



## **COMPANY INFORMATION PACKET**

## VENDOR INFORMATION

**Corporate Name:** Community National Bank dba CNB Custody

**Physical Address:** 225 Main Street  
Seneca, KS 66538

**Mailing Address:** P.O. Box 225  
Seneca, KS 66538

**Corporate Phone Number:** 785-336-6111

**Toll Free Number:** 1-800-680-0340

**Fax Number:** 785-336-2214

**E-mail Address:** [irainfo@cncustody.com](mailto:irainfo@cncustody.com)

**Website:** [www.cncustody.com](http://www.cncustody.com)

**Executive Team Contacts:** Brian Sells  
President  
785-336-6928

Jerry Lueger  
Senior Vice President  
(Compliance)  
785-336-6942

Michelle Thomas  
Executive for Marketing  
785-336-6927

## **HISTORY**

Community National Bank (CNB) was founded in 1984 as a traditional bank. The bank now has four locations to serve Seneca, Sabetha, Tonganoxie, and Basehor, Kansas. As a nationally chartered bank, CNB is regulated by the Office of the Comptroller of the Currency, an independent bureau of the U.S. Department of the Treasury.

CNB Custody is a division of Community National Bank who provides excellent customer service to IRA and Non-qualified accountholders with accounts in all 50 states. Your call will be answered by one of our excellent service staff. Our hours of operation are 8:00 a.m. – 4:30 p.m. CST.

## **PRODUCTS & SERVICES**

CNB Custody is custodian for self-directed IRA and non-qualified accounts providing recordkeeping and tax reporting. These services include the following account types: Traditional IRAs, Roth IRAs, SEP IRAs, Beneficiary IRAs, and Non-qualified accounts titled Joint with Rights of Survivorship, Tenants in Common, Trusts, UTMA's, and UGMA's.

Investment types that we custody include: annuities, mutual funds, business development companies, precious metals, certificates of deposit, private bank and holding company stock, exchange traded stock, interval funds, LLCs, private placements, promissory notes, precious metals, cryptocurrency, and real estate.

CNB reviews every investment for administrative feasibility before accepting for custody. Please call or email to verify if the investment you would like held at CNB has already been accepted for custody. If it has not been reviewed CNB will require:

- Request for Custody form completed by someone at the investment company
- A list of officers and principals
- List and explanation of any pending litigation
- Offering materials including prospectuses, offering memorandums, operating agreements, subscription agreements, etc.

CNB Custody does not perform due diligence on investments directed to be purchased.

## **ACCOUNTHOLDER DATA**

Our contract for an IRA or non-qualified investment account is with the accountholder. The accountholder has the option to designate a financial representative/advisor. CNB Custody provides recordkeeping services for transactions of the accountholder and reports the appropriate information to the IRS. All documents related to an accountholder's account will be maintained from the opening of the account. Details will be accessed as needed for maintenance, recordkeeping, and processing of transactions created at the direction of the accountholder or designated financial advisor.

We have documented privacy policies and procedures to protect confidential information. Personal Identifiable Information (PII) includes social security number, financial accounts, e-mail and mailing addresses, phone numbers, and date of birth. Encryption tools for PII exists to protect information.

Our privacy policy is provided as a separate attachment.

## **SECURITY/CYBERSECURITY**

Our employees are trained at least annually on security awareness.

User security is granted based upon roles and monitored for segregation of duties. Employee access is reviewed annually at a minimum or upon the change in employee status. Any terminated employee is blocked from information immediately upon termination. A disciplinary process exists for noncompliance with acceptable use of hardware, software, and data. Steps are in place to ensure confidential data may not be transferred to any unauthorized device (such as laptops, USB drives, CD/DVD, etc.).

Background checks are conducted on all employees. Independent contractors or vendors with access to information are required to sign a non-disclosure agreement. We also utilize a vendor management program, which provides due diligence on contractors and vendors.

## **RISK ASSESSMENTS**

We have a documented risk assessment security program for a variety of areas within the organization including our information systems. These assessments are performed according to a schedule, normally annually. The program includes identification and remediation of any findings. A third-party vendor provides internal and external penetration testing.