



## Privacy Policy

**Date: December 1, 2021**

### **Document Control**

**Document Id:** IBank Privacy Policy

**File Name:** BCP Documents

**Authorized By:** BOD

**Distribution:** Crisis Management Team,  
Senior Management Team members  
IBank Intranet Site

## Contents

Online Privacy Statement .....	3
What Information We Collect .....	3
How We Share Your Information.....	5
IBANK Mobile .....	5
Use of Aggregation Tools Through IBANK Digital Services .....	5
Cookies & Other Technologies .....	6
Behavioral Advertising & Online Tracking .....	7
Third Party Links .....	7
Security .....	8
Social Security Number/Government ID Protection Policy .....	8
Social Media .....	8
Children's Online Privacy Protection Act .....	8
Updating Your Information.....	8
Changes to this Online Privacy Statement.....	9
Governing Law .....	9

## Online Privacy Statement

**IBank, Inc.** is committed to protecting your privacy when you use IBank Digital Services. This U.S. Online Privacy Statement ("Statement") explains how we collect, use, share, and safeguard your information when you use our Digital Services.

**IBank** Refers to IBank, Inc. a Delaware Corporation, its U.S. affiliates and subsidiaries and service providers (collectively, "IBank", "we", "our").

**You/Your** Refers to Customers and visitors (including their agents and representatives).

**Digital Services** Refers to our websites, mobile applications, channels, pages, or accounts we operate on social media sites (e.g. Twitter, Facebook), and any other online interactions you may have with us.

**Use of our Digital Services** Refers to Visiting any Digital Services owned and controlled by us, receiving our e-mails and viewing our ads on third-party sites and other devices that link to this Statement; using our Digital Services to access your accounts, our Click-to-Chat service, conduct online transactions, etc.

When you visit our Digital Services, read our e-mails or interact with us on third-party sites, you are consenting to the terms of this Statement, except where a different online and/or mobile statement is posted indicating that it is intended to take the place of this Statement.

This policy is intended for residents of the United States and its territories. If you are not a resident of the United States or its territories, your information may be transferred or processed outside of your home country, including in the United States and its territories.

## What Information We Collect

**"Personal information"** refers to information that identifies (whether directly or indirectly) a particular individual, such as information you provide on our forms, surveys, remote deposit capture off your device, applications or similar online fields. Examples may include your name, postal address, unique device identifier, email address, telephone number, Social Security number, date of birth or account information.

**"Anonymous information"** means information that cannot reasonably be used to identify a particular individual. Examples may include information about your Internet browser, IP address, information collected through tracking technologies, demographic information that you provide to us (e.g., your household income) and aggregated or de-identified data.

**"Location information"** means information that may be collected by certain mobile applications that identifies your physical location. This information may be collected from your mobile device's location-aware features when you request certain services that are dependent on your physical location.

**"Biometric information"** means information such as your fingerprint or voice that you choose to provide to us for authentication and fraud prevention purposes. We will not collect your fingerprint or voice without your permission.

## **How We Use Your Information**

We may use your online information or combine with other information to:

- Personalize your Digital Services experience;
- Respond to your inquiries and fulfill your requests;
- Deliver marketing communications we believe may be of interest to you;
- Inform you about important information regarding Digital Services, products or services, changes to terms, conditions, and policies and/or other administrative information;
- Allow you to apply for products or services, process transactions, and evaluate your eligibility for such products or services;
- Verify your identity, authenticate you to use our Digital Services and verify your location;
- Allow you to participate in surveys and other forms of market research, sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;
- Allow you to use Digital Services financial planning tools. Information that you enter into one of these planning tools may be stored for future access and use. You have the option not to save the information by not using these tools or by not accepting the site cookies through your browser which can limit the site functionality;
- Perform activities such as data analysis, audits, usage trends to determine the effectiveness of our campaigns and as input into improving products and services and enhancing our Digital Services;
- Improve risk control for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements;
- Allow you to utilize Digital Services features by granting us access to information from your device such as contact lists, or geo-location when you request certain services;
- Use it in other ways as required or permitted by law or with your consent.

