



Mobile Privacy Statement

Privacy Statement for the FCB Banks Mobile Banking and Card Management Service (Effective as of November 10, 2021)

1. Introduction. This Privacy Policy describes the types of "Personal Information" (information that is identifiable to a particular person) that is collected (directly or through service providers) in connection with the FCB Banks Mobile and Card Management Service downloadable applications ("App") and related services (collectively, the "Service") offered by your financial institution ("we" or "us"). This Privacy Policy is intended to supplement the disclosures in any Privacy Policy that you may have already been presented by us in connection with online banking or other services.

2. Eligibility. The Service is offered only to individual residents of the United States, excluding its territories, who can form legally binding contracts under applicable law. Without limiting the foregoing, the Service is not offered to minors. Other restrictions and eligibility requirements for the Service apply as described in the FCB Banks Mobile Banking and Card Management Service Terms of Use. We do not knowingly collect any Personal Information from or about individuals under 18 years of age. Please do not submit such information to us, and as a parent or legal guardian, please do not allow your children to submit Personal Information without your permission. By using the App or the Service, you represent that you meet these requirements and that you agree to the terms of this Privacy Policy.

3. What Types of Personal Information We May Collect. We may collect Personal Information about you, which may include: name, postal address, zip code, e-mail address, telephone number, account numbers, payment card expiration date, payment card identification or verification numbers, social security number, mobile device location, and other information that we can use to contact you, verify your identity, provide the functionality available through use of the App and the Service, and manage risks, such as information maintained about you by identity verification services and consumer reporting agencies, including credit bureaus, and payment and other transaction information, and history for payments and other transactions in which you participate through the Service, and any Personal Information that you may enter into information blocks present in the App interface or made available through the Service. We may collect information regarding your mobile device such as device settings, unique device identifiers, information about your location, and analytical information that may assist with diagnostics and performance. For your convenience, you may be asked to grant permission for access to your mobile device's geolocation data. This information may be collected when you use certain services that are dependent on your mobile device's location (such as the location of an ATM or in store transactions).

4. How We May Collect Personal Information About You. We may collect Personal Information about you from the following sources:

- a. Information that you input to the App or that the App collects automatically;
- b. Your use of the App and the Service, and your interactions with customer care, including information you enter or speak, and information transmitted by your computer or mobile device or other devices you use as part of your receipt of the Service; and
- c. We may also collect Personal Information about you from others, such as Affiliates, or other companies (such as for fraud detection).

5. How We May Share Personal Information About You. We share Personal Information about you only as permitted by law. For Personal Information that is nonpublic and that we collect in connection with a financial service, U. S. federal law permits us to share such information only for the purposes shown in the following table:

Reasons we can share your personal information about you ³	Does FCB BANKS share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	No	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

6. How We May Use Personal Information About You. We use Personal Information about you only as permitted by law, including but not limited to the following purposes:

- a. To complete transactions and render services authorized by you;

- b. Other everyday business purposes, such as to maintain your ability to access the Service, to send you information about the Service, to effect, administer and enforce transactions, to perform fraud screening, to prevent actual or potential fraud and unauthorized transactions, to verify your identity, to determine your credit history, to verify the information you provide to the Service, to perform collections, to report to credit bureaus (including furnishing delinquent account information), to comply with laws, regulations, court orders and lawful instructions from government agencies, to protect the personal safety of users of the Service or the public, to prevent and defend claims, to resolve disputes, to troubleshoot problems, to enforce our Terms of Use, to protect our rights and property, and to customize, measure, and improve the Service and the App, including pattern recognition, modeling, enhancement and improvement, system analysis, and Service performance analysis;
- c. For marketing purposes - to offer products and services to you, although you may opt-out of receiving commercial email marketing messages from us by following the opt-out processes described in those messages; and
- d. If we are involved in a merger, acquisition, or sale of all or a portion of our assets that results in a change of the majority ownership of the App or the Service or the entity that owns them, you will be notified of this via email and/or a prominent notice on the App, as well as any material change in uses of your Personal Information, as well as any choices you may have regarding Personal Information about you.

7. Other Important Information.

Vermont: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our Affiliates, unless the law allows. We will not share information about your credit worthiness with our Affiliates except with your consent, but we may share information about our transactions or experiences with you with our Affiliates without your consent.

California: Under California law, we will not share information we collect about you with Nonaffiliates, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our Affiliates to the extent required by California law.

8. Definitions.

- a. "Affiliates" means companies related by common ownership or control. They can be financial or nonfinancial companies.
- b. "Nonaffiliates" means companies not related by common ownership or control. They can be financial or nonfinancial companies.
- c. "Joint Marketing" means a formal agreement between nonaffiliated financial companies that together market financial products or services to you.

9. How We Protect Personal Information About You. To protect Personal Information about you from unauthorized access and use, we maintain physical, electronic, and procedural safeguards, including but not limited to security measures that comply with

applicable federal and state laws. We also require our service providers and business partners to whom we disclose the information to do the same. When you enter sensitive information (such as a debit or credit card number) into the App, we encrypt the transmission of that information using Transport Layer Security (TLS) version 1.2 or higher. We may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

10. Data Retention. We will retain, protect, use and share Personal Information about you as long as it is reasonably required for the purposes described in this Privacy Policy, and as required by law, including but not limited to for risk management, regulatory compliance, and audit purposes.

