

Our Online Privacy Code

Effective/Revised Date: July 1, 2015

We value your trust and want to be sure that you understand how we collect, use and share your personal and non-personal information as an individual. This Online Privacy Code (this "Code") applies anytime you visit or use any of the websites, mobile applications and any other online services offered by TD Bank U.S. Holding Company ("TD Bank") or its U.S. affiliates or subsidiaries that link to or reference this Code (collectively, our "online services"). This Code also describes certain information collection, use and sharing practices applicable to emails that we may send you and our advertisements that are displayed through third-party online services.

By visiting or using any of our online services or interacting with one of our advertisements displayed through third-party online services, you accept and consent to the data collection, use and sharing practices described in this Code. If you do not accept and consent to the data collection, use and sharing practices described in this Code, please do not use our online services.

What Information We Collect and How We Use It

Personal Information

When you visit or use our online services, we may collect information that can be directly identified with you, which we refer to in this Code as "personal information." Any information that we collect through our online services, or those offered by third parties, which does not by itself reveal your specific identity or relate directly to you, such as aggregated, de-identified or demographic statistical data, is "non-personal information."

We may collect personal information directly from you through our online services, such as online forms, data entry fields, cookies or mobile applications. Additional personal information from or about you may also be collected and used in other ways, including your communications with us or through reference to information from third party sources. By way of example:

- When you register for an online account or online access to an existing account, we may collect your name, your mailing address, phone number and email address (collectively, your "contact information"), your existing account number (if applicable), Social Security number (SSN) and other information that we believe is reasonably required for ordinary business purposes. We may also collect any of this information when we otherwise communicate with you. We may use your name and contact information to contact you about our services or about marketing offers that may be of interest to you (subject to applicable law and any marketing preferences that we offer and you have registered with us), or to permit you to complete a consumer survey or sweepstakes.
- When you elect to receive electronic disclosures (go paperless) or change your contact preferences, we may ask you to provide additional contact or other information to facilitate these actions.
- When you log into one of our online services, we collect your user ID and password to identify you and permit you access to our online services. If you forget your user ID or need to reset your password, we may ask for your email address, user ID, the last four digits of your SSN and other account information to verify your identity before executing your request.
- When you respond to an online survey question, we may use your answer or any opinions or information that you volunteer to improve our products or services. We may also use your response to develop, publish, share or otherwise disclose statistical or aggregated survey results. Based upon your response, we may provide you with information about products or services that may be of interest to you.
- When you register to make payments through a TD Bank mobile wallet application, we may collect account and payment card numbers and related information that we believe is reasonably required for ordinary business purposes.
- When you visit or use our online services, we may collect information from your computer, or your smartphone, tablet or other mobile device (collectively, "mobile devices"), and associate it with a visitor identifier, or a customer identifier



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that identifies you as our customer. (See **Mobile Applications** and **About Cookies, Tags & Other Tracking Technologies** sections below.)

If you have a financial product or service with us, we will use any personal information that we collect from or about you in accordance with our privacy notice ([What Do the TD Bank Companies Do With Your Personal Information?](#)).

Non-Personal Information

When you visit or use our online services, or those offered by third parties, we and third parties may collect non-personal information from your computer or mobile device. These third parties include our affiliates and non-affiliated third parties that provide services on our behalf, including our non-affiliated advertising partners (collectively, our “service providers”). By way of example:

- When you visit or use our online services, non-personal information may be collected from your computer or mobile device. (See **About Cookies, Tags & Other Tracking Technologies** section below.)
- Non-personal information may be aggregated in our server logs for various purposes, including collection of device event information such as browser crashes, system activity and referral website URL.

We and our service providers may use and disclose non-personal information to other service providers to help us understand how you navigate and which parts of our online services are of most interest to you, provide you the features and functionality of our online services, improve the way that our online services interact with you, and for other purposes described in the **About Cookies, Tags & Other Tracking Technologies** and **Online Marketing** sections below.

Mobile Applications

When you use one of our mobile applications, we and our service providers may collect, use and share personal and non-personal information as described in the sections above. For example, when you use a TD Bank mobile wallet application, we or our service providers share your account and payment card numbers and related information with participating retailers and merchants to facilitate your transaction.