## How We Share Your Information

- We may share your information with our affiliates and third parties. For example, we may share your information with:
- IBANK affiliated Digital Services and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations;
- IBANK third-party service providers who perform services for us and help us operate our business;
- Other companies to bring you co-branded services, products or programs;
- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of IBANK businesses;
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

For U.S. customers, we will use and share information that we collect from or about you in accordance with the Customer Privacy Notice for your account (see links on this page), which provides choices in the use and sharing of information.

As a global company, we may share your personal information among IBANK affiliated Digital Services and businesses or service providers that may be located outside your home country in order to provide you with the highest quality products and services.

We may share Anonymous or aggregated information with third parties to help deliver products, services, and content which is better tailored to the users of our Digital Services and for other purposes.

## IBANK Mobile

IBANK offers you the ability to access some of our Digital Services through our mobile app. When you use our mobile app we collect information, such as your unique device identifier, screen resolution and other settings, your geo-location (with your permission), and other data used for anonymous analytical purposes. All IBANK mobile apps have their own terms of use and privacy policies for reference.

## Use of Aggregation Tools Through IBANK Digital Services

If you use any of our money management tools or other online aggregation services, we collect information about the accounts and relationships including registration information such as your name and e-mail address. We also collect information about the accounts

designated for the money management tools, such as account balances, transactions, transaction histories, e-mail information, bills, payment history and other account activity. We will not disclose any information about you we obtain solely through money management tools to any non-affiliate, except as needed to provide our money management tools, or as required or permitted by law. We may use this information to offer you other IBANK products and services that may be beneficial to you. Refer to the money management tools section of the IBank Personal Account Management Terms and Conditions for further details.

## Cookies & Other Technologies

"Cookies" are bits of electronic information that can transfer to your hard drive, mobile device, or other device to keep records of your use or visit to our Digital Services. We may use cookies to improve your experiences when visiting or using our Digital Services. We may use cookies to anonymously track interest in, and collect aggregate information when you use or visit Digital Services. We do not use cookies to store or transmit any Personal information. Temporary "session" cookies are also used to facilitate customer navigation within our Digital Services during their visit. "Session" cookies are deleted once you close your Internet browser. We may also use "persistent" cookies that are retained on your computer after your visit ends so we can identify your preferences and enhance your future visits to our Digital Services.

"Log files" are files that anonymously log actions that have occurred on a website. We may use log files to gather statistics about your browsing habits and to assess overall digital activity, including how many "hits" a particular web page is getting. Log files enable us to track interest in specific promotions, troubleshoot technical concerns, and provide content that may be of interest. We also use the log file entries for our internal marketing and demographic studies, so we can improve the Digital Service we provide to customers and visitors. Log files are used internally only, are anonymous, and are not associated with any particular user, device, computer, or browser.

"Web beacons" are small pieces of data that are embedded in images on the pages of our Digital Services. We also use these technical methods to analyze the traffic patterns on our websites, such as the frequency with which consumers visit various parts of our websites. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. We also use these technical methods in (HTML) emails that we send to you to determine whether the recipients have opened those emails or clicked on links in those emails. The information from these technical methods may be collected in a form that is personally identifiable.

## Behavioral Advertising & Online Tracking

Information about your online activities, combined with other information, may be used to select an advertisement for a product, service, or offer that matches your interests. This advertising practice is called online behavioral advertising (OBA) or interest-based advertising. We allow you to exercise choice regarding the collection of information by third parties about your online activities over time and across third-party websites or online services for interest-based advertising purposes by going to these sites to opt-out: Network Advertising Initiative or Digital Advertising Alliance. Opting out means you will still receive online advertising but the advertising will not be tailored to your online behavior or usage.

