

## Your Privacy Rights Huntington's Online Privacy Policy

This Online Privacy Policy ("Online Policy") applies to The Huntington National Bank, its parent Huntington Bancshares Incorporated and their subsidiaries and affiliates (collectively described as "Huntington," "we," or "us"), this website and any Huntington website that links to this Online Policy (each a "Site," and collectively "Sites"). This Online Policy specifically applies to Huntington's online collection, use and disclosure of information collected from visitors during use of the Sites, such as for transactional purposes or through online tracking technology, including cookies or action tags. This Site is operated in and controlled from the United States of America. This Online Policy should be read together with the "What Does Huntington Do with Your Personal Information" Privacy Notice ("Privacy Notice") below, which, among other things, describes how Huntington may share personal information gathered from you and how you can opt-out or limit certain types of information sharing.

### Effective Date

The Online Privacy Policy is effective as of July 2015.

### Changes to the Online Policy

We reserve the right to amend the Online Policy at any time to address future developments of Huntington, the Site or changes in industry or legal trends. We will post the revised Online Policy on the Site or announce the change on the Site's homepage. If we make changes to the Online Policy, we will revise the "Effective Date" section above. Any changes to this Online Policy will become effective upon the posting of the revised Online Policy on the Site. By continuing to use the Site following such changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Online Policy, as it may be amended from time to time, in whole or in part, please do not continue using this Site. If you have any questions or comments about the Online Policy, please feel free to contact us at [privacy@huntington.com](mailto:privacy@huntington.com).

### Types of Information Collected

We collect Personal Information and Aggregate Information from visitors to the Site. We use the term "Personal Information" to mean any information that can identify a specific individual. We use the term "Aggregate Information" to refer to any information that does not allow us to identify a specific individual, such as demographic information, areas visited on the Site or what browser was used to access the Site.

### Personal Information

We collect various types of Personal Information from visitors to the Site, such as name, address, email address, phone number, mother's maiden name, Social Security number, date of birth, driver's license, employment, income, residence, and collateral information.

### Aggregate Information

As described in the next section, we may gather and store Aggregate Information about Site visitors. The collection of this Aggregate Information enables us to measure the number of visitors to various portions of the Site, diagnose problems with our Site, administer the Site, and track visitor activity. We will use Aggregate Information to learn more about what you and our customers are expecting from our services to improve the Site. Because Aggregate Information collected on the Site does not personally identify you, we may use Aggregate Information for any purpose whatsoever and share Aggregate Information with third parties for any purpose whatsoever.

### Notice Regarding the Use of Cookies or Similar Technologies

Cookies or other similar technologies may be used to gather information. Cookies are electronic files that your internet browser places on your hard drive to retain information relating to visits to and use of a website. We use cookies to improve the functionality of our Site. We do not use cookies to store or transmit Personal Information. We use cookies to enable our customers to navigate more easily within our Site during an online session. We use "persistent" cookies to allow you to set and maintain your preferences for using our Site. Persistent cookies remain on your computer's memory after you close your internet browser.

We also use 1x1 pixel "action tags," which are types of tracking technology associated with cookies. Action tags help us know how many visitors link to our Site from a third-party website, which areas of our Site visitors use most often, and how much time visitors spend at our Site. We provide this type of Aggregate Information to a nonaffiliated application service provider that compiles statistical information for us. Collection of this data enhances Huntington's ability to meet the needs of online users and make improvements to the online experience.

We engage third party advertising companies to serve ads on Huntington's behalf across the internet. Huntington is not providing, and these companies do not collect, your Personal Information. These companies may use behavioral information obtained from action tags, such as how you navigate websites, to provide Huntington advertisements to you. In addition, we may engage these companies to track and report performance of advertising and marketing campaigns to and from Huntington. These companies may not use your behavioral information for any purpose other than to deliver Huntington ads on the internet.

