

# The Peoples Bank Online Privacy Notice

**Last Updated: 7/7/2023**

Your privacy is important to The Peoples Bank Co. (“PBC”). This Online Privacy Notice (“Notice”) refers to how we manage your personal information as you interact with us online or through our mobile apps, website, and social sites (“Services”) using your computer or any other mobile devices (“Devices”).

This Online Banking Privacy Notice, in combination with other relevant privacy, policies that we provide to you (e.g., pursuant to financial privacy laws), inform you of the policies and practices regarding the collection, use, and disclosure of any personal information that our service providers and we collect from or about users in connection with the apps and website.

## **THE TYPES OF INFORMATION WE COLLECT IN THE APP**

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

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

- When you create an account, we may collect personal information from you, such as your first and last name, address, e-mail, telephone number, and social security number.
- 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 and any other content included in the email such as any images you upload, 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, in order to provide some of our Services.

(c) Personal Information Collected Via Technology. Our service providers and we 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 (e.g., phone, tablet), IP address, unique identifiers such as biometrics, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), 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 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, 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, 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.
- Video conferencing is used to identify you and communicate your need through the service. Video Conferences are not recorded or stored. Images you uploaded may be stored in your profile with the bank.

## **HOW WE USE YOUR INFORMATION COLLECTED IN THE APP**

(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 App, in the following ways:

- facilitate the creation of, 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 e-mail notifications, such as security or support and maintenance advisories; and
- 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 processes, such as responding 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; and
- prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.

(c) Creation of Non-Identifiable Data. The App 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 at our discretion.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

To help deliver products, services, and content tailored to your online services and use, we may share aggregated and anonymous information with third parties.

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

(a) In combination with other relevant privacy notices that we provide to you (e.g., pursuant to financial privacy laws), 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 App's website and mobile application. Other than as described in this Privacy Notice in connection with the App, Website, etc., this Privacy Notice 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 App, for the purposes described in this Privacy Notice, 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 App.

(c) Authorities and Others. Regardless of any choices you make regarding your personal information, The App 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 App may contain links to third-party websites. When you click on a link to any other website or location, you will leave the App and go to another site. Another entity may collect personal and/or anonymous information from you. The App's provision of a link to any other website or location is for your convenience. It 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 Notice do not apply to these external websites. We encourage you to read the privacy notice of every website you visit.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

You have several choices regarding the 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 take action in response to these signals. If and when a standard is established, we may revise its notice 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 received an email from us, your email is either listed with us as someone who has shared this information to receive electronic information you have registered for or have an existing relationship with us or are using our Services. Any promotional email contains an unsubscribe link to cease receiving promotional emails. If you would like to discontinue all electronic communications, please contact us as described below to Opt-Out of all electronic communications. Please note, if you withdraw consent to all electronic communications, you may no longer be able to use some or all of the Services.

(d) Opting Out of Location Tracking. If you initially consented to the collection of geolocation information through the Services, you could subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the App.

## **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 16, and we do not, through the App, intentionally gather personal information about visitors who are under the age of 18 with the exception of the PBC Student Account product. If a child under the age of 18 submits personal information to us through the App for any reason besides the PBC Student Account, we will attempt to delete the personal information of the child under 18 as soon as possible.

## **PRIVACY NOTICE UPDATES**

This Privacy Notice 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 Notice will be effective when posted unless otherwise indicated. If you object to any such changes, please notify the Bank that you wish to deactivate your account. Continued use of the Services following notice of any such changes shall indicate your acknowledgment of such changes.

## **CONTACT US**

If you have any questions or complaints about this Privacy Notice or The App's data collection or processing practices, or if you want to report any security violations to The App, please contact The App by email at: [bankmail@pbc.bank](mailto:bankmail@pbc.bank), or by phone 1-866-722-2265, or by mail at:

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