

Effective Date: May 23, 2016

## Online Privacy Policy

MemoryBank is a trade name of Republic Bank & Trust Company. At MemoryBank, we are committed to safeguarding and protecting your privacy through our compliance with this policy. As our customer, we want you to know how we may collect, use, share, and keep information about you.

This Online Privacy Policy (Policy) applies to this MemoryBank online interface (i.e., website or mobile application) and to any MemoryBank online interface that links to this Policy, (each, a Site, and, collectively, Sites). This Policy describes how Sites may collect, use and share information from or about you, and explains how information may be collected and used for advertising purposes. The terms “MemoryBank”, “we” and “us” may be used interchangeably in this Policy.

### Protecting Children’s Privacy Online

Our websites and apps are not intended for children under 13 years of age. We do not knowingly solicit data online from, or market online to, children under 13 years of age.

This Site is not directed to individuals under the age of thirteen (13), and we request that individuals under the age of thirteen (13) not provide Personal Information through the Site. We do not knowingly collect information from children under 13 without parental consent. Visit the [Federal Trade Commission](#) website for more information about the Children's Online Privacy Protection Act (COPPA). In addition, a banking relationship may not be created or initiated with anyone under the age of 18.

Since we may change this online privacy statement, we recommend that you check the current version available from time to time. If we make changes to this statement, we will update the “Effective Date” at the top of this page.

### Agreement to Policy

By using a Site or interacting with a MemoryBank advertisement, page or account on a third party site or application, you consent to this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

### Collecting and Using Information Personal Information We Collect Online

Personal Information means personally identifiable information such as information you provide via forms, surveys, applications or through other online means including name, postal or email addresses, telephone, fax or mobile numbers, or account numbers.

### How We Use Personal Information

We may use Personal Information:

- to respond to your inquiries and fulfill your requests;
- to inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, including changes to terms, conditions, and policies and/or other administrative information;
- to deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;

- to personalize your experience on the Site;
- to allow you to apply for products or services (e.g., to prequalify for a mortgage, apply for a credit card, or to open a retirement account, investment account or other financial product) and evaluate your eligibility for such products or services;
- to verify your identity and/or location (or the identity or location of your representative or agent) to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- to allow you to participate in surveys and other forms of market research, sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;
- to allow you to use some Site financial planning tools. Information that you enter into one of these planning tools may be stored for future access and use. You have the option not to save the information;
- collected through our social media pages and other online interactions with you to assist in verifying your identity and account status. We may combine this online information with information collected from offline sources or information we already have;
- for business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns;
- for risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements;
- to allow you to utilize features within our Sites by granting us access to information from your device such as contact lists, or geo-location when you request certain services.

## How Personal Information Is Shared

MemoryBank is a trade name for Republic Bank & Trust Company. Republic Bank & Trust Company has a Consumer Privacy Notice that applies generally to all Bank customers and to Personal Information provided to the Bank. In addition to this Policy, the Consumer Privacy Notice governs how your Personal Information collected pursuant to this Policy or otherwise may be shared and how you may be able to limit certain types of sharing. Please review the Consumer Privacy Notice which is provided in the following link: <http://www.mymemorybank.com/privacy-and-security>

## Other Information We Collect Online

Other Information is any information other than Personal Information that does not reveal your specific identity or does not directly relate to an individual, such as browser information, information collected through cookies, pixel tags and other technologies, demographic information, other information provided by you such as your date of birth or household income, and aggregated and de-identified data.

## How We Collect and Use Other Information

We and our third-party service providers may collect and use Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers and/or through your device, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. We use this information to ensure that our Sites function properly, for fraud detection and prevention, and for security purposes.