We and our service providers may also collect, use and share other non-personal information from your mobile device for various purposes, such as to enable application functionality.

To enable locator tools within our mobile applications, we and our service providers collect, use and share the location of your mobile device (GPS coordinates), unique device identifier, operating system and settings. The use and sharing of this non-personal information varies by mobile application:

- When you use a TD Bank mobile wallet application, we or our service providers collect and use this information to enable you to locate participating retailers.
- When you use one of our other mobile applications, we or our service providers collect and use this information to enable you to locate our retail stores. If you have a financial product or service with us, we associate this information with an internal identifier that identifies you as our customer. When you request directions through one of these mobile applications, we or our service providers may share this information with third party map applications on your mobile device.

Information Sharing

All financial companies need to share customer information for their everyday business purposes. We may share personal information that we collect about you, and non-personal information that we collect from your computer(s) and mobile device(s), including information relating to your web-browsing activities and other online behavior, for such purposes with:

- Our affiliates (*i.e.*, companies related to us by common ownership or control).
- Our service providers for purposes such as servicing accounts or conducting transactions, surveys, research, marketing, data analysis and enrichment.



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- Other financial institutions that jointly offer, endorse or sponsor financial products or services with us.
- Other individuals or entities, when we believe that disclosure is necessary to report suspicious activities, prevent physical harm, financial loss, or violations of our agreements and policies.
- Regulators and other organizations or individuals who are legally entitled to receive such information.

If you have a financial product or service with us, we will share any personal information that we collect from or about you in accordance with the following notice:

- [What Do the TD Bank Companies Do With Your Personal Information?](#) - How we collect, share and protect your personal information.

About Cookies, Tags & Other Tracking Technologies

We and our service providers may collect non-personal information relating to your visit or use of our online services through various means, such as cookies and tags.

Cookies

A cookie is a small file containing certain pieces of data that is created and stored when you visit a website using a computer or mobile device. When you visit a website, a cookie may be used to track the activities of your browser and also provide you with a more consistent, efficient online experience.

We and our service providers use three common types of cookies: session cookies, persistent cookies and flash cookies:

- Session cookies store information only for the length of time that you are visiting a website; they are not written onto your hard drive. Once you leave the website, they expire and are no longer active.
- Persistent cookies are more permanent and store information on your hard drive. Persistent cookies can be re-read when you return to the website that created them.
- Flash cookies (also called locally shared objects) are data files created when you visit a website, and are most often used to enhance your browsing experience. For more information about flash cookies or to learn how to remove them, please visit helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html.

Session cookies are used on our websites to help determine, among other things:

- What pages you visit and actions you take.
- The address of websites and advertisements that you use to link to one of our websites and that you visit after leaving one of our websites.
- Keywords used for searches that brought you to one of our websites.
- Your browser version, hardware and operating system.
- Your Internet Protocol (IP) address.
- Your internet service provider (ISP) and the region from which you connect to our site.

Session cookies are also used on our websites as a type of digital signature to identify your current session to our website servers.

On secure pages on our websites, session cookies may also be used temporarily to store your account number in order to identify multiple user IDs associated with one account number. Cookies containing account numbers are protected through encryption and are used to enable you to load a new secure page on our websites during the same session without having to enter your password.



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Our websites use persistent cookies to collect information about you, your computer or mobile device and/or your web browser. For example:

- When you visit one of our websites, we may ask you to select your city, state and country of residence. We may store this information in persistent cookies on your computer or mobile device to ensure that appropriate regional information and rates are displayed when you visit the website in the future.
- When you visit one of our websites, we or our service providers associate your browser with a unique visitor identifier.
- When you log into a secure page on one of our websites (as a customer), we or our service providers associate you with an internal identifier that identifies you as our customer. Although this customer identifier allows us or our service providers to know who you are, the cookie will never contain information that would tell a third party who you are, such as your name, address, social security number, account number, telephone number or email address.

