Collinsville Building & Loan Association
Digital Banking Privacy Policy

General

This Digital Banking Privacy Policy is intended to supplement the disclosures in any Privacy Notice that you may have already been presented by Collinsville Building & Loan Association (the "Association") in connection with any account opening, digital banking, or other service. This Policy is inclusive of both digital banking platforms: the online, browser-based platform as well as the downloadable Collinsville Building & Loan Mobile App platform.

We want you to understand the types of information we access, collect, use, store, and transfer ("Process") through our platforms. The use of your information is limited to the following purposes:

- to provide you with digital banking and related services ("Services");
- to maintain & improve our Services;
- to ensure our Services are working as intended, such as tracking outages or troubleshooting issues that you report to us;
- to measure user engagement and the performance of our Services;
- to communicate with you;
- to protect our Association and customers from fraud, abuse, security risks, and technical issues; and,
- any other specific purposes referenced or described in this Digital Banking Privacy Policy.

We will always ask for your consent before using your information for a purpose that isn't covered in the Digital Banking Privacy Policy or the Privacy Notice.

Information you enter or provide to us

When you register, access, and use the Services, you provide us with personal and sensitive information such as your name, password, government identifiers like your social security number (SSN) or drivers' license number, phone number, email address, physical or mailing address, financial information, and payment information.

Other information we collect as you use our Services

The information we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. Other information including crash reports may be included depending on your individual device settings.

Your activity

We collect information about your activity in connection with our platforms, to better understand:

- your interactions and behavior associated with the Services' content and features;
- the ways in which you are moving through and navigating the digital banking platform(s);
- the Services and features that are most valuable to you;
- areas or stages of the App where you may disengage or get stuck; and
- your typical patterns of behavior in connection with the App.

The activity information we collect may include:

- logs, tags, reporting, and other analytics reflecting your navigation through, engagement with, and disengagement with the App;
- haptic information related to your use of your device (e.g. swipes, taps);
- your financial, payment, and transaction activity and history (including purchase history); and
- your navigation to or activity on third-party sites and apps linked to our App.

This information enables us to improve, modify, or expand the services, features, and experience delivered through the App as well as to support in-App messaging and optimize performance of the App. Additionally, and in particular, this information also enables us to detect and flag suspicious or potentially fraudulent activity.

Your device

We access and collect information related to your device along with associated data. This information may be collected both while you use the App and while the App is running in the background or is otherwise not in use.

Information we process concerning your device and other Apps includes:

- your device type;
- your device ID;
- other available device identifiers;
- your device operating system;
- network and IP address information;
- your cellular data carrier; and
- device and app diagnostic information.

If our App should need to access additional protected features of your device, then you will have an opportunity to provide consent. In the event that you decline to provide express consent, then the App will not be permitted to access data gated by your device's permissions model. Without your express consent, the App will not allow use of the protected feature or related data.

If and when our App accesses your device location or other background restricted permissions, then all related data is treated as personal or sensitive data subject to this Digital Banking Privacy Policy and the Digital Banking Agreement.

Restricted permissions accessed by our App include:
- Use of Fingerprint and Facial Recognition
  - We collect information about your biometric and facial identifiers when you use our App, which enables us to streamline your authentication and login experience and access our Services with less friction.
- Precise or Fine Location
  - We collect information about your location when you use our App, which helps us offer features like office location.
- Access Camera or Pictures/Photos

     o   We collect information from your device's camera and photos when you use our App, which enables use of adding receipt images and the mobile deposit feature of the App.

Sharing your information

Our App will only share information with third parties with your consent, for the purpose of providing you with Services, or for the other ancillary purposes described in this Digital Banking Privacy Policy.

Our App processes your financial or payment information or government identification numbers and will never publicly disclose any personal and sensitive user data related to financial or payment activities or any government identification numbers.

Our app includes third-party code and software development kits (SDKs) that may collect personal and sensitive user data solely for the purposes described in this Digital Banking Privacy Policy. All third-party providers of code and SDKs will process your data in accordance with this Digital Banking Privacy Policy and all applicable laws and standards.

Neither we nor our third-party providers will ever sell your personal and sensitive data processed by the App.

The App handles all personal and sensitive user data securely, including transmitting it using modern encryption protocol.

Retention

We will retain, protect, use, and share Personal Information about you if it is reasonably required for the purposes described in this Digital Banking Privacy Policy, and is required by law, including but not limited to for risk management, regulatory compliance, and audit purposes.

Digital Banking Account Deletion

You have the right to delete your digital banking app accounts and associated data at any time. You may request your account deletion in the following ways:

1. Send a secure message through the digital banking platform(s);
2. Send an email to depositservices@collinsvillebuildingandloan.com;
3. Send a letter to: Collinsville Building & Loan Association, Attn: Deposit Services, 701 Belt Line Rd, Collinsville, IL 62234;
4. Complete the Digital Account Deletion form on our website at www.collinsvillebuildingandloan.com.

Email is not always secure against interception; therefore, confidential information should not be sent to CB&L via email. If your communication is sensitive, or includes personal information such as your account numbers, debit card number, or social security number, please call us.

A representative from Collinsville Building & Loan will contact you to confirm your request. Please include your name, email address, and phone number in your request.

Once your application account has been deleted, the deleted user data will be archived by the Association's service provider, Finastra, to facilitate account recovery purposes only. The archived user data includes information that links the user to the Association and their personalized settings. Archived

user data cannot be used to access financial accounts or other protected information. Archived user data is retained indefinitely, until Finastra is no longer our service provider, at which time all data will be permanently deleted.

Children's Online Privacy Protection Act

Digital Banking is not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13 years of age without parental consent and we comply with the practices established under the Children's Online Privacy Protection Act.

Digital Banking Privacy Policy Q&As

1. **Why would Collinsville Building and Loan's mobile application need access to my device's camera?**
   To use mobile deposit, you will have to use your device's camera to take a picture of the check(s) being deposited. To add a receipt image, you will use your device's camera to take a photo of the receipt, or you have the option to upload an image from the library When you use the mobile app to make a mobile deposit, you have the option to allow the app to take pictures only while using the app or only one time at each mobile deposit.

2. **Why would Collinsville Building and Loan's mobile application need access to my location?**
   To use the "locations" feature to get directions from your location to Collinsville Building and Loan.

3. **What if I do not want the Collinsville Building and Loan Mobile Banking app to have access to my camera or my location?**
   You can restrict access, including restricting access to only allow access while the application is in use or for the application to ask your permission every time or even to deny access, by setting your permissions for the camera and location in the settings on your device. If you deny access, then you will need to update your access restrictions when you do use mobile deposit or locations in the app.