

## **FTB MOBILE AND FTB BIZ PRIVACY NOTICE**

FTB Mobile and FTB Biz provide services to users on behalf of FirstTier Bank as a service provider. This Privacy Notice, in combination with relevant privacy notices that FirstTier Bank provides to you (e.g., pursuant to financial privacy laws), informs you of the policies and practices regarding the collection, use and disclosure of any personal information that FTB Mobile and FTB Biz collects from or about users in connection with the use of these mobile applications (the “Services”). You can find more information about FirstTier Bank’s privacy policies on FirstTier Bank’s website or by contacting your local branch.

FTB Mobile and FTB Biz may allow you to:

- get real-time balances for your accounts
- manage your money
- view your transactions and statements
- make transfers
- pay other people
- deposit a check
- locate branches and ATMs
- receive alerts

### **THE TYPES OF INFORMATION FTB MOBILE AND FTB BIZ COLLECTS**

FTB Mobile and FTB Biz may collect personal information from you in the following ways:

(a) Personal Information you provide to us.

FTB Mobile and FTB Biz may collect personal information from you, such as your first and last name, address, e-mail, User IDs, telephone number, and social security number when you open a new financial account or register for other financial services. Device images/videos may be accessed when you deposit a check or use a QR code to make peer to peer payments using Zelle or other payments functionality. Device contacts may be accessed when you make peer to peer payments using Zelle or other payments functionality. Device location may be accessed to detect and prevent card transaction fraud and to provide branch and ATM locations.

FTB Mobile and FTB Biz may 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.

(b) Personal Information Collected from Third Parties.

FTB Mobile and FTB Biz 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., Wi-Fi, 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 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 an 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, FTB Mobile and FTB Biz will collect your location information when you use these applications; for example, to provide our fraud detection services. If you do not want FTB Mobile and FTB Biz to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

## **HOW FTB MOBILE AND FTB BIZ USE YOUR INFORMATION**

(a) General Use.

In general, FTB Mobile and FTB Biz use your personal information to respond to your requests as submitted through the applications, to provide you with the services you request, and to help serve you better. FTB Mobile and FTB Biz use your personal information in the following ways:

- facilitate the creation of, secure and maintain your account;

- identify you as a legitimate user in FTB Mobile and FTB Biz system;
- provide improved administration of the applications;
- provide the services you request;
- improve the quality of experience when you interact with the applications;
- send surveys, offers, and other promotional materials related to bank 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 bank services; and
- prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.

(d) Creation of Non-Identifiable Data.

FTB Mobile and FTB Biz 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. FTB Mobile and FTB Biz may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance FTB Mobile and FTB Biz products and services. FTB Mobile and FTB Biz reserves the right to use and disclose non-identifiable information to third parties in its discretion.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

FTB Mobile and FTB Biz discloses your personal information as described below.

(a) At our discretion, FTB Mobile and FTB Biz may share your information within the institution or with third parties. Other than as described in this Privacy Notice in connection with the Services, this Privacy Notice does not apply to the processing of your information by FirstTier Bank or third parties with whom FTB Mobile and FTB Biz shares information at the Bank's discretion.

(b) Third Party Service Providers.

FTB Mobile and FTB Biz may share your personal information with third party or affiliated service providers that perform services for or on behalf of FTB Mobile and FTB Biz, for the purposes described in this Privacy Notice, 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 FTB Mobile and FTB Biz.

(c) Corporate Restructuring.

FTB Mobile and FTB Biz may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction involving the sale, transfer, divestiture, or disclosure of all or a portion of FTB Mobile and FTB Biz business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If FTB Mobile and FTB Biz company, business or assets is acquired by another company, that company will possess the personal information collected by FTB Mobile and FTB Biz and the company will assume the rights and obligations regarding your personal information as described in this Privacy Notice.

(d) Authorities and Others.

Regardless of any choices you make regarding your personal information, FTB Mobile and FTB Biz 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 Services may contain links to third party websites. When you click on a link to any other website or location, you will leave the Services and go to another site and another entity may collect personal and/or anonymous information from you. FTB Mobile and FTB Biz provision of a link to any other website or location is for your convenience and does not signify FTB Mobile and FTB Biz endorsement of such other website or location or its contents. FTB Mobile and FTB Biz 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 Notice do not apply to these outside websites. We encourage you to read the Privacy Notice of every website you visit.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

You have several choices regarding the 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. FTB Mobile and FTB Biz currently do not act in response to these signals. If and when a standard is established, FTB Mobile and FTB Biz may revise their 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. To do so, you should contact FirstTier Bank. For additional requests, please contact your local branch on whose behalf we are providing the Services to you.

(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, FTB Mobile and FTB Biz may send you notifications by SMS, such as providing 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 could 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 FTB Mobile and FTB Biz collection of location information, you may no longer be able to use some features of the Services.

## **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.

Federal laws and regulations require that US financial institutions retain original, active, and historical records. Your personal and financial data will be retained for a period of five to ten years, depending on applicable laws, regulations, and legitimate business needs.

## **A NOTE ABOUT CHILDREN**

The Services are not directed towards individuals under the age of 18, and FTB Mobile and FTB Biz does not intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to FTB Mobile and FTB Biz and then learns that the personal information is the information of a child under 18, FTB Mobile and FTB Biz will attempt to delete the information as soon as possible.

## **PRIVACY NOTICE UPDATES**

This Privacy Notice is subject to occasional revision. FirstTier Bank may notify you, in our sole discretion, of any material changes in FTB Mobile and FTB Biz collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Notice will be effective thirty (30) calendar days following notice of the changes to the Services or immediately where no notice is given. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify FTB Mobile and FTB Biz 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 (or use of the Services after any such changes) shall indicate your acknowledgement of such changes.

## **CONTACT US**

If you have any questions or complaints about this Privacy Notice or FTB Mobile and FTB Biz data collection or processing practices, or if you want to report any security violations to FirsTier Bank, please contact us by email at: [information@firstierbanks.com](mailto:information@firstierbanks.com); by calling your local branch; or by mail at:

FirsTier Bank

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