



# Digital Privacy and Cookies Policy

*Date of most recent update: May 10, 2019*

## **Introduction and scope of policy**

The Digital Privacy and Cookies Policy ("Policy") applies to your interaction with SFC Bank or any of its subsidiaries (collectively "we," "us," "our"), at any online or mobile site or application that we own and control ("Site"), unless a different online and/or mobile policy is posted at a particular site, or is made available to you and by its terms supplants this Policy. Other privacy policies may also apply in addition to the terms of this Policy. As examples, certain additional SFC Bank privacy-related policies and notices are posted on SFC.bank. These include the SFC Bank Consumer Privacy Notice, which also applies to U.S. customers and consumers as described in that notice and various international privacy policies, which apply to information collected by us outside of the U.S. as described in those policies. You may also receive an additional privacy notice in connection with your use of a particular product or relationship with a specific business. For example, Trust or fiduciary accounts for which SFC Bank is the trustee or service provider, including employer-sponsored retirement accounts, are protected under special rules of confidentiality. Information on these accounts is not shared for marketing purposes without specific consent. This Policy also explains certain data use and data protection functionalities and practices of our online ads, such as banner ads, on third party sites. Please note that where we have another type of presence on a site owned by a third party, such as a page or handle on a social media site, that third party's privacy policy and terms of use, rather than this Policy, will govern, unless specifically stated otherwise.

## **Agreement to policy**

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

## **Types of information**

You may interact with us in a variety of ways online, including through a mobile device. We may offer sites or applications that permit browsing and do not require registration. We may also offer the ability to enroll, register or access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, address, email address, other contact information; data resulting from your activity, such as transaction information; and location information. We may also gather additional information, such as the type of device and browser you are using, the IP address of your device, information about your device's operating

system, and additional information associated with your device. We may also gather information collected through cookies, tags, and other technologies, as described further below.

### **About “cookies” and Ad Choices on third party sites**

Cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server. Mobile applications may also use cookies.

We use cookies and information gathered through their use to make your experience with SFC Bank and certain other sites richer and more personalized based on the products, services, or other interaction you have with us and other sites. Information gathered through use of cookies may be used to make offers to you via online ads, email, U.S. mail, or telephone, subject to the privacy preferences you have on file with SFC Bank. (Privacy preferences for employer-sponsor retirement accounts default to no marketing, solicitation or sharing for marketing purposes without specific consent.) We also use cookies, sometimes in conjunction with service providers, in online advertising either on our own Site or on third party sites to help determine which of our advertisements are most likely to appeal to you. We respect consumers’ ability to exercise choice in receiving these types of ads on third party sites. We honor your choice as follows: For this type of advertising placed on third party sites, we participate in the program utilizing the “Unsubscribe” link. If you receive an ad delivered on a third party site in part based on information gathered through the use of cookies, you may opt out of receiving such ads by clicking the “Unsubscribe” link and following the instructions or by visiting <http://www.aboutads.info/choices/>. This “unsubscribe” link works via cookies, so if you delete cookies, use a different device, or change web browsers, you will need to opt out again. Please note that we respect your choice via participation in the Bank advertising campaigns. Information that we collect about you from one particular browser or device may be used to provide advertising or collect information on another browser or device. It may also be transferred to a third party for advertising or information collection on behalf of SFC Bank. Please note that your choice to “Unsubscribe” on a particular browser or device will apply only to the collection and use of information from that particular browser or device. “Unsubscribing” on a particular device will not “unsubscribe” out of information collection on other devices, nor will it limit cross device sharing on those other devices. Industry standards are currently evolving and we may not separately respond to or take any action with respect to a “do not track” configuration set in your internet browser. The “unsubscribe” link does not apply to transactional communications from SFC Bank in connection with providing services on an account.

Other parties that may collect information about your web browsing behavior when you use our Site are generally limited to service providers who may only use any information collected to provide services and marketing for us and not to provide services or advertising for any other party. Note, however, that we also provide certain widgets or tools on our sites, such as tools that allow web surfers to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our site, such as a map or information streaming from another site, including communications streaming from a third-party social media platform. These widgets, tools, and informational items often function through the use of third-party cookies utilized by the third-party site, such as the social media platform. As a result, these third parties may have access to information about your web browsing on the pages of our Site where these widgets, tools, or information are placed. You may wish to review information at third party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our site; monitoring online promotions; and anti-fraud and information security purposes.

### **Do you have to accept cookies?**

You may be able to set your browser to reject browser cookies. However, if you choose to reject cookies, you cannot access your accounts online with SFC Bank. Therefore, if you set your browser options to disallow cookies, you will limit the functionality we can provide when you visit our Site. The latest versions of internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by browser providers for more specific information, including how to use these tools.

### **Additional cookies**

Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We may use this technology for online behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our Site.

**Additional technologies.** We may also use additional technologies such as pixel tags, web beacons, and clear GIFs, and may permit our third-party service providers to use these technologies. We use

these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers to present to you on our own or on third party sites.

**Using information.** In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Site, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our sites; and using read-receipt notifications in our email communications.

### **Sharing**

We may share information with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. As applicable, please see the additional privacy policies referenced above, such as the SFC Bank Consumer Privacy Notice, for more information on how we may share information with affiliates and third parties.

### **Children's privacy**

From our web pages, we do not knowingly collect personal information from individuals under the age of 13 without obtaining verifiable consent from their parents or legal guardians. We request that such individuals do not provide personal information through the services.

For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: [www.ftc.gov/Opens Dialog](http://www.ftc.gov/OpensDialog).

### **Policy updates and effective date**

If we make updates to this Policy, we will update the Policy with the changes and revise the "date of most recent update" posted at the top of this Policy. Any updates to the Policy become effective when we post the updates on the Site. Your use of the Site following the update to the Policy means that you accept the updated Policy.