

Privacy Policy

The following privacy policy relates solely to any information collected or received in the course of providing this application and any related services to you. This policy applies to any third party involved in providing the application and related services to you, and such parties are required to agree to maintain the confidentiality of all information collected, maintain adequate safeguards to protect such information, and comply with this privacy policy.

Your bank may collect other information unrelated to the provision of this application in the normal course of its relationship with you. Such information is not subject to this particular privacy policy—a separate privacy policy may apply.

Our Customer Covenant

We pledge to serve every customer with the highest levels of sincerity, fairness, courtesy, respect, and gratitude—delivered with unparalleled responsiveness, expertise, efficiency, and accuracy. We are in business to create lasting relationships, and we treat our customers in the same manner in which we expect to be treated.

We Care About Your Privacy

The principles outlined in our customer covenant are reinforced in our privacy policy, which is our commitment to keep information about you safe and secure. Our most important asset is our customers' trust. Keeping information about you secure and using it only as you would want us to is a top priority for us.

The following key points summarize our privacy policy as it relates to information collected through the use of this application:

1. We have never sold and will never sell information about you to anyone for independent use.
2. We will safeguard any personal information you provide to us, keeping it secure and confidential.
3. We will limit the collection and use of information about you to the minimum required to design and provide you with superior products and services.
4. We will permit only authorized team members who are trained in the proper handling of customer information to have access to information about you.
5. In addition to restricting access to information about you, we also maintain physical, electronic, and procedural safeguards to keep this information private and secure.
6. If support services are provided by an outside organization and access to customer information is required to perform those services, we will require that provider to agree and conform to the privacy requirements outlined in this policy.
7. We are available to provide you information concerning the data we collect from you, where we obtain that information, and how we plan to use it.

Collecting Information

It is important to us that you understand the types of information we collect about you and how it is used. We want you to know that we limit the collection and disclosure of information only to that which we believe is necessary to effectively provide this application and related services and to administer our business.

In the process of serving you, we obtain certain "non-public personal information"—information about you that is not available publicly. For example, that information may include your contact information, credit card account information, banking account information, Social Security Number, date of birth, email address, or other personal information. This information comes to us from a variety of sources, including:

- Information provided by you in connection with the use of our applications.
- Information provided on your behalf by your bank or its credit card processor, including credit card transactions, payment history, and account balances.
- Information we receive from third parties to provide enriched supplemental data concerning transactions processed through our applications.
- Information related to transactions that are processed by us in connection with your use of our applications.
- Information automatically collected by the application through the use of cookies (see below).

Use of Cookies

A “cookie” collects and makes use of user-specific information transmitted by a Web server onto the user's computer so that the information might be available for later access by itself or other servers. Certain information may be automatically obtained through the use of cookies during your user session to verify information and improve application performance and user experience, including:

- User information (first name, last name, account information, email address, and defined preferences).
- Security information to verify the user’s authorization to access the application.
- Certain user profile information concerning the use of the application.

Information Security

Information security is one of our highest priorities. The data processed through the application and each user session is protected by data-encryption technology. Encryption is a procedure for turning plain text or other information into an unrecognizable pattern of data requiring a unique key to open or “decode” the formula. This technology prevents your information from being intercepted while being transmitted over the Internet. We also adhere to strict standards concerning internal and physical security to ensure the safeguarding of your information.

Use of Information

Our limited use or disclosure of the information that we collect from you is described below:

- For identification purposes to protect your accounts and guard against unauthorized access.
- As required to perform the services for which the information was provided.
- As required by law (e.g., responding to subpoenas or similar legal requests, as well as requests from law enforcement agencies or state and federal banking regulators).
- With affiliated or third-party companies involved in the provision of this application and related services, all of which will be governed by the terms of this policy.
- Only in accordance with the principles stated in this policy.

We will comply with applicable state and federal laws that may restrict the types of information we may disclose about you or that require us to provide you with additional notices. We will not sell or provide information about you to telemarketing companies for their independent use.

Please note: Third parties may have access to information related to our customers that is obtained independently from us. Mailings or solicitations based on this information are not within our control.

Inquiries About This Policy

If you have any questions regarding our privacy policies or procedures described above, please contact your banking representative. We will be happy to answer any questions you might have about how we collect, secure, and use your personal information.

This policy is effective as of December 1, 2002. While the basic terms of this policy will remain unchanged, we reserve the right to modify the policy from time to time. Any revised policy statements will be posted through the application and shall apply to all information collected from that point forward.