ways in which Winchester Savings Bank collects and uses information when a User accesses Winchester Savings Bank's website (the "Site") and other online services.

Personal Information We Collect Online

"Personal Information" means personally identifiable information such as information you provide online, including in forms, surveys, applications or other means, such as your name, postal or email addresses, telephone, fax or mobile numbers, or account numbers.

How We Use Personal Information

We may use Personal Information:

- to respond to your inquiries and fulfill your requests;
- to send you important information regarding the Site, including changes to our terms, conditions, and policies and/or other administrative information;
- to send you marketing communications that we believe may be of interest to you;
- to personalize your experience on the Site by presenting products and offers tailored to you;
- to verify your identity and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions, and maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- to allow you to participate in surveys, sweepstakes, contests and similar promotions and to administer these activities (which activities may have additional rules and additional information about how we use and disclose Personal Information);
- to allow you to use our online financial planning tools (however, we will let you know when we plan to collect and save information, and we will give you the option not to have this information saved);
- for our business purposes, such as data analysis, audits, developing new products, enhancing our Site, improving our services, identifying usage trends and determining the effectiveness of our promotional campaigns; and
- for risk control, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.

How We Collect and Use Other Information

We and our third-party service providers may collect and use Personal Information in a variety of ways, including:

- **Through your browser:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. We use this information to ensure that our Site functions properly and for security purposes.
- **Using cookies:** Cookies are pieces of information stored directly on the device you are using. Cookies we use do not contain or capture unencrypted Personal Information. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, and language preferences. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the Site, and to recognize your device to allow your use of our online products. We also gather statistical information about the usage of the Site in order to continually improve the design and functionality, to monitor responses to our advertisements, to understand how customers use the Site and to assist us with resolving questions regarding the Site. We may also use cookies to present tailored ads to you including ads that appear within online and mobile banking and to analyze the effectiveness of our advertisements and determine whether you might be interested in new products or services.

You can refuse to accept these cookies, and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Site and some online products. For example, we will not be able to recognize your device and you will need to answer a challenge question each time you log on. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

- Google Analytics: Like many other websites, we may employ third-party services, such as Google Analytics, to gather, collect and analyze non-personally identifiable information when available (such as age, gender, location, etc.). These third-party sources provide us with a summary that is statistical in nature and cannot be tracked back to a specific individual. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the <u>Google Analytics</u> <u>Terms of Service</u> and the <u>Google Privacy Policy</u>. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. Here is also a link to Google Analytics' currently available <u>web opt-outs</u>.
- **IP Address:** Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.