

# Online Privacy Disclosure

The Tradition Capital Bank Digital Banking Platform (the “Platform”) helps you manage your financial resources through desktop and mobile access.

The Platform allows you to:

- Get real-time balances for your accounts
- Manage your money
- View your transactions and statements
- Make transfers
- Pay your bills and manage billers
- Deposit a check
- Receive alerts
- Manage card

This Privacy Disclosure, in combination with other relevant privacy notices that we provide, is to inform you of the policies and practices regarding the collection, use and disclosure of any personal information that we and our service providers collect from or about users in connection with the Bank’s website and the Platform (the “Services”).

## THE TYPES OF INFORMATION WE COLLECT IN THE SERVICES

Through your use of the Services, we may collect personal information from you in the following ways:

### (a) **Personal Information You Provide to Us**

- We may collect personal information from you, such as your first and last name, address, email, telephone number, and social security number when you create an account.
- We will 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.
- If you provide feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, to send you a reply. We also collect other types of personal information that you provide voluntarily, such as any information requested by us if you contact us via email regarding support for the Services.

**(b) Personal Information Collected from Third Parties**—We may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, 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 or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (example: phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (example: Wi-Fi, LTE, 5G), 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 and Flash, which 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 a webpage or 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, we will collect your location information when you use the Services; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

## HOW WE USE YOUR INFORMATION COLLECTED IN THE SERVICES

**(a) General Use**—In general, we use your personal information collected through your use of the Services to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. We use your personal information, in connection with the Services, in the following ways:

- Facilitate the creation of, and secure and maintain your account
- Identify you as a legitimate user in our system
- Provide improved administration of the Services
- Provide the Services you request
- Improve the quality of experience when you interact with the Services
- Send you administrative email notifications, such as security or support and maintenance advisories
- Send surveys, offers, and other promotional materials related to the 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 the Service
- Prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft

(c) **Creation of Non-Identifiable Data**—The Platform 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. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties in our discretion.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

We disclose your personal information collected through your use of the Services as described below.

(a) **In Accordance with Our Other Privacy Notices**—Other than as described in this Privacy Disclosure in connection with the Platform, this Privacy Disclosure does not apply to the processing of your information by us or third parties with whom we share information.

(b) **Third Party Service Providers**—We may share your personal information with third party or affiliated service providers that perform services for or on behalf of us in providing the Platform, for the purposes described in this Privacy Disclosure, 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 the Platform.

(c) **Authorities and Others**—Regardless of any choices you make regarding your personal information, the Platform 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 Platform may contain links to third party websites. When you click on a link to any other website or location, you will leave the Platform and go to another site, and another entity may collect personal and/or anonymous information from you. The Platform's provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. We 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 Disclosure do not apply to these outside websites. We encourage you to read the Privacy Disclosure of every website you visit.

## YOUR CHOICES REGARDING YOUR INFORMATION

You have several choices regarding 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. We currently do not act in response to these signals. If and when a standard is established, we may revise the 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. For additional requests, please contact us.

(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, we may send you notifications by SMS, such as provide 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 can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, if you withdraw consent to our collection of location information, you may no longer be able to use some features of the Platform.

## 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.

## A NOTE ABOUT CHILDREN

The Services are not directed towards individuals under the age of 18, and we do not, through the Platform, intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to us through the Platform and we learn that the personal information is the information of a child under 18, we will attempt to delete the information as soon as possible.

## PRIVACY DISCLOSURE UPDATES

This Privacy Disclosure is subject to occasional revision. We will notify you of any material changes in its collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Disclosure will be effective thirty (30) calendar days following notice of the changes on the Services. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify us 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 shall indicate your acknowledgement of such changes.

## CONTACT US

If you have any questions or complaints about this Privacy Disclosure or the Tradition Capital Bank Platform's data collection or processing practices, or if you want to report any security violations to the Tradition Capital Bank Platform, please contact us by email at: [mybanker@tradition.bank](mailto:mybanker@tradition.bank); or by mail at: 7601 France Ave S, Ste 140, Edina, MN 55435.

## CALIFORNIA PRIVACY NOTICE

This California Privacy Notice ("Notice") is provided pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 (CPRA). This Notice supplements Tradition Capital Bank's Privacy Disclosure and applies solely to residents of the state of California ("consumers" or "you").