You can block cookies by changing the settings on your internet browser or through the use of software programs specifically designed to block cookies. Please note, however, that if you choose to block cookies, you will not be able to log into our secure Online Banking service, and you may limit other functionality we can provide when you visit our Site. You can also remove cookies by deleting them from your Temporary Internet or Cookies folder.

#### **Notice Regarding Browser Settings**

Our Site does not recognize Web browser "do not track" signals or other mechanisms. No other party will collect personally identifiable information about your online activities over time and across different Web sites when you use this Web site or service.

#### **Our Use of Personal Information**

Consistent with our Privacy Notice, we use Personal Information provided by Site visitors to fulfill the purpose for which such information was provided, such as to open an account for you, to process a transaction authorized by you, to send you information we think may be of interest to you, to evaluate your suitability for a job if you apply on line through the Careers section of our Site, or as specifically disclosed at the time the information is requested.

We also may remove identifiers from Personal Information or aggregate that information to make it anonymous. We will use such Aggregate Information as described in the section "Aggregate Information."

#### **Disclosure of Personal Information**

We may disclose Personal Information, as permitted by law, and: (1) consistent with our Privacy Notice; (2) to comply with applicable laws; (3) to respond to governmental inquiries or requests; (4) to comply with valid legal process; (5) to protect the rights, privacy, safety or property of Huntington; (6) to permit us to pursue available remedies or limit damages that we may sustain and (7) to enforce our rights resulting from inappropriate use of the Site.

In the event there is a change in the corporate structure of Huntington such as, but not limited to, merger, consolidation, sale, liquidation, or transfer of substantial assets, Huntington may, in its sole discretion, transfer, sell or assign information collected on and through this Site, including without limitation, Personal Information concerning visitors, to one or more affiliated or unaffiliated third parties.

#### **Your Choice About Receiving Promotional E-mails**

Visitors may choose not to receive promotional e-mails or electronic newsletters from us by following the instructions in the specific email from which they wish to opt-out. We will respond to a request made pursuant to this method as promptly as practicable. Even if you elect to stop receiving promotional emails from us, we may still contact you to tell you important information about the Site or us, or in response to a transactional or service related matter.

#### **Maintaining Accuracy in Online Information**

We strive to maintain complete and accurate online information about you and your accounts. If you believe that our online records contain inaccurate or incomplete information about you, please call us toll-free at 1-800-480-BANK (2265) (24 hours a day, seven days a week). Our Online Banking customers may access and edit their own information by logging in to our secure Online Banking service and clicking on the "Customer Service" tab. We will correct any confirmed inaccuracies as necessary and appropriate.

#### **Notice Regarding Children's Information**

We respect the privacy of children and comply with the practices established under the Children's Online Privacy Protection Act. We do not knowingly collect or retain personally identifiable information from children.

#### **Safeguarding Personal Information**

We employ appropriate safeguards to protect Personal Information that you provide to us through our Site. Unfortunately, no method of transmitting or storing data can be guaranteed to be 100% secure. As a result, although we strive to protect Personal Information, we cannot ensure the security of any information you transmit to us through or in connection with the Site. If you have reason to believe that your interaction with us is no longer secure, please notify us of the problem by contacting us at [privacy@huntington.com](mailto:privacy@huntington.com)

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

We may include links in our emails that link you to information on our Web site about our products, services, and special pricing or promotional offers. However, we will never ask you for Personal Information in an email from us (for example, username, password, Social Security number or account number). We will also never include links that take you to a non-secure page where you are asked to provide this information. To determine whether an email that you have received from



Huntington is legitimate, you may contact our Customer Service Center toll-free at 1-800-480-BANK (2265) (24 hours a day, seven days a week).

If you receive an email or other correspondence requesting that you provide any sensitive information via email or to a Web site that does not seem to be affiliated with the Site, or that otherwise seems suspicious to you, please do not provide such information and report such request to us at [idtheft@huntington.com](mailto:idtheft@huntington.com).

**Notice Regarding Web Linking Practices**

We may provide access to information, products or services offered on websites that are owned or operated by other companies ("Third Party Websites"). We provide this access through the use of hyperlinks that automatically move you from a Huntington website to the Third Party Website.