- **Using cookies:** This site uses first-party cookies (e.g. the Google Analytics cookie) and other first-party identifiers and third-party cookies (e.g. Google advertising cookies). Cookies are pieces of information stored directly on the device you are using. Cookies we use do not contain or capture unencrypted Personal Information. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, language preferences, and your relationship with us. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize/tailor your experience while engaging with us, and to recognize your device to allow your use of our online products and services. We collect statistical information about the usage of the Site to continually improve the design and functionality, to monitor responses to our advertisements and content, to understand how account holders and visitors use the Site and to assist us with resolving questions regarding the Site. We also utilize cookies for advertising purposes. Please see the **Advertising** section below for more information. You can refuse to accept these cookies and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Site and some online products and services. For example, we will not be able to recognize your device and you will need to answer a challenge question each time you log on. You also may not receive tailored advertising or other offers from us that may be relevant to your interests and needs.
- **Other technologies including pixel tags, web beacons, and clear GIFs:** These may be used in connection with some Site pages, downloadable mobile applications and HTML-formatted email messages to measure the effectiveness of our communications, the success of our marketing campaigns, to compile statistics about usage and response rates, to personalize/tailor your experience while engaging with us online and offline, for fraud detection and prevention, for security purposes, for advertising, and to assist us in resolving account holders' questions regarding use of our Site. Please see our **Advertising** section below for more information regarding our use of other technologies.
- **Flash objects:** As part of our solutions for online authentication, we use Flash objects (sometimes referred to as "Local Shared Objects") to help us recognize you and your device when you come back to the Site. For our pages running Adobe® Flash® content (demos and tutorials with moving content), we use Flash objects to determine your browser type and version of Adobe Flash in order for you to view the content. We do not use Flash objects for any online behavioral advertising purpose. Deleting cookies does not delete Flash objects. You can learn more about Flash objects - including how to control and disable them - through the Adobe interface. If you choose to disable Flash objects from our Site, then you may not be able to access and use all or part of the Site or benefit from certain information and services offered.
- **IP Address:** Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, to personalize/tailor your experience while engaging with us online and offline, for compliance and security purposes, for advertising, and for administering the Site. Please see the **Advertising** section below for more information.
- **Aggregated and De-identified Data:** Aggregated and De-identified Data is data that we may create or compile from various sources, including but not limited to accounts and transactions. This information, which does not identify individual account holders, may be used for our business purposes, which may include offering products or services, research, marketing or analyzing market trends, and for other purposes consistent with applicable laws.

## Additional Information

**Third party widgets** – we may allow certain widgets (e.g., social share buttons) on our Sites that enable users to easily share information on another platform, such as a social media platform. The third parties that own these widgets may have access to information about your browsing on pages of our Sites where these widgets are placed. You may wish to review information at the third party site, such as social media platforms where you have an account, to determine how these third parties collect and treat such information. Also, see **Linking to other sites** and **Social media sites** below.

## Advertising

MemoryBank advertises online (e.g., pages within our Sites and mobile apps through bank managed social media presences, and on other sites and mobile apps not affiliated with MemoryBank) and offline (e.g. in banking centers, mass, media, through call centers, and direct marketing). To understand how advertising performs, we may collect certain information on our Sites and other sites and mobile apps through our advertising service providers using cookies, IP addresses, and other technologies. The collected information may include the number of page visits, pages viewed on our Sites, search engine referrals, browsing activities over time and across other sites following your visit to one of our Sites or apps, and responses to advertisements and promotions on the Sites and on sites and apps where we advertise.

MemoryBank uses a tool called Google Analytics to create, collect, and analyze statistical and other information about use of this Site through cookies and other means. MemoryBank also uses the Google Analytics Advertising Features that include Remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and integrates services that require Google Analytics to collect data via advertising cookies and anonymous identifiers. Google Analytics collects information such as how often users visit this Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. We use the information we get from Google Analytics only to improve this Site. Google Analytics collects only the IP address assigned to you on the date you visit this Site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. To learn more about Google Analytics Terms of Use, visit <https://www.google.com/analytics/terms/us.html>. To learn more about the Google Privacy Policy, visit <http://www.google.com/intl/en/policies/privacy/>.

## Opt Out:

For information about how you can opt out of Google's use of cookies, please visit Google's [Ads Settings](#) or the [DoubleClick opt-out page](#). Alternatively, you can opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#). You can prevent Google Analytics from recognizing you on return visits to this site by visiting <https://tools.google.com/dlpage/gaoptout>.

## How we tailor ads:

### Relationship based advertising

To help make our advertising informative and useful, we may use information about your relationship with us (such as types of accounts, transactional information or the state in which you bank) to help determine which advertisements or offers to present to you. We will not use any sensitive information about your financial status or situation to target ads to you on the basis or implication of a negative

financial status or situation.

## Online Behavioral Advertising

We or our advertising service providers may use certain information about your activities on our Sites, such as pages visited and search key words entered to help determine which of our advertisements or offers may be of interest to you. We limit our advertising service providers and allow them to access and collect information only for specific purposes. We may use this online information for online and offline advertising.

