



ONLINE PRIVACY

Last updated July 1, 2020

BAC Community Bank (the Bank) is committed to safeguarding the privacy and security of your information through the Bank's online services. To protect your information, we have security measures in place to help keep your online transactions confidential and secure.

PRIVACY STATEMENT

This Online Privacy Notice (the "Notice") describes how information is collected by and through the Bank's online interfaces such as our website, online banking and mobile applications (the "Services"), and how that information may be used and shared. By accessing or using any of the Services, you confirm your consent and agreement to the terms of this Notice as may be in effect at that time.

California residents also should refer to our California Consumer Privacy Act Disclosure. In the event of a conflict between the terms of this Notice and the terms of the California Consumer Privacy Act Disclosure, the terms of the California Consumer Privacy Act Disclosure will govern and control as to California residents.

INFORMATION WE COLLECT THROUGH THE SERVICES

We collect two basic types of information through the Services, personal information and anonymous information. We also collect location information in connection with our mobile applications.

Personal information refers to information that identifies an individual such as information you may complete on our forms, applications or similar fields. This would include your name, address, email address, telephone number, etc.

Anonymous information refers to information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples may include an IP address, website browsing history, demographic information that you provide to us (e.g., your household income) and aggregated or de-identified data.

Location information refers to information that may be collected when you request certain services through our mobile applications that are dependent on your physical location.

HOW WE COLLECT, USE AND SHARE INFORMATION WE COLLECT

We collect personal information from you or about you when you provide this information to us directly. For example, we may obtain personal information when you request information, products or services from us, register on the website or an application, respond to surveys, contact customer support or otherwise interact with us. We may also receive information about you from other online and offline sources, such as public databases, social media platforms and other third parties.

In addition, we may collect information about your activity on the Services automatically using tracking technologies, such as cookies and pixel tags. Definitions for the tracking technologies we use are available in the Online Tracking Technologies section of this Notice.

If you submit any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Notice.



We may use information that we collect in order to, among other things:

- Communicate with you about your accounts or transactions with us
- Verify your identity and/or location (or the identity or location of your authorized representative) for security, fraud prevention and other risk control purposes
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Send you important information regarding the Services, changes to this Notice and/or other similar administrative information
- Comply with our legal and regulatory obligations
- Enforce our terms and conditions and otherwise protect our rights and operations
- Optimize or improve our products and services
- Provide you with, or evaluate your eligibility for, products and services that you request from us
- Allow you to participate in surveys, sweepstakes, contests and similar promotions, and to administer such promotions (note that these promotions may contain additional disclosures regarding our collection and/or use of your information)
- Send you offers and promotions for our products and services, or products and services that may be of interest to you
- Personalize content and experiences on the Services
- Provide you with advertising based on your activity on the Services and on third-party websites and applications. For additional information regarding our use of your information for personalization and tracking, please refer to the Online Tracking Technologies and Online Behavioral Advertising section of this Notice.

Our use of information that we collect will be consistent with applicable federal and state law, required disclosures, and choices and controls that may be available to you.

DATA SECURITY

The Bank uses commercially reasonable administrative, technical, and physical security measures to protect personal information collected through the Services. In the event we share information with third party service providers or joint marketers, we restrict the ability of such parties to use or disclose the information we furnish. We also require such parties to apply appropriate security measures to protect information. We retain your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Notice or at the time of collection; or (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements.

Unfortunately, no security measure can be guaranteed to be absolutely secure, and we disclaim any representation or warranty that our commercially reasonable administrative, technical, and physical security measures or those of our service providers and joint marketers are invulnerable to breach or compromise.

ONLINE 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 the Services.

This website uses pixel tags, otherwise known as web beacons, to set, read, and/or modify targeting cookies. Pixel tags may be used to obtain information about the computer accessing the website, such as an IP address, the time the pixel tag is sent, the computer operating system and browser type, and information similar to the foregoing. We use the information collected by pixel tags to deliver more targeted advertising, enhancing the advertising experience for each website user.



“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 the 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 using the Services.

Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way.

OTHER WEB SITES

For your convenience, our website may contain links to other websites, or may refer you to other websites. Those other sites may be operated by other third-party companies not affiliated with us. Once you leave the Bank’s website and access another website, you should be aware that you are subject to the privacy and security policies of that other website.

EXTERNAL AGGREGATION SERVICES

You have the responsibility to help us protect your accounts. Consider the risk of revealing your user name, password, or other credentials to any person or third party. By providing your user name, password or other credentials to any person or third party (including an aggregation service) you authorize that person or third party to initiate transfers to or from your account.

Some third-party companies offer aggregation services that allow you to consolidate your financial account information from a variety of sources, so that you can view all your account information at a single online location. For example, an aggregation service might collect and consolidate your checking and savings account balances at your bank, the value of your stocks and bonds in your brokerage account and your frequent flier mileage information from an airline. In order to do so, the aggregator may request access to personal information including identification information, account information, personal IDs and passwords from you for each individual website. You must provide your permission and access to your personal information to allow these services to collect this data.

Please use caution when providing personal information to aggregation services. You should always ensure that the aggregator has appropriate policies and practices in place to protect the privacy and security of any personal information to which the company is gaining access.

BAC Community Bank is not responsible for the use or disclosure of any personal information accessed by a company or an individual to whom you provide the personal ID and password required to access your accounts through the Services.

If you do elect to provide your personal ID, password or other information about your accounts with us to an aggregation service, you will be unable to contest the validity of any transaction initiated by the aggregator, whether or not you were aware of the specific transaction. Should you decide to revoke the authority you have given to an aggregation service, you may contact us at your local branch, or call 1-877-226-5820 in which case we may need to block your account until we issue new access codes.

SOCIAL MEDIA PLATFORMS

BAC Community Bank may interact with registered users of various social media platforms, including Facebook® and Instagram®. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile or posts), is subject to the applicable social media platform’s terms of use and privacy



policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content. Please do not post confidential personally identifiable information such as first name, last name, social security number(s), mother's maiden name and account number(s) or passwords. Criminals can use this information to steal your identity, open fraudulent credit accounts and loans in your name, or access your existing accounts.

ONLINE BEHAVIORAL ADVERTISING

We may use personal information in connection with our online advertising activity. Online advertisements may be in the form of banner ads, splash ads, or other formats. These advertisements may appear on our sites, and we may contract with third party advertising companies to promote our products and services and serve related advertisements on websites and mobile applications that are owned or operated by parties not affiliated with us.

In order to better understand which of our products and services may be of interest to you and to tell you about those products and services, we may from time to time collect information about your online activities over time and across third party websites and online services. We also may engage third party service providers to collect information about your online activities over time and across third party websites and online services when you use our Services. Serving advertisements based on a person's online activities over time and across third party websites and online services is generally known as "online behavioral advertising."

CHILDREN'S ONLINE PRIVACY

Our website is not intended for children under the age of 13. Please do not access or use this site if you are under 13 years of age. By using this site, you affirm that you are over the age of 13. For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: <http://www.ftc.gov/>.

UPDATING INFORMATION

If you wish to update or have any concerns regarding your information, please use the [Contact Us](#) option on our website, or call or write to us using the following contact information:

- Call Customer Service at 877-226-5820
- Write to us at BAC Community Bank, Customer Service Department
P.O. Box 1140, Stockton, CA 95201-1140

CHANGES

We may add to, delete from, or otherwise amend and update this Online Privacy information from time to time without prior notice. When we amend our Online Privacy information we will post a notice on our website directing users to review the updated information.