

# Citizens First Bank | Online Privacy Notice

Effective: August 15<sup>th</sup>, 2017

At Citizens First Bank, we are dedicated to safeguarding your privacy. We want you to know how we may gather, use, share, and retain information about you and the choices you may have.

When we provide Citizens First Bank products or services to you, we may also give you specific additional details about how we will use your personal information.

This online privacy notice applies to Citizens First Bank websites and online applications that run on smart phones, tablets, and other mobile devices (“apps”) that link to this Notice.

## Protecting Children's Online Privacy

We recognize the importance of protecting the privacy of children online, and we comply with the requirements of the Children’s Online Privacy Protection Act that are applicable to us. We do not knowingly collect personal information from consumers under the age of 13.

The Children's Online Privacy Protection Act (COPPA) was passed to give parents increased control over what information is collected from their children online and how such information is used. The law applies to websites and services directed to and which knowingly collect information from children under the age of 13. Citizens First Bank does not knowingly solicit individually identifiable personal information from or about children online and does not knowingly market our products to children online. We fully support protecting children’s identities and privacy online and recognize the responsibility to do so rests with both the online industry and with the parents.

For additional information on COPPA protections, to protect your child’s privacy online, visit the Federal Trade Commission's website at <https://www.consumer.ftc.gov/articles/0031-protecting-your-childs-privacy-online>, aimed at educating both parents and children about the dangers of the Internet and how to browse safely.

Please note, the content of this notice is subject to change. When updated, we will update the “Effective” date at the top of this page.

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## What information does this Online Privacy Notice cover?

This online privacy notice describes how we (and our [Service Providers](#) may collect, use, share, and keep information that we get about you online. We gather [Online Information](#) if you:

- Visit or use our websites or apps;
- Receive or reply to electronic communications from us;
- View or click on our ads or other online content; and
- Interact with us through social media websites and other websites and apps.

In this notice, we also explain how we may combine [Online Information](#) with [Other Information](#) and how we then use the combined information.

## What information do we collect online and how do we collect it?

The types of information we collect depends on which product or service you use.

Sometimes you give information directly to us (or to our [Service Providers](#) For example, you might give us your name, account number, email, mailing address, phone number, or date of birth when you:

- fill out an online form or survey;
- register, log into or update the settings on your account using our online services;

We (and our [Service Providers](#) or [Third-Party Ad-Servers](#) ) also collect information through [Cookies and Similar Technologies](#) Most [Cookies and Similar Technologies](#) will only collect [De-Identified Information](#) such as how you arrive at our website or your general location. However, certain [Cookies and Similar Technologies](#) do collect [Personal Information](#). For example, if you click *Remember Me* when you log in to our website, a cookie will store your username.

We (and our [Service Providers](#) or [Third-Party Ad-Servers](#) ) may collect information using [Cookies and Similar Technologies](#) about:

- the device you use to browse our websites (for example, we may collect information about the operating system or the browser version and the type of device you use to open electronic communications from us);
- the [IP Address](#) and information related to that [IP Address](#) such as domain information, your internet operating system or the browser version and the type of device you use to open electronic communications from us);
- browsing history on our websites or apps (such as what you search for, the pages you view, how long you stay, and how often you come back);
- how you search for our websites or apps, from which website you came from;
- which ads or online content from us you view, access, or click on;
- your browsing activities over time and across other websites, following your visit to one of our websites or apps;
- whether you open our electronic communications and which parts you click on; and

We (and our [Service Providers](#) or [Third-Party Ad-Servers](#) ) may also collect information made publicly available through third-party platforms (such as online social media platforms), through online databases or directories, or that is otherwise legitimately obtained. This information may be governed by the privacy notice(s) provided by the third-party at the time of collection.

## How do we use the information we collect about you?

We may use **Online Information** we collect about you on its own or combine it with **Other Information** to:

- deliver products and services, including to:
  - recognize you when you return to our websites or use our apps;
  - complete transactions;
  - tell you about updates to your accounts, products, and services;
  - update you about new features and benefits;
  - answer questions and respond to your requests made through our websites or apps and through third-party websites (including social media);
  - determine how to best provide services to you and manage your accounts, such as the best way and time to contact you;
  - improve our websites and make them easier to use;
- advertise and market our products and services to:
  - send or provide you with ads, promotions, and offers;
  - analyze whether our ads, promotions, and offers are effective;
  - help us determine whether you may be interested in new products or services;
- conduct research and analysis, including to:
  - better understand our customers and website visitors or app visitors;
  - produce data analytics, statistical research, and reports;
  - review and change our products and services;
- manage fraud and security risk, including to:
  - detect and prevent fraud or criminal activity;
  - safeguard the security of your information;
- assess credit risks relating to our business, including to:
  - evaluate and process your applications for our products and services and manage your existing accounts; and
- use it in other ways as required or permitted by law or with your consent.

