

THE COMMERCE BANK OF WASHINGTON

ONLINE BANKING PRIVACY POLICY

Effective May 31st, 2006

The Commerce Bank of Washington values your trust and respects your expectation of privacy. As such, we are committed to maintaining the confidentiality of your personal financial information. This document outlines our privacy policy for consumers who obtain services from us, such as [a deposit account, loan, or investment].

Our Collection and Use of Information about You. We may collect nonpublic personal information about you in order to understand your needs, administer our business, process transactions, and provide you with products and services. We obtain nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms (such as your name, address, social security number, assets and income);
- Information about your transactions with us, our affiliates, or others (such as your account balance, payment history, parties to transactions, and credit usage); and
- Information we receive from a consumer reporting agency (such as your creditworthiness and credit history).

Our Disclosure of Information. We may disclose all of the information we collect, as described above, to other financial institutions with whom we have joint marketing agreements, such as [securities broker-dealers,] [insurance agents and] [card issuers], so that they can market goods and services to you. We also may disclose:

- Some of this information, such as your name and address, to companies that perform marketing and other services on our behalf (e.g., to companies that assist us with mailings).
- Information regarding our experience and transactions with you with financial service providers, such as financial institutions, securities broker-dealers and insurance agents, with which we are related by common ownership or affiliated by corporate control, so that they may offer or provide additional services to you. We also may share other information we obtain about you with those companies (e.g., information from applications and credit reports), unless you notify us before the information is initially communicated that you do not want us to share that information. You can tell us not to share such information by writing to us at The Commerce Bank of Washington, Attn: Privacy Officer, 601

Union Street, Suite 3600, Seattle Washington 98101, or by calling us at 206 292-3900, or toll free at 800 998-4035 between 8:00 am and 5:00 pm (Pacific Time) Monday through Friday.

- Information about your accounts and transactions: (a) where it is necessary or helpful to effect, process or confirm your transactions; (b) to verify the existence, history and condition of your account for credit reporting agencies; (c) to comply with legal process, such as subpoenas and court orders; (d) to law enforcement authorities if we believe a crime has been committed; (e) if you give us your consent; and (f) as otherwise permitted by law.

We do not disclose nonpublic personal information about our current or former customers to unaffiliated third parties except as set forth in this policy.

State Rights. Depending on where you live, you may have additional privacy protections under some state laws. For example, certain state laws may restrict the types of information we may disclose about you, limit the parties with whom we may share such information, or require us to provide you with additional notices or opt-out rights. We will comply with applicable state laws before sharing non-public personal information about you. We may do this by sending a separate notice of those rights to you.

Maintaining Accurate Information. We have procedures in place that help us to maintain the accuracy of the personally identifiable information that we collect. Please write or call us to the information provided below if you believe that our information about you is incomplete, out-of-date, or incorrect.

Information Security. We restrict access to nonpublic personal information about you to those employees who have a need to know such information (e.g., to process your transactions or provide services to you). We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Changes to this Policy. We may amend (add to, delete, or change) the terms of this Privacy Policy from time to time. If required by law, we will provide you with a notice of the change.

Questions: Please contact us at 206 292-3900, or toll free at 800 998-4035 between 8:00 am -5:00 pm PST or write to The Commerce Bank of Washington, Attn: Privacy Officer, 601 Union Street, Suite 3600, Seattle Washington, 98101.