

## HMBRADLEY, INC. PRIVACY POLICY

This Privacy Policy explains how HMBradley, Inc. (HMBradley) collects, shares, uses, and protects information when you visit or use HMBradley's online services offered by that link to or reference this policy (collectively, our "online services"). This policy covers HMBradley's online services, including the HMBradley websites, HMBradley Mobile, and HMBradley-branded social media sites or pages, as well as any interactions you may have while viewing content provided through one of HMBradley's digital advertising campaigns.

When you review this Privacy Policy, please understand:

- If you visit or use one of our online services, we or one of our authorized service providers, may transfer your information within the United States or outside the United States.
- Our financial products and services are not intended for children under 13.
- If you have an account through us with a depository financial institution, we will provide you with a privacy notice for that depository financial institution at the time such account is applied for or opened.
- If you use our social media sites or pages, please do not share any non-public personal information about you or your family that you provided to us.

### Information We Collect

Personal Information. When you visit or use our online services, we may collect personal information from or about you such as your name, email address, mailing address, telephone number(s), account numbers, limited location information (for example, a zip code to help you find a nearby ATM), user name and password. We may also collect payment card information, social security numbers, driver's license and government issued identification numbers when you provide such information while using our online services and where we believe it is reasonably required for ordinary business purposes.

Usage and Other Information. We also may collect certain information about your use of our online services. For example, we may capture the internet protocol address of the devices you use to connect to the online service, the type of operating system and browser you use, information about the site you came from, the parts of our online service you access, and the site you visit next. We or our third-party service providers may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. We may associate the usage and other information we collect online with personal information about you.

HMBradley Mobile. HMBradley allows you to access some of our products and services through mobile applications and mobile-optimized websites ("HMBradley Mobile"). When you interact with us through HMBradley Mobile, we may collect information, including unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device. We may ask your permission before collecting certain information (such as precise global-positioning information) through HMBradley Mobile.

Additional Sources of Information. We also may collect information about you from additional online and offline sources, including from co-branded partner sites or commercially available third-party sources, such as credit reporting agencies. We may combine this information with the personal and other information we have collected about you under this Privacy Policy.

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Use of Information. We use the information we collect from you to:

- Process applications and transactions for deposit, loan, and other financial services and products;
- Verify your identity (such as when you access your account information);
- Prevent fraud and improve the security of your account or our online services;
- Communicate with you;
- Manage your preferences;
- Perform analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view;
- Provide customized content and marketing messages;
- Operate, evaluate and improve our business;
- Comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies; and
- For any other purposes that we may specifically disclose at the time you provide it or we collect your information.

We may also use data that we collect on an anonymous basis (such that it does not identify any individual customers) for our business purposes, where permissible under applicable laws and regulations.

Disclosure of Information. If you have an account through us with a depository financial institution, we will limit sharing of your information in accordance with the choices you will have provided us in response to the appropriate Privacy Notice delivered to you when applying for or opening the account. We may share the information we collect from and about you with other third parties. For example, we may share your information with:

- HMBradley third-party service providers;
- HMBradley affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations;
- Other companies to bring you co-branded services, products or programs;
- Third parties or affiliates for a corporate transaction, such as a sale, consolidation or merger of HMBradley businesses; and
- Other third parties to comply with legal requirements, including demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

We may share anonymous or aggregated information with third parties to help deliver products, services, and content that are tailored to the users of our online services and for other purposes.

Understanding Cookies, Web Beacons and Other Tracking Technologies. We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services. “Cookies” are small amounts of data a website can send to a visitor’s web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services or will make it impossible for you to use our online services.

We may use GIFs, pixel tags or web beacons (usually one-pixel, transparent images located on a webpage or in an email) to send you advertisements or to help us recognize users, assess traffic patterns and measure site or marketing campaign engagement. We may use Local Shared Objects, sometimes referred to as “flash cookies”, that

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may be stored on your hard drive using a media player or other software installed on your device to improve your online experience in a manner similar to cookies in terms of their operation. However, flash cookies may not be managed in your browser in the same way.

Online Advertising. You will see advertisements when you use many of our online services. These advertisements may be for our own products or services (including pre-screened offers of credit) or for products and services offered by third parties. The advertisements you see may be determined using the information we or our service providers and other companies that we work with have about you, including information about your relationships with us and how you transact with us. Where permitted by applicable law, we may share with others the information we collect from and about you.

Linking to Third-Party Websites. HMBradley may provide links to websites that are owned or operated by other companies (third-party websites). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Security. We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Unencrypted Information You Send Us. You may sometimes send to us information electronically that may not be securely transmitted. We recommend that you encrypt information when you send or communicate sensitive or confidential information, including your Social Security number, date of birth, and account number, to us. HMBradley will provide a secure Message Center that is available for your use to send us confidential information when you sign into our website or mobile application.

Updating Your Information. You should review and, as appropriate, update certain profile information by logging in and accessing the "Customer Service" section.

Changes to this Privacy Policy. We may change this Privacy Policy from time to time and we will let you know by posting the revised policy on the Privacy Policy page of the HMBradley websites with a new "Last Revised" date. Changes to this Privacy Policy will become effective when posted unless indicated otherwise.