While we do our best to provide you with helpful, trustworthy resources, we cannot endorse, approve or guarantee information, products, services or recommendations provided at any Third Party Website. Because we may not always know when information on a linked site changes, Huntington is not responsible for the content or accuracy of any Third Party Website. Huntington shall not be responsible for any loss or damage of any sort resulting from the use of a link on its websites nor will it be liable for any failure of products or services advertised or provided on any Third Party Website.

Huntington offers links to you on an "as is" basis. When you visit a Third Party Website by using a link on a Huntington site, you will no longer be protected by Huntington's privacy policy or security practices. The data collection, use, and protection practices of the Third Party Website may differ from the practices of Huntington sites. You should familiarize yourself with the privacy policy and security practices of Third Party Websites that you choose to visit. Those are the policies and practices that will apply to your use of the Third Party Website, NOT Huntington's policies and practices.

Products, services, and benefits offered by third parties at Third Party Websites are obligations of those third parties, are not an obligation of, a deposit of, or guaranteed by Huntington or any of its affiliates, and are not FDIC insured.

**Notice Regarding the Use of Online Surveys and Sweepstakes**

Online surveys and sweepstakes are offered from time to time on the Site. Online surveys are used so that we can gather information to better serve you. Based on the information you provide to us, we may inform you of accounts and services from Huntington. You are not required to complete online surveys, sweepstakes or promotions. You should carefully review the rules of each sweepstakes or promotion in which you participate through the Site, as they may contain additional important information about Huntington's use of Personal Information about you. To the extent that the terms and conditions of each sweepstakes or promotion concerning treatment of your Personal Information conflict with this Online Policy, the terms and conditions will control.

**Notice Regarding the Use of Online Planning Tools**

We make planning tools, such as mortgage and savings calculators available. We do not currently store information that you enter into one of these planning tools or calculators.

## FACTS

### WHAT DOES HUNTINGTON DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ Payment history and credit scores</li> <li>▪ Investment experience and insurance claim history</li> </ul>
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Huntington chooses to share; and whether you can limit this sharing.

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

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call toll-free 1-800-537-0861 – our menu will prompt you through your choices.</li> </ul> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
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<b>Questions?</b>	Call toll-free 1-800-480-BANK (2265) or go to <a href="http://huntington.com">huntington.com</a>
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Who we are	
<b>Who is providing this notice?</b>	Huntington companies that are financial service providers, such as banks, mortgage companies, vehicle leasing companies, securities brokers, investment advisors, and insurance agencies.
What we do	
<b>How does Huntington protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Huntington collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Open an account or apply for a loan</li> <li>▪ Make deposits or withdrawals from your account</li> <li>▪ Apply for insurance or seek advice about your investments</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See Page 3 for more on your rights under state law.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply only to you – unless you tell us otherwise.
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with a Huntington name and financial companies, such as banks, mortgage companies, vehicle leasing companies, securities brokers, investment advisors, and insurance agencies.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with can include banks, securities broker-dealers, insurance companies, data processors, software companies, collection agencies, credit bureaus, marketing service providers, and state and federal government agencies.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include financial institutions with whom we have joint marketing agreements, such as insurance companies, mutual fund companies, and motor vehicle dealers.</i></li> </ul>

## Other important information

### State Disclosures

In addition to your rights described below and in this notice, you may have other rights under state laws. We will comply with applicable state laws with respect to our information practices.

Important information for Ohio residents that apply for or obtain an insurance product for personal, family, or household purposes from a Huntington insurance agency –

We may collect personal information from sources other than the persons proposed for insurance coverage (see, for example, the “How does Huntington collect my personal information?” section on Page 2). We may also disclose that information, as well as other personal or privileged information subsequently collected, to third parties outside of Huntington without your authorization to the extent disclosure is permitted by law. Ohio law provides a right to review and correct personal information that Huntington collects about you. To receive a more detailed description of our information practices, please write to us at: Huntington Customer Information Services, Ohio Insurance Information Practices, P.O. Box 1558, CB538, Columbus, Ohio 43216.

