

Independent Bank Online Privacy and Security Policy

You should know how we collect, protect, use, and share your information.

This Privacy Policy applies when you visit or use the Independent Bank website, use our Online Banking service, use our Mobile Banking service, receive our emails, interact with our advertisements on third-party websites, interact with our social media accounts, or use any other online services we offer that link to or reference this policy (collectively, our "Online Services"), as well as any other policies or disclaimers that apply to the service or application you are accessing (collectively, the "Policies"). The target of our Online Services and marketing efforts is in the United States.

1. Information We Collect

Personal Information

When you visit or use our Online Services, we may collect personal information from or about you. Personal information means personally identifiable information such as your name, email address, mailing address, telephone number(s), account numbers, user name, and password. For example, we may collect this information when you are banking online or applying for a new loan or account.

Other Information

We may also collect certain information that does not reveal your specific identity or does not directly relate to any individual. This may include information you provide such as your date of birth or household income, or aggregated and de-identified data.

We may also collect certain information about your use of our Online Services. For instance, we may collect the IP address of the device you use to connect to the Online Services, information about the site you came from, and information about the parts of our Online Services you access. We and companies we work with may also use cookies, web beacons, and other technologies to collect and store information about your visit to, or use of, our Online Services (for more information on these technologies, see *Cookies and Other Tracking Technologies* below).

In addition, we may associate usage and other information we collect from you with personal information we have about you.

2. How We Use the Information

We use the information we collect from you to provide services, manage our business, offer an enhanced, personalized experience with our Online Services, among other services, products, and use.

The information allows us to (among other things):

- Process applications and transactions;
- Respond to your requests and other communications;
- Verify your identity;
- Prevent fraud and enhance the security of your account;
- Recognize you when you return to our Online Services;

- Provide personalized content;
- Provide more relevant product and service offers on our sites and other advertising;
- Deliver advertising to you directly or on third party websites;
- Perform analytics concerning your use of our Online Services, including your responses to our emails and the pages and advertisements you view;
- Evaluate and improve our business; and
- Comply with and enforce our policies, applicable legal requirements, industry standards, and contractual obligations.

Please see our [Consumer Privacy Policy Notice](#) for information on how personal information may be shared and how you may limit certain types of sharing.

3. **Security**

No method of sending information over the Internet or any method of electronic storage, is completely secure. As such, we **cannot and do not** guarantee the security of your information. You are solely responsible for the privacy policy and security of any information you share with us using our Online Services. We recommend that you **do not** use unsecure channels to communicate sensitive or confidential information (such as your Social Security number, account number, etc.) to us.

We attempt to make our Online Services as secure as possible, so we use industry standard (or better) security measures to protect the sensitive information under our control. This includes limiting access to data and using a variety of information security measures, including encryption technology, such as Transport Layer Security (TLS), to protect your personal sensitive information.

4. **Linking to Third-Party Websites**

We may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link to visit a third-party website, you will be subject to that website's privacy policy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use, security practices, and other policies of the linked third-party website before providing any information on that website.

5. **Cookies and Other Tracking Technologies**

We and the companies we work with use technologies such as cookies, web beacons, and local shared objects to collect and store information about your visit to, or use of, our Online Services.

Cookies

Cookies are small amounts of data sent from a website and stored in a visitor's web browser. Cookies allow us to collect information such as browser type, time spent on our website, pages visited and your relationship with us. We, and companies we work with, may use the information for security purposes, to facilitate navigation, to recognize your device to allow your use of our Online Services, to display information

more effectively, and to personalize your experience with our Online Services. We may collect statistical information about your use of our Online Services in order to improve design and functionality, monitor responses to our advertising and marketing, understand how our Online Services are used, and resolve questions regarding our Online Services. We may also use cookies for advertising purposes.

Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our Online Services. If you decline to accept cookies, we will not be able to recognize your device and you will need to answer a challenge question each time you log on. We may not be able to send you advertising or offers that are relevant to your interests and needs.

Web Beacons

Web beacons are objects embedded in a website or an email or other message that are typically invisible, and allow confirmation that a user has accessed content. We, and companies we work with, may use web beacons or similar technologies to help recognize users of our Online Services, measure the effectiveness of our communications, and for marketing campaigns, to compile statistics about usage and response rates, to personalize your experience with our Online Services, for fraud detection and prevention, for advertising, and to assist with answering questions regarding the use of our Online Services.

Local Shared Objects [Note: May not be applicable]

Local Shared Objects, often referred to as "Flash cookies," are pieces of data websites which use Adobe Flash, may store on a user's computer. We may use Local Shared Objects to recognize you and your device when you come back to our website. Deleting cookies does not delete Local Shared Objects. You can learn more about Local Shared Objects, including how to control and disable them, through the Adobe interface. If you choose to delete Local Shared Objects from our Online Services, your experience with our Online Services may be degraded.

6. Online Advertising

We advertise online, both with our Online Services and on third-party websites. We may collect information using cookies, IP addresses, and the other tracking technologies described in *Cookies and Other Tracking Technologies* above to understand how our advertising is performing, present tailored advertisements to you including prescreened offers of credit and determine whether you might be interested in new products or services. The information we collect may include, for example, the number of page visits, pages viewed on our website, search engine referrals, browsing activities over time and across other websites following your visit to our website, and responses to our advertisements and promotions.

We may utilize Online Behavioral Advertising (OBA), which refers to the practice of collecting information from a computer or device regarding a visitor's web browsing activities across unaffiliated websites over time, in order to deliver advertisements that may be of interest to that visitor based on the visitor's browsing history.

7. **Opting Out of Online Behavioral Advertising (OBA)**

If you prefer that we not use OBA to deliver targeted advertising to you, you can opt out of OBA from certain advertisements on third-party websites in two ways:

- Through the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising. Visit <http://youradchoices.com> and follow the instructions provided there.
- Click on the Advertising Options icon featured on certain of our advertisements on third-party websites. You will see information regarding the uses of the data gathered at the third-party website, and instructions for opting out of data collection and use by certain third parties for the purposes of OBA.

8. **Protecting Children's Privacy Online**

Our Online Services are not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide personal information through our website. We do not knowingly collect information from children under 13 without parental consent. Visit the Federal Trade Commission website for more information about the Children's Online Privacy Protection Act (COPPA).

9. **Making Sure Your Information is Accurate**

It is very important to keep your account information up to date. If your account information is incomplete, inaccurate, or not current, please call our Customer Service at **800.355.0641** or send your request to **Attn: Customer Service, 115 E. Main St., Belding, MI 48809**.

10. **Changes to this Policy**

We may change this Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised Policy on the website, indicating when it was last updated. Any changes to this Policy will become effective when posted unless otherwise indicated.

This Policy was last updated on, and is effective as of **March 7, 2018**.