



PRIVACY POLICY

PRIVACY POLICY

First Internet Bank of Indiana ("First IB," "we," or "us") understands how important personal privacy is to our customers and site visitors ("you"). We have developed the following privacy policy to address our collection and disclosure of confidential information.

This policy is effective January 1, 2008 and supersedes all previously published versions. This policy applies to all persons and/or businesses who visit our website as well as those who seek to obtain or do obtain a financial product or service from us. This policy will cover information we may collect about you during the course of our relationship as well as after the relationship has ended. Please note that we are not responsible for the collection, use or security of information by companies or organizations outside of First IB that may be linked to our website. We strongly encourage you to read the privacy policies of websites reached through the links from the First IB website.

VISITING OUR WEBSITE

When you visit our website, we receive certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times, and referring website addresses. This data does not identify you uniquely. You may visit our website and find out about our products and services, check our rates, and read more about us without giving us any additional information about yourself.

First IB is committed to continuous improvement of our website. We may use software tools and/or "cookies" to gather information about site visitors' browsing activities in order to target areas for improvement. A "cookie" is information sent from a website to a visitor's computer while he or she is visiting the site. Information gathered may include date and time of visits, pages viewed, time spent at the site, browser types, Internet service provider, and the site visited just before and just after the First IB site.

We will also track browsing activities of customers who have accounts with First IB and who use our online banking and bill payment services. As part of our security procedures, First IB may use a cookie to authenticate a user's request.

OUR COLLECTION AND RETENTION OF PERSONAL INFORMATION ABOUT YOU

Information regarding our customers is used solely in the legitimate conduct of our business, to deliver superior service and to design products and special offers that better meet our customers' needs. Customer information will not be used, collected, or retained unless First IB has a legitimate business purpose to do so.

We will collect and retain personal information including, but not limited to, social security number, mailing address, email address, telephone and fax numbers, employment information, and demographic and customer identification, directly from you through requests for information, the application process, and value-added services that require personal contact with you. We will also collect and retain personal information indirectly from you through your business activities and transactions with us including, but not limited to, deposits, checks, and electronic funds transfers. We will also collect and retain financial information, data, and employment history about you from consumer reporting agencies.

OUR DISCLOSURE OF YOUR PERSONAL INFORMATION

First IB does not and will not provide or sell your personal information to any third party for independent use. Further, we will not disclose your personal information to external organizations unless (1) you request or authorize it; (2) the information is provided to help complete a transaction initiated by you; (3) the information is provided to a reputable credit bureau or similar information reporting agency; or (4) the disclosure otherwise is lawfully permitted or required.

First IB is required, for example, to share information about you and your products and services with us with parties named in a lawsuit or administrative action when we are served with a subpoena or court order. We also are required to share this information with federal or state regulatory authorities, such as banking examiners or the Internal Revenue Service, as authorized by federal or state law.

First IB contracts with outside service providers to develop and maintain our transaction processing systems, prepare your account statements, authorize credit card transactions, and provide other materials or services on our behalf. All third-party service providers working with or on behalf of First IB agree to safeguard our information about you and your products and services with us and must abide by applicable law. Whenever we hire other organizations to provide support services, we require them to conform to our privacy standards.

First IB occasionally enters into joint marketing agreements and/or promotions with third parties in order to attract new accounts and to add value to existing services. First IB reserves the right to share only the necessary information with these third parties to provide the value-added services, products, promotional bonus, and/or prizes. For instance, we may run a promotion with a third party that offers a cash bonus to you for opening an account. We would confirm with the third party that you have opened an account with us, the type of account, and the date opened. We may also offer sweepstakes through a credit card network that would require us to share your contact information with a third-party contest administrator in the event you are selected as a winner. (These examples are for illustrative purposes only and do not limit the number or types of promotions into which First IB may enter.) **You may opt-out** of the disclosure of your personal information as described in this paragraph by notifying us in writing at the address below or by toll-free telephone at (888) 873-3424. Doing so will result in your forfeiture of any related value-added service, product, promotional bonus, and/or prize. We must receive your opt-out request in time to give us a reasonable opportunity to act on it before the third party requests or requires your information. For joint accounts, First IB will treat an opt out direction by either account owner as applying to the entire account.

First IB may disclose all of the information we collect, as described above, within First IB and other affiliated First IB companies, including: (1) Our administrative and service units which, for example, service your accounts or prepare your account statements and (2) First IB companies which provide financial and other services. These include, but are not limited to, consumer bankers, mortgage lenders and consumer lenders. By law, information that helps us identify you or is derived from your transactions and experiences with us may be shared among the First IB companies (a) for purposes other than direct marketing, and (b) **unless you instruct us otherwise**, for direct marketing purposes. You can instruct us not to share other personal financial information about you with other First IB companies. In addition, if you select that option, we will not share any information about you with our affiliates for direct marketing purposes. Indicate your preference by notifying us in writing at the address below or by toll-free telephone at (888) 873-3424 at any time. For joint accounts, First IB will treat an opt out direction by either account owner as applying to the entire account. Please note that if you choose not to receive product information by direct mail or telephone, you may continue to receive marketing information by mail about your First IB accounts. Marketing information may be included in regular account mailings and statements, when you visit us online or at an ATM.

California and Vermont residents only: We will not share your nonpublic personal information with any nonaffiliated third parties except as permitted by law. You must opt-in to the disclosure of your personal information as described in the paragraph above by notifying us in writing at the address below if you wish to be eligible to receive such value-added services, products, promotional bonuses, and/or prizes.

EMPLOYEE ACCESS TO YOUR PERSONAL INFORMATION

Because First IB takes your privacy seriously we limit the availability of your information to our employees. Employees may only access your information for legitimate business purposes. Each employee has been made aware of his or her responsibilities to safeguard your personal information. We take appropriate disciplinary measures to enforce employee privacy responsibilities.

SECURITY PROCEDURES TO PROTECT INFORMATION

First IB maintains a strong security standard in order to help prevent against loss or unauthorized access to your personal information. Our website addresses our Security policy in greater detail.

MAINTENANCE OF ACCURATE INFORMATION

We have procedures to help assure that your financial information is accurate, current, and complete in accordance with commercial standards. We also have procedures to respond to your requests to correct inaccurate information in a timely manner.

We make every attempt to keep customer files complete, up-to-date, and accurate. We encourage our customers to contact us immediately to correct any outdated or incorrect personal information. Customers may review the name, address, phone number, and email address we have on file at any time through our online banking system; changes in mailing address, phone number, and email address may be initiated through the online banking system. In addition, customers may contact us with questions about or changes to their personal records in writing at: First Internet Bank of Indiana, 7820 Innovation Boulevard, Suite 210, Indianapolis, IN 46278.

CHANGES TO THIS POLICY

From time to time, First IB may make changes to this policy in order to comply with regulations and/or legislation and to reflect current business practices. The policy in effect will always be available through the public website of First IB and will be conspicuously marked with an effective date. At least annually and any time significant policy changes are made, First IB will send a copy of its privacy policy to all customers of record as of the updated policy's effective date. The policy may be sent either electronically or in paper form, depending on the manner in which each customer has elected to receive statements, notices and disclosures.