California and Vermont Customers have other protections under state law. If your primary mailing address is in California or Vermont, we will not share your credit or financial information that we collect except as permitted by law, including, for example, with your consent or to service your account. We will also not use your information for joint marketing purposes. We do not share customer information with third parties except as permitted by law.

Important information for Nevada residents –

At any time, you may request to be placed on Huntington’s internal do-not-call list by calling us toll-free at 1-800-537-0861. Nevada law requires that we provide you with the following contact information to enable you to obtain further information: (i) Huntington Customer Information Services, Nevada Do-Not-Call Information, P.O. Box 1558, EA4W58, Columbus, Ohio 43216, Phone: 1-800-480-BANK (2265), Email: [privacy@huntington.com](mailto:privacy@huntington.com), and (ii) Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, Nevada 89101, Phone: 1-702-486-3132, Email: [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).

### Affiliates Providing this Notice

- The Huntington National Bank (deposits, loans, trust, credit cards, and other banking services), also using the name Huntington Mortgage Group (mortgage lending)
- Huntington LT (vehicle leasing)
- The Huntington Investment Company (investments)
- Huntington Asset Advisors, Inc. (investment advisory services)
- Huntington Insurance, Inc. (insurance)
- HBI Title Services, Inc. (insurance)

**Additional Information Collection and Use Disclosures**

<p>Your Choice About Promotional Offers</p>	<p>You may call us toll-free at 1-800-537-0861 to tell us your preferences about receiving special pricing or other promotional offers from us. If you do that, however, our ability to tell you about offers that may benefit you and help you save and invest in your future may be limited. Whether or not you make this choice, we will still contact you from time to time about your accounts and provide account mailings to you, such as statements and notices. We may also include special pricing or other promotional offers with such account mailings.</p>
<p>Correcting Errors in Information We Share with Consumer Reporting Agencies</p>	<p><u>If you believe any of the information we share with a consumer reporting agency is in error, please let us know. Write to us at: Huntington Customer Information Services, Consumer Reporting Agencies, P.O. Box 1558, EA4W25, Columbus, Ohio 43216.</u> Please provide us with your complete name, current address, phone number, and Social Security number. You will also need to include your account number, type of account, the specific item in dispute and other supporting documentation or information we reasonably require. You must tell us the reason you believe this information has been reported in error.</p>
<p>Identity Theft</p>	<p>The law provides certain rights to victims of identity theft. If you believe you are a victim of identity theft with respect to any of your accounts or transactions with us, you may notify us at: Huntington Customer Information Services, Identity Theft, P.O. Box 1558, EA3W21, Columbus, Ohio 43216. Please provide as much detail as possible about the accounts or transactions in question, including any dates and account or transaction numbers that apply. We may contact you to discuss additional information necessary to resolve the matter. For more information about our identity theft policies and practices, please visit <a href="http://huntington.com">huntington.com</a> and type "ID Theft" in the search box. There you will find helpful information about how to protect yourself. You will also find additional information on what to do if you believe you are a victim of identity theft.</p>
<p>Important Information About Procedures for Opening a New Account</p>	<p>To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.</p>
<p>For Our Insurance Customers</p>	<p>From time to time, a Huntington insurance agency may review your account and obtain additional quotes on your insurance program to ensure your competitive place in the market. To perform this service, our quoting carriers will utilize certain consumer report information, such as motor vehicle reports, claim history reports, and credit reports. You may request that our insurance agencies not provide this service by emailing <a href="mailto:insurance.compliance@huntington.com">insurance.compliance@huntington.com</a> or by writing to us at: Huntington Insurance, Insurance Opt-Out, P.O. Box 1558, CB538, Columbus, Ohio 43216. Please include your name, address, telephone numbers, the specific policy numbers, and Social Security numbers on your written request.</p>