Persistent cookies (and visitor identifiers and customer identifiers contained in the cookies) may be used on our websites to:

- Remember your language preferences and city, state and country selection to enable optimization of our websites and a more personalized experience.
- Input your user (log-in) ID automatically, if you choose that option.
- Assist us in authenticating you and your computer or mobile device.
- Analyze products and services you have used to enable optimization of our websites and a more personalized experience.
- Monitor your browsing habits on our websites and deliver online marketing offers and advertisements on our websites that may be of interest to you. (See the **Online Marketing** section below.)
- Contact you with marketing offers that may be of interest to you (subject to applicable law and any marketing preferences that we offer and you have registered with us).
- Collect information about your computer or mobile device, such as location information, so that we can present content specific to your region.

Both session and persistent cookies are used on our websites to:

- Aid in identifying and addressing application support issues and to aid in fraud prevention and investigations.
- Determine how many people visit our websites, and which sections of our websites are visited most frequently. This helps us to understand what type of information is most useful to our website visitors so that we can improve our websites and make them easier for our website visitors to access information.

Some of our websites use cookies and JavaScript associated with analytics services provided by our service providers, including Adobe and Google, to help compile aggregated usage statistics to monitor usage patterns and monitor inbound traffic to our websites. For more information about these analytics services, including any opt out rights offered by Adobe and Google, please visit their websites.

Most browsers automatically accept cookies by default. If you object to the use of session or persistent cookies for tracking or other purposes, it may be possible to block and remove such cookies that you may receive from our websites through the settings in your browser. This process varies depending on your browser and version. To learn more about your browser's options for cookies and online security, please refer to your browser's documentation or online help.

Please be aware that if you buy a new device, change browsers or access one of our websites from a different device, you may need to set your cookie preferences again. Please also note that our websites may not function properly or optimally if you block or delete cookies. For example, you will not be able to access secure pages on our websites that use cookies for layered security, fraud prevention or investigative purposes. (See also discussion of opt out cookies in the **Online Marketing** section below.)



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Tags & Other Tracking Technologies

We and our service providers may also use small images encoded with tags (also known as tags or web beacons) and other tracking technologies through our online services for various purposes, including the following:

- To deliver cookies, to count users who have visited certain pages on our websites, and to help us compile aggregated usage statistics to monitor usage patterns and monitor inbound traffic to our websites.
- In email messages to you or on one of our websites to determine whether you have opened an email message from us, clicked on an embedded website link, acted in response to the email message, or otherwise visited one of our websites.
- To help us or our service providers identify your interests, deliver advertisements tailored to your interests, determine the effectiveness of our online advertising, track what happens after you view or click on one of our advertisements on one of our websites or a third party website and measure how many people respond to our advertisements. (See the **Online Marketing** section below.)
- If we send you an email for marketing purposes, the email may contain one or more weblinks to our website or a third party website operated by one of our service providers. Such weblinks may be encoded with reference information which allows us to identify you online, but will never contain information that would tell a third party who you are, such as your name, address, social security number, account number, telephone number or email address.

Online Marketing

We advertise our products and services through online services offered by us and third parties that are not affiliated with us. Our advertisements may take the form of banner ads, splash ads that appear as you sign on or off, or other formats. Products and services advertised through our online services may include prescreened offers of credit.

We use information about your location, your computer or mobile device, your visits to or use of our online services, your relationship or transactions with us (if you are a customer), and other information described above to present advertisements that may be of interest to you through our online services. We may also use this information to reduce the likelihood that an online offer you have already responded to is presented to you again.

We use service providers to present our advertisements through third party online services. We also use service providers to help determine which advertisements may be of interest to you. Information collected by our service providers through cookies, tags and other technologies includes the number of people who look at websites and advertisements, the sources of online referrals, website browsing patterns, and responses to our advertisements and promotions.

Interest-based Advertising

Some of our advertisements displayed through third party online services use behavioral targeting or retargeting technology (interest-based advertising). If you click on one of these advertisements, a cookie or tag may be stored on your computer or device and later used to display tailored advertisements for our products or services.

Opt-out Options

We do not respond to “do not track” signals transmitted by web browsers or similar mechanisms. However, you may opt out of the use of non-personal information in interest-based advertising of our products or services displayed on third party websites by us, and our service providers.

