Online Privacy Policy

We respect and value your privacy and are committed to maintaining your trust and confidence. This policy describes the types of information Bristol County Savings Bank may collect from you or that you may provide when using any online or mobile site or application that we own or control ("Site"), unless a different online and/or mobile or other privacy policy is posted at a particular site, or is made available to you. This policy also explains how Bristol County Savings Bank collects, uses, maintains, protects, and, in some circumstances, discloses that information.

Bristol County Savings Bank does not sell users' personal information. As described more fully below, Bristol County Savings Bank values the information it has about people