RECORDING OF MEETINGS POLICY

Introduction/Purpose

In conjunction with Opportunity Bank's Information Security Policy/Program (GLBA), this Recording of Meetings Policy addresses the expectations regarding the recording of meetings, telephone calls, discussions, trainings, or other conversations (herein collectively referred to "meeting(s)") at the Bank, offsite at Bank organized events, or via telephone or video conference. The intent of this policy is to strike a balance between the legitimate uses of audio and video recordings, and concerns including compliance with the law, privacy, and protection of proprietary or confidential information.

Policy Statement

It shall be the Policy of OBMT to ensure the use of recording technology for meetings shall be compliant with all applicable laws and regulations and consistent with the Bank's strategic objectives. All technology used for the purpose of recording meetings shall be approved prior to use. Procedures shall be developed to ensure compliance with this policy.

Scope

This Policy covers all devices with the capability to record meetings owned or operated by the bank, any devices that are present on Bank premises and offsite at Bank organized events or connected to Bank resources, but which may not be owned and operated by the Bank, and all employees, board members, and affiliates working on behalf of the Bank.

Prohibited Activity

To comply with state and federal laws, promote the freedom to share ideas, and to respect the privacy of all participants, the secret recording of meetings is explicitly prohibited. Employees and other Bank affiliates are also prohibited from arranging for others to record meetings unless specifically permitted under this policy. Neither can they knowingly receive or download recorded conversations, upload to the internet, or otherwise share, transmit, or publish such recordings except as permitted herein.

In addition to the above, the use of personal devices to record meetings is prohibited unless explicitly authorized by Bank Senior Management. Authorization by Senior Management must be in writing and signed by the Executive granting permission.

Consent to Record

There may be several legitimate reasons to create a recording of a meeting such as quality control, training, meeting minutes, or performance management. When a legitimate reason exists, one must be knowledgeable about how to record meetings while remaining in compliance with this policy and relevant laws. Employees and Bank affiliates must adhere to the law in the state in which the individual participating in the meeting resides. Some states require consent from both parties (recording and recorded) before a meeting can be recorded. When recording any Bank meeting, all parties must be notified prior to or upon commencement of the recorded session. This requirement applies to any recording method which results in any video and/or audio recording of the session, regardless of whether the recording is accomplished by a feature in a video conferencing application or using another program or device.

This notice could be included in a meeting invitation, agenda, training syllabus, in a separate communication, or occur upon the commencement of the meeting. The notice needs to be clear, readily apparent, easily understandable, and needs to allow a party who does not consent to the recording to refuse to participate. Because consent is specific, receipt of a notification does not establish a license for others participating in a meeting to also create their own recording. Neither does it guarantee access to any recording.

Use and Sharing of Recordings

To facilitate dialogue, recordings should not be shared outside of legitimate Bank purposes for which they were provided or created. Recordings may be used by employees and Bank affiliates for reasons including, but not limited to, providing ongoing training, assisting in producing meeting minutes, quality control for customer calls, complaint resolution, and performance management. Depending on the content, recordings may be subject to GLBA Privacy laws and other state and federal statutes. Therefore, recordings should only be shared with employees and Bank affiliates in furtherance of a legitimate Bank purpose. Recordings must not be posted on any public-facing internet page or shared with external individuals or entities not affiliated with the Bank without the approval of Senior Management. Any violation of this policy may result in disciplinary action up to and including termination.

Data Retention

Unless specifically in the Bank's Record Retention and Destruction Policy or in a more specific Bank policy or procedure that the recording is an official Bank record, recordings need not be maintained as an official record in accordance with our Record Retention and Destruction Policy. As such, recordings should generally be deleted as soon as they are no longer relevant. Recordings of meetings that are taken solely as memory aids, and for the purpose of the scribe to memorialize the meeting recording into meeting notes or minutes, should be deleted immediately after the meeting notes or minutes have been created.

Security

Surveillance cameras/equipment and software may be placed in Bank locations by authorized personnel to prevent or deter crimes, protect public safety, and to facilitate bank investigations into criminal activities or violations of Bank policy. Nothing in this policy should be read or understood to limit the ability of the Bank Security Officer or their designee to obtain, review, maintain, and share these recordings in any way which, in their view, furthers a legitimate public safety or investigative purpose and does not otherwise conflict with applicable state or federal law.

Nothing in this policy should be understood to limit the ability of anyone to openly record a law enforcement officer in the performance of their official duties, subject to applicable state or federal law.