"Personal Information" is information that identifies, relates to, or could reasonably be linked, directly or indirectly, with a particular California resident. Personal Information under the CCPA does not include:

- (a) publicly available information from government records;
- (b) de-identified or aggregated consumer information; or
- (c) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act and the personal information collected that is subject to the Gramm-Leach-Bliley Act.

### **Collection and Disclosure of Personal Information**

In the past 12 months, we have collected, and may have disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

- Identifiers, such as name and government-issued identifier including social security number.
- Personal information, as defined in California Customer Records law, such as contact information and financial information.
- Characteristics of protected classifications under California or federal law, such as sex and marital status.
- Commercial information, such as transaction information and purchase history.
- Internet or network activity information, such as browsing history and interactions with our website.
- Geolocation data, such as device location and Internet Protocol (IP) location.
- Audio, electronic, visual, and similar information, such as call recordings.
- Professional or employment-related information, such as work history and prior employers.
- Biometric Information, such as facial recognition and fingerprint identification used in mobile Platforms.

The categories of sources from whom we may have collected this Personal Information are:

- Directly from a California resident or the individual's representatives.
- Service providers and other third parties.
- Public record sources.
- Information from our affiliates.
- Website and mobile Platform activity.
- Information from client directed third parties or institutions representing a client.

We disclose your Personal Information for business purposes to the following categories of third parties:

- Affiliates of Tradition Capital Bank.
- Vendors and service providers.
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.
- Government agencies, as required by laws and regulations.

We may not collect all the examples of data listed in the categories listed above. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We do not knowingly collect or sell Personal Information of individuals under 16 years of age.

### **Use of Personal Information**

Tradition Capital Bank may use or disclose Personal Information we collect about California residents covered by this Notice for the following purposes:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing loans, providing deposit account services, or providing similar services.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity and prosecuting those responsible for that activity.
- Undertaking activities to verify or maintain the quality or safety of a service and to improve, upgrade, or enhance that service.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Complying with laws and regulations and complying with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes, or opinions).

### **Sale of Personal Information**

In the past 12 months, we have not sold any Personal Information.

### **Retention of Personal Information**

We retain Personal Information as required by law or regulation and for as long as necessary to fulfill the purposes described above.

### **Rights under the CCPA**

If you are a California resident, you have the right to:

- Request we disclose to you, free of charge, the following information covering the 12 months preceding your request:
  - the categories of Personal Information about you that we collected;
  - the categories of sources from which the Personal Information was collected;
  - the purpose for collecting Personal Information about you;
  - the categories of third parties to whom we disclosed Personal Information about you;

- the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
  - the specific pieces of Personal Information we collected about you.
- Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
- Be free from unlawful discrimination for exercising your rights under the CCPA

We will acknowledge receipt of your request and advise you how long we expect it will take to respond to your request if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

There may be instances when we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

If we are not able to honor your request, we will advise you in our response to you. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days to process your request, we will provide you with an explanation for the delay.

### **Exercising Your Rights**

You can submit requests via:

Phone: (952) 806-6600

Email: [mybanker@tradition.bank](mailto:mybanker@tradition.bank)

You may be asked to verify your identity before we can fulfill your request. Authorized agents may also submit requests on your behalf.

### **Changes to This Policy**

We may change or update this Notice from time to time. When we do, we will post the revised Notice on this page with a new Effective Date.

**FACTS****WHAT DOES TRADITION CAPITAL BANK  
DO WITH YOUR PERSONAL INFORMATION?****Why?**

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.

**What?**

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and payment history
- credit history and credit scores

When you are *no longer* our customer, we continue to share your information as described in this notice.

**How?**

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 Tradition Capital Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Tradition Capital Bank 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	No	We don't share
<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	No	We don't share
<b>For our affiliates' everyday business purposes</b> —information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

**Questions?**

Call 952-806-6600 TOLL FREE 1-888-993-4296 or go to [www.tradition.bank](http://www.tradition.bank)

## Who we are

Who is providing this notice?	Tradition Capital Bank
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## What we do

How does Tradition Capital Bank protect my personal information?	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.
How does Tradition Capital Bank collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• open an account or deposit money</li> <li>• pay your bills or apply for a loan</li> <li>• use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<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.</p>

## 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>Tradition Capital Bank does not share with our affiliates.</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>Tradition Capital Bank does not share with nonaffiliates so they can market to you.</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 Tradition Mortgage.</i></li> </ul>

## Other important information

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