## Advertising on third party sites and mobile apps

MemoryBank contracts with advertising companies to advertise our products and services on sites and mobile apps not affiliated with us. We may use Aggregated and De-identified Data and information provided by you to these third party sites and mobile apps to select which of our advertisements or offers may appeal to you, display them to you and monitor your responses. Third Party sites and mobile apps are not subject to this MemoryBank Privacy Policy. Please visit the individual sites and mobile apps for additional information on their data and privacy practices and opt out policies.

## Online Behavioral Advertising on third party sites and mobile apps

Some of our tailored ads are online behavioral advertising, and may be served using data collected by third party providers. Ads served on our behalf by these companies do not contain unencrypted Personal Information and we limit the use of information by companies that serve our ads. To learn more about this practice and your choices in connection with it, see the section **Advertising Choices** below

## Advertising Choices

You may set your choices for advertising in the following ways:

**Online Behavioral Advertising:** If you prefer we not use information based on online Site behavior to provide online and offline tailored content and advertising, you may opt out of online behavioral advertising. Opting out also means that the online content and advertising you receive on our non-servicing sites (i.e. before sign-in) will be untailored and will not be based on your online behavior or your relationship with the Bank.

Please note that if you opt out of this advertising, you may still receive untailored advertising from MemoryBank. When accessing online account servicing areas (i.e. after sign-in), such as Online Banking, you may receive tailored content and advertising based on your account relationships.

## Advertising on third party sites:

### Mobile Applications

MemoryBank's Mobile Applications for accounts ("Applications") allows you to access your account balances and holdings, make deposits, transfers and pay bills on your mobile device. This Policy applies to any Personal Information or Other Information that we may collect through the Applications.

## Linking to other sites

We may provide links to third party sites, such as credit bureaus, service providers or merchants. If you follow links to sites not affiliated or controlled by MemoryBank, you should review their privacy and security policies and other terms and conditions, as they may be different from those of our Sites. MemoryBank does not guarantee and is not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information.

## **Social media sites**

MemoryBank provides opportunities on social media platforms including, but not limited to, Facebook®, Twitter®, YouTube® and LinkedIn® that enable online sharing and collaboration among users who have registered to use them. Any content you post on official MemoryBank managed social media pages, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms. Please refer to them to better understand your rights and obligations with regard to such content.

## **Security**

To protect Personal Information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third party service providers to help ensure that information remains confidential and secure.

## **Using other aggregation websites**

Other companies offer aggregation websites and services that allow you to consolidate your financial account information from different sources (such as your accounts with us or with other financial institutions) so that you can view all your account information at one online location. To do this, an aggregation provider may request access to Personal Information, such as financial information, usernames and passwords. You should use caution and ensure that the aggregator company has appropriate policies and practices to protect the privacy and security of any information you provide or to which the aggregator company is gaining access. We are not responsible for the use or disclosure of any Personal Information accessed by any company or person to whom you provide your Site username and password.

If you provide your Site username, password or other information about your accounts with us to an aggregation website, we will consider that you have authorized all transactions or actions initiated by an aggregation website using access information you provide, whether or not you were aware of a specific transaction or action. If you decide to revoke the authority you have given to an aggregation website, we strongly recommend that you change your password for the Site to ensure that the aggregation website cannot continue to access your account.

## **Making sure information is accurate**

Keeping your account information accurate and up to date is very important. If your account information is incomplete, inaccurate or not current, please use the Contact Us option on our Site, or call or write to us at the telephone numbers or appropriate address for changes that is provided on your account statements, records, online or other account materials. You can also speak to a customer representative at a banking center, your Financial Advisor at the Bank or an account representative.

## **Protecting individual health information**

To the extent that we receive, maintain, or process an individual's protected health information, Memory Bank may disclose that information as authorized by and in accordance with applicable federal and/or state law.

## **California Residents**

If you are a California resident under the age of 18, and a registered user of any of our Sites, California

law permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send MemoryBank a detailed description of the specific content or information. Please be aware that such a request does not ensure complete removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested. In addition, if you are a California resident California law also permits you to request that we identify the Personal Information we collect and third parties that received the Personal Information for the third parties' direct marketing purposes during the preceding calendar year. To make such a request, please send us a detailed description of the specific content or information.

### **Retention Period**

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law.

### **Updates to this Privacy Policy**

This Online Privacy Policy is subject to change. Please review it periodically. If we make changes to the Online Privacy Policy, we will revise the "Last Updated" date at the top of this Policy. Any changes to this Policy will become effective when we post the revised Policy on the Site. Your use of the Site following these changes means that you accept the revised Policy.