



THE COUNTRY BANK  
OF NEEDHAM

# Privacy Policy

Website and Digital Services Privacy Policy

Effective Date: April 9, 2026

## Important Notice

By accessing or using [www.thecountrybankofneedham.com](http://www.thecountrybankofneedham.com), any affiliated pages, or related services, you acknowledge this Privacy Policy and consent to the collection, use, disclosure, and protection of information as described here, subject to applicable law and any separate account, product, or service disclosures.

## 1. Scope

This Privacy Policy applies to [www.thecountrybankofneedham.com](http://www.thecountrybankofneedham.com), related landing pages, online forms, support channels, downloadable materials, and digital services we make available through the website.

Certain services may also be governed by separate agreements, disclosures, account terms, or notices. Where a separate notice applies to a specific product or regulated service, that notice supplements this Policy.

## 2. Information We May Collect

We may collect information you provide directly to us, information generated through your use of the website or services, and information obtained from permitted third-party sources.

Examples may include your name, business name, mailing address, email address, telephone number, account identifiers, transaction details, application details, device and browser information, IP address, usage logs, uploaded documents, support communications, consent records, government-issued identification details where required, risk-screening results, and other information reasonably necessary to provide, secure, and administer our services.

## 3. How We Collect Information

We may collect information when you visit our website, complete forms, create or manage accounts, request support, submit applications, upload documents, use interactive tools, communicate with us, or otherwise engage with our digital services.

We may also collect information through cookies, server logs, analytics technologies, fraud-prevention tools, session monitoring, device-recognition tools, and service providers that help us operate our website,

communications, and infrastructure.

#### **4. How We Use Information**

We may use collected information to operate and improve the website and our services; authenticate users; review requests and applications; communicate with you; process transactions or service actions; maintain internal records; enforce legal terms; protect against fraud, unauthorized activity, misuse, and security incidents; satisfy legal, regulatory, audit, and compliance obligations; and support analytics, reporting, service reliability, and business operations.

We may also use information to verify identity, evaluate eligibility, maintain account security, manage disputes, respond to lawful requests, and preserve audit trails relevant to website, payment, payroll, document, identity, or customer-service workflows.

#### **5. Legal Basis, Consent, and Permissible Purpose**

Where required, we rely on customer authorization, contractual necessity, legitimate business purposes, legal obligations, or other lawful bases recognized under applicable law.

If we access, verify, receive, or transmit sensitive information in connection with financial, identity, payroll, payment, document, compliance, or decisioning workflows, we may maintain records of user authorization, consent capture, disclosures, verification events, permissible-purpose assertions, and transmission logs for compliance, audit, security, fraud prevention, and recordkeeping purposes.

#### **6. Cookies, Analytics, and Similar Technologies**

We may use cookies, pixels, local storage, tags, and similar technologies to remember preferences, maintain secure sessions, detect fraud, understand usage patterns, improve website performance, and measure service reliability and communications effectiveness.

You may be able to control cookies through your browser settings. Disabling certain technologies may affect website functionality, session persistence, or access to certain features.

#### **7. How We Share Information**

We do not sell personal information. We may share information as reasonably necessary with hosting providers, infrastructure vendors, payment processors, document and communications vendors, identity or fraud-prevention providers, analytics providers, professional advisors, auditors, affiliates, counterparties, service providers performing work on our behalf, and government, regulatory, or law-enforcement authorities where required or permitted by law.

We may also share information in connection with account servicing, transaction processing, disputes, complaints, risk management, sanctions screening, legal claims, corporate restructuring, or to protect the rights, property, or safety of the Bank, our users, or others.

#### **8. Financial Privacy, GLBA, and Related Notices**

If you apply for or obtain a financial product or service from us, additional privacy notices may apply. Any financial privacy notice provided for a regulated product or service supplements this Privacy Policy.

Where applicable, information collected in connection with consumer financial services may be handled in accordance with the Gramm-Leach-Bliley Act, related implementing regulations, and other applicable federal or state requirements.

## **9. Data Security**

We maintain administrative, technical, and physical safeguards designed to protect information against unauthorized access, loss, misuse, alteration, and disclosure. Such safeguards may include access controls, authentication measures, encryption where appropriate, secure transmission methods, monitoring, logging, vendor-management controls, secure development and deployment practices, and role-based restrictions.

No system can guarantee absolute security. You are responsible for safeguarding your credentials, devices, and any systems you use to access our services.

## **10. Data Retention**

We retain information for as long as reasonably necessary for the purposes described in this Policy, including to provide services, maintain records, resolve disputes, enforce agreements, investigate incidents, and comply with legal, regulatory, tax, accounting, audit, reporting, and document-retention obligations.

Retention periods may vary depending on the type of information, the service involved, litigation holds, contractual requirements, and applicable law.

## **11. Your Choices and Rights**

Subject to applicable law, you may have the right to request access to certain personal information, request correction of inaccurate information, request deletion of certain information, or limit certain uses or disclosures.

Residents of certain states may have additional privacy rights. We may need to verify your identity before processing a request.

## **12. External Links and Third-Party Services**

Our website may contain links to third-party sites, applications, or services. We are not responsible for the privacy, security, or content practices of third parties. Review their privacy notices before providing information.

## **13. Children's Privacy**

Our website and services are not directed to children under 13, and we do not knowingly collect personal information online from children under 13 without appropriate legal authorization.

## **14. Changes to This Policy**

We may revise this Privacy Policy from time to time. The updated version will be posted on the website with a revised effective date. Continued use of the website or services after an update constitutes acceptance of the revised Policy, subject to applicable law.

## **15. Contact Information**

Questions or requests regarding this Privacy Policy may be directed to:

The Country Bank of Needham

Website: [www.thecountrybankofneedham.com](http://www.thecountrybankofneedham.com)

Support: [support@thecountrybankofneedham.com](mailto:support@thecountrybankofneedham.com)

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