11. Amendments. We may amend this policy at any time by posting a revised version in the App. The revised version will be effective immediately at the time it is posted unless a delayed effective date is expressly stated therein. You may (in our discretion) also be provided with an email notification of such amendments. If we make any change in how we use your Personal Information, we will notify you by email or by means of a notice in the App prior to the change becoming effective. You may (in our discretion) be required to affirmatively acknowledge or accept the revised Privacy Policy in order to continue using the App and the Service. Any use of the App or the Service after a notice of change will constitute your express agreement to such changes.

FCB Banks Privacy Policy

Last Updated: [November 10,2021]

FCB Banks Mobile App (the “App”) – powered by Fiserv – helps you control your credit and/or debit cards through your mobile device, making it easy to manage your finances on the go.

- » The App allows you to:
 - get real-time balances for your accounts
- » manage your money
- » view your transactions and statements
- » make transfers
- » pay your bills and manage billers
- » deposit a check
- » receive alerts
- » manage cards

This Privacy Policy, in combination with other relevant privacy notices that we provide to you (e.g., pursuant to financial privacy laws), inform you of the policies and practices regarding the collection, use and disclosure of any personal information that we and our service providers collect from or about users in connection with the App’s website and mobile application (the “Services”).

THE TYPES OF INFORMATION WE COLLECT IN THE APP

Through your use of the Services, we may collect personal information from you in the following ways:

(a) Personal Information You Provide to Us.

- » We may collect personal information from you, such as your first and last name, address, e-mail, telephone number, and social security number when you create an account.
- » We will collect the financial and transaction information necessary to provide you with the Services, including account numbers, payment card expiration date, payment card identification, verification numbers, and transaction and payment history.
- » If you provide feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.
- » We also collect other types of personal information that you provide voluntarily, such as any information requested by us if you contact us via email regarding support for the Services.

(b) Personal Information Collected from Third Parties. We may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, in order to provide some of our Services.

(c) Personal Information Collected Via Technology. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications and other online services, such as:

- » Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
- » Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- » Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- » Local storage technologies, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- » Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
- » Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, we will

collect your location information when you use the Services; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

HOW WE USE YOUR INFORMATION COLLECTED IN THE APP

(a) General Use. In general, we use your personal information collected through your use of the Services to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. We use your personal information, in connection with the App, in the following ways:

- » facilitate the creation of, and secure and maintain your account;
- » identify you as a legitimate user in our system;
- » provide improved administration of the Services;
- » provide the Services you request;
- » improve the quality of experience when you interact with the Services;
- » send you administrative e-mail notifications, such as security or support and maintenance advisories; and
- » send surveys, offers, and other promotional materials related to the Services.

(b) Compliance and protection. We may use your personal information to:

- » comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
- » protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- » audit our internal processes for compliance with legal and contractual requirements and internal policies;
- » enforce the terms and conditions that govern the Service; and
- » prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

(c) Creation of Non-Identifiable Data. The App may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties in our discretion.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We disclose your personal information collected through your use of the Services as described below.

- a. In Accordance with Our Other Privacy Notices. Other than as described in this Privacy Policy in connection with the App, this Privacy Policy does not apply to the

processing of your information by us or third parties with whom we share information.

- b. Third Party Service Providers. We may share your personal information with third party or affiliated service providers that perform services for or on behalf of us in providing the App, for the purposes described in this Privacy Policy, including: to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the Services; to provide technical support; and/or to provide other services to the App.
- c. Authorities and Others. Regardless of any choices you make regarding your personal information, The App may disclose your personal information to law enforcement, government authorities, and private parties, for the compliance and protection services described above.

LINKS TO OTHER SITES

The App may contain links to third party websites. When you click on a link to any other website or location, you will leave the App and go to another site and another entity may collect personal and/or anonymous information from you. The App's provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites. We encourage you to read the privacy policy of every website you visit.

YOUR CHOICES REGARDING YOUR INFORMATION

You have several choices regarding use of information on the Services.

- a. How We Respond to Do Not Track Signals. Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise its policy on responding to these signals.
- b. Access, Update, or Correct Your Information. You can access, update or correct your information by changing preferences in your account. For additional requests, please contact us.
- c. Opting Out of Email or SMS Communications. If you have signed-up to receive our email marketing communications, you can unsubscribe any time by clicking the "unsubscribe" link included at the bottom of the email or other electronic communication. Alternatively, you can opt out of receiving marketing communications by contacting us at the contact information under "Contact Us" below. If you provide your phone number through the Services, we may send you notifications by SMS, such as provide a fraud alert. You may opt out of SMS communications by unlinking your mobile phone number through the Services.
- d. Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your

mobile device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the App.

SAFEGUARDS AND RETENTION

We implement reasonable administrative, technical and physical measures in an effort to safeguard the information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information.

A NOTE ABOUT CHILDREN

The Services are not directed towards individuals under the age of 18, and we do not, through the App, intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to us through the App and we learn that the personal information is the information of a child under 18, we will attempt to delete the information as soon as possible.

PRIVACY POLICY UPDATES

This Privacy Policy is subject to occasional revision. We will notify you of any material changes in its collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Policy will be effective thirty (30) calendar days following notice of the changes on the Services. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify us prior to the effective date of such changes that you wish to deactivate your account. Continued use of the Services following notice of any such changes shall indicate your acknowledgement of such changes.

CONTACT US

If you have any questions or complaints about this Privacy Policy or The App's data collection or processing practices, or if you want to report any security violations to The App, please contact The App by email at: service@fcbbanks.com; or by mail at:

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