In order to develop our other Digital Services you may use, in line with customer needs, we work with third parties to track usage within our Digital Services. These third parties provide us with statistics showing which pages are visited most frequently, how long visitors spend on each page, and other and other anonymous Digital Services information. We use this information to help us plan how to improve these services.

## Third Party Links

Clicking on certain links within our Digital Services may take you to other websites, or may display information on your computer screen or device from other sites, which may not be maintained by IBANK. Such sites may contain terms and conditions, privacy provisions, confidentiality provisions, or other provisions that differ from the terms and conditions applicable to our Digital Service. Links to other Internet services and websites are provided solely for the convenience of users. A link to any service or site is not an endorsement of any kind of the service or site, its content, or its sponsoring organization.

IBANK AND/OR IBANK GROUP MEMBERS ASSUME NO RESPONSIBILITY OR LIABILITY WHATSOEVER FOR THE CONTENT, ACCURACY, RELIABILITY OR OPINIONS EXPRESSED IN A WEBSITE TO WHICH OUR DIGITAL SERVICES ARE LINKED (A "LINKED SITE") AND SUCH LINKED SITES ARE NOT MONITORED, INVESTIGATED, OR CHECKED FOR ACCURACY OR COMPLETENESS BY IBANK. IT IS THE RESPONSIBILITY OF THE USER TO EVALUATE THE ACCURACY, RELIABILITY, TIMELINESS AND COMPLETENESS OF ANY INFORMATION AVAILABLE ON A LINKED SITE. ALL PRODUCTS, SERVICES AND CONTENT OBTAINED FROM A LINKED SITE ARE PROVIDED "AS IS" WITHOUT WARRANTY OF ANY KIND, EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, TITLE, NON-INFRINGEMENT, SECURITY, OR ACCURACY.

## Security

We take our responsibility to protect your information very seriously. We use physical, technical, and procedural safeguards that comply with applicable legal standards to secure your information from unauthorized access and use, alteration, and destruction. Refer to the Security footer link below.

## Social Security Number/Government ID Protection Policy

IBANK, in the normal course of business and as required by law, may collect Social Security numbers to help establish, maintain and service customer accounts. We implement reasonable measures to protect and limit access to these Social Security numbers, as well as prohibit their unlawful disclosure. Social Security numbers are classified as "Restricted" information under the IBANK North America Information Security Risk Policy and IBANK Information Classification Policy. As such, Social Security numbers may be accessed by and disclosed to IBANK team members and others only with a legitimate business "need to know" in accordance with applicable laws and regulations.

## Social Media

IBANK may provide an experience on social media platforms including, but not limited to, Facebook, Twitter, YouTube and LinkedIn that may enable online sharing and collaboration among users who have registered to use them. Please note that when visiting any official IBANK social media site, you are subject to this Online Privacy Statement as well as the social media platform's own terms and conditions. Refer to the IBANK Social Media Terms and Conditions for more information.

## Children's Online Privacy Protection Act

Our Digital Services are not directed to children. We do not knowingly solicit or collect personal information from children under the age 13, without parental consent.

## Updating Your Information

Keeping your account information up-to-date is very important. If you believe that your account information is incomplete or inaccurate, please contact us through our Customer Service page. If you prefer, you may call or write to us at the telephone numbers and addresses provided on your account statements, or you may speak directly with a customer service representative.



## Changes to this Online Privacy Statement

If we make updates to our U.S. online privacy practices, we will update this Statement with the changes and update the "last updated" date posted at the top of the Statement. Any updates to the Statement become effective when we post the updates on this site. Your use of our Digital Services following any update to the Statement means that you accept the updated Statement and consent to the use and sharing provisions identified in the Statement.

## Governing Law

IBANK Digital Services are intended for customers and visitors in the United States. When we process personal data and information and personally identifying information in the United States, we follow United States data protection and privacy regulations.