

Policy and Procedures

Procedure NO. A01

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Program Mandate

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Security Commitment

Since the debut of The Country Bank Of Needham in 1996, The Country Bank Of Needham has been committed to providing our customers with cutting-edge online banking services and providing them with all the benefits that come with being an industry leader: convenience, robust service and a safe and secure environment for online banking.

We currently use some of the most sophisticated commercially-available technologies to provide you with a powerful and multi-functional online experience that leads the way through attractive design, relevant information and ease of use with a high standard of online security. The Country Bank Of Needham offers online banking, brokerage, mortgage and bill pay services to our customers. These services allow you to access your account information through an authentication process, which uses personal access codes and passwords.

We employ a number of measures, as described below, to provide these services in a secure manner. These measures allow us to properly authenticate your identity when you access our services and protect your information as it traverses the Internet between your PC and The Country Bank Of Needham. Our security measures must rely on these access codes remaining confidential. We strongly recommend that you do not share these access codes and passwords with others.

Certain third party providers such as bill pay and bill presentment sites, financial aggregator sites, brokerage sites or other e-commerce sites may offer to provide services to you by accessing your accounts using your access codes and passwords. While it is your decision whether or not to use these services, please be advised that we cannot be responsible for the security and accuracy of the information displayed to you anywhere but at the www.TheCountryBankOfNeedham.com website. The Country Bank Of Needham continually strives to remain on the cutting edge of Internet technology. But, Internet security is a cooperative effort, and we need your assistance.

Security Challenge Questions

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Create, revise, Issue Policies and procedures

Your online security is of the utmost importance to The Country Bank Of Needham. As identity thieves grow more and more sophisticated, usernames and passwords are simply not enough to protect you anymore. That's why Online Banking has another level of identity verification with Challenge Questions. You'll be required to select five secret challenge questions and answers that only you should know. If we have any reason to suspect that someone other than you is trying to log in with your username and password, we will prompt the user to answer one of your challenge questions. Online Banking's Challenge Questions feature is an added layer of security that we use to further verify your identity and will help prevent unauthorized access to your accounts.

Remember: The Country Bank Of Needham will never ask you to provide answers to security questions via email.

Security Tokens

Our Business Online customers who conduct certain higher risk transactions are provided an additional level of authentication via security tokens. This extra layer of security provides you with an additional safeguard even if someone obtains your username and password they would still need access to the security token to gain access to your accounts.

Security Alerts

The Country Bank Of Needham will notify you via email or web-enabled device to confirm any changes you make to your account. Notifications are sent automatically when we receive:

- A mailing address or email address change
 - A phone number change
 - PIN or password change

Please pay careful attention to these alerts and notify us immediately if it was not YOU who initiated the change. In addition you'll receive two Security Alerts that someone has tried to access your accounts and failed; one in Online Banking's Security Alert Center and one via email. That's why it's important to make sure you keep Online Banking updated with your current email address. These Security Alerts cannot be deleted manually. This additional security measure prevents someone who has fraudulently accessed your accounts from deleting the alerts before you have a chance to see them.

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They will be automatically deleted from the system after 30 days.

128-bit SSL encryption

Encryption is the scrambling of information for transmission back and forth between two points.

This technology allows for secure transmittal on the internet by encoding the data using a mathematical formula that scrambles the data. A key is then required to decode the transmitted data. SSL encrypts, or scrambles, your user name and password before they leave your computer and then unscrambles them at the receiving end.

Extended Validation (EV) SSL Certificate

- Watch for the green bar. When using The Country Bank Of Needham secure, SSL-encrypted online banking system, you will see a green bar appear (see below).
 - You will also find the "s" at the end of "http" for secure.

Session Timeouts

To reduce the risk of unauthorized account access from an unattended computer, The Country Bank Of Needham system will automatically log you off from Country Bank of needham or Needham Business Online after 20 minutes of inactivity. To resume your banking activity, you'll need to re-enter your user credentials. Last Login Date/Time The Country Bank Of Needham displays your last login date/time on the lower left-hand side of the My Accounts page. If that date does not reflect your latest log in, or you feel that the information may be inaccurate, call (513) 466-8103, daily 6:00 a.m. to midnight ET.

Secure Firewalls

To protect your information and prevent security breaches, we use the latest firewall technologies, all of which are monitored 24x7. The firewalls provide a layer of protection between the Internet and The Country Bank Of Needham internal network, designed to block and filter malicious traffic.