When one of our advertisements is displayed on a third party website through interest-based advertising, an AdChoices (also known as Advertising Option) icon is also displayed on that website. To opt out of the use of non-personal information in interest-based advertising of our products or services on third party websites, click the AdChoices icon and follow the instructions. If you choose to opt out of interest-based advertising, a cookie will be placed on your browser indicating your opt out decision.



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Please keep the following things in mind as you consider whether to opt out of interest-based advertising:

- Your opt out decision is only stored in a cookie in the browser that you are using when you opt out, so you should separately set your preferences for other browsers on other computers or devices that you may use.
- Blocking or deleting cookies in your browser may block or remove your opt out preferences.
- Even if you opt out, you may still receive advertisements for our products or services through websites or other online services offered by us or third parties. However, these advertisements will no longer be customized based upon your web browsing activities on third party websites.
- We and our service providers may still collect non-personal information relating to your web-browsing activities and other online behavior for other purposes, including web analytics.
- The AdChoices icon is part of the cross-industry Self-Regulatory Program for Online Behavioral Advertising, which is managed by the Digital Advertising Alliance. For more information on this program, go to www.aboutads.info.

Third-Party Sites and Services

Our online services may contain links to third-party websites and other online services, which are not governed by this Code. As such, we encourage you to learn about the privacy and security practices of those third parties. We are not responsible for the privacy or security of such websites and other online services, nor the online collection, use or sharing of personal or non-personal information by third parties.

Online Authentication

When you obtain one of our products or services online, or register for or use one of our online services, you may be required to perform an online authentication process. Some of these processes utilize third party information services to verify your identity. For example, you may be asked to confirm details about a previous financial transaction (e.g., the amount of your monthly payment to a third party). The information that you provide in response to such questions will be used for the sole purpose of verifying your identity, and will not affect your credit rating or credit file. Our online authentication processes may collect a unique device identifier, IP address, and related data associated with your mobile device, and/or use cookies, tags and JavaScript, to identify the computer or mobile device or browser that you are using to access our site. These processes are used to protect both you and us from fraud and unauthorized transactions.

Accuracy of Your Information

The accuracy of your account and other personal information is important. If you have a financial product or service with us and you find that any personal information we have or have reported to another party does not appear to be accurate, please contact us as follows:

TD Bank Operations Center
P.O. Box 219
Lewiston, ME 04243-0219

Please include your account number, if available.

Social Media

TD Bank participates in social media platforms, such as Facebook®, Twitter® and LinkedIn®, which enable online sharing and collaboration among their users. Any information or other content you post on these platforms, such as pictures, opinions or personal information, is subject to the platforms' terms of use and privacy and security policies; please refer to their policies to better understand your rights and obligations with regard to such content.

Protecting Children's Online Privacy

In accordance with the Children's Online Privacy Protection Act, we do not knowingly collect personal information from children (*i.e.*, persons under age 13). We do not knowingly collect, store, use or share personal information about children, unless the information has been provided by an adult in connection with the opening of a deposit account for or with the child. We do not accept applications directly from children, and will not send unsolicited promotions to users who indicate they are less than 13 years of age except in connection with an account opened by an adult. This does not



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prevent parents from opening deposit accounts on behalf of their children. We will obtain parental consent prior to the creation of an account on behalf of a child.

Visitors Residing Outside the United States

If you visit or use our online services, your personal and non-personal information may be collected, stored, used and processed in and transferred to, from and within the United States. In such instances, applicable U.S. federal and state laws shall govern. If you are a non-U.S. resident, such laws may not provide the same level of protection as the laws of the country of your residence.

Changes to Our Online Privacy Code

We reserve the right to update this Code from time to time to comply with applicable laws and to reflect changes in our online services. For this reason, we encourage you to periodically review this Code. If we make changes to this Code, we will revise the "Effective/Revised" date shown at the top of the Code and post the revised Code on www.tdbank.com and through our other online services. The changes will become effective when we post the revised Code. Your visit or use of any of our websites or other online services following such posting means that you accept the revised Code.

Contact

If you have any questions or comments on our Online Privacy Code, please contact us at:

TD Bank
Attention: Chief Privacy Officer
P.O. Box 9540
Portland, ME 04112-9540



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