## How do we share your information?

Some **Online Information** is **Personal Information**.

## How we treat your **Personal Information**

We do not share **Personal Information** with anyone except as described below. We may share **Personal Information** as required or as permitted by law, such as:

- with credit bureaus and similar institutions to report or ask about your financial circumstances, and to report or collect debts you owe;
- with regulatory authorities, courts, and governmental agencies to comply with legal orders, legal or regulatory requirements, and government requests;
- with our **Service Providers**, regulatory authorities, and governmental agencies to detect and prevent fraud or criminal activity, and to protect the rights of Citizens First Bank or others;
- with our **Service Providers** who perform services for us and help us operate our business (we require **Service Providers** to safeguard **Personal Information** and only use your **Personal Information** for the purposes we specify);
- with financial institutions or **Co-brand Partners** with whom we jointly offer or develop products and

services (but they may not use your **Personal Information**— in particular your email address — to independently market their own products or services to you unless you consent that they can do so);

- for specific products or services, when you have given your consent.

We may transfer **Personal Information** to **Service Providers** or to process transactions and provide you with our products or services. Regardless of where we process your information, we still protect it in the manner described in this online privacy notice and according to the applicable laws.

### **How do we keep and safeguard your information?**

We use administrative, technical, and physical security measures to protect your **Personal Information**. These measures include computer safeguards and secured files and facilities. We take reasonable steps to securely destroy or permanently de-identify **Personal Information** when we no longer need it. We will keep your **Online Information** only as long as we must to deliver our products and services, unless we are required by law or regulation or for litigation and regulatory investigations to keep it.

### **What are your choices?**

You have choices about how Citizens First Bank uses your information, such as how we market to you.

You can choose whether you would like to receive direct marketing communications via email and/or telephone. Please be aware that if you choose not to receive such communications, certain offers attached to the products or services you have chosen may be affected. We will still communicate with you in connection with servicing your account, fulfilling your requests, or administering any promotion or any program in which you have elected to participate.

You can also follow the instructions on the bottom of emails. If you have questions about our online privacy notice, call us Toll Free at 877.902.1442.

### **How can you update your Personal Information?**

To update your personal information please call us at 563-243-6000 or Toll Free at 877-902-1442 to speak with Customer Service.

## Glossary

**Citizens First Bank (we, our, us)** — the Citizens First Bank Company as identified at the beginning of this online privacy notice.

**Co-brand Partners** — businesses we partner with to offer cards featuring both brand logos (for example SHAZAM). technology

**Cookies and Similar Technologies** — a *cookie is* a small data file that a website transfers to your computer's hard drive. In some instances, Citizens First Bank may use cookies to help us establish your identity when you visit our web site. This technology is only used to improve your experience on our web site by sending you more personalized information and product offers. We do not use cookies to get data from your hard drive or to get your email address or any other personal information. We use the term **Cookies and Similar Technologies** in this notice to refer to all technologies that collect information in this way.

**De-Identified Information** — data or information used in a way that does not identify you to a third party.

**IP Address** — a number assigned to a device when connecting to the Internet.

**Online Information** — data or information collected on the Citizens First Bank websites and apps as well as on websites and apps of third parties relating to topics about our business.

**Other Information** — Citizens First Bank internal information (for example, Card transaction data), external data that financial companies use to process applications and complete transactions, and other information we collect from or about you.

**Personal Information**— information that can identify a person, such as name, address, telephone number, and email address.

**Service Providers** — any vendor, third party and/or company that performs business operations on our behalf, such as printing, mailing, and other communications services (email, direct mail, etc.), marketing, data processing, servicing, collections, or ad management.

**Third-Party Ad-Servers** — companies that provide the technology to place ads on websites (and apps) and track how ads perform. These companies may also place and access cookies on your device. The information they collect from our websites is in a form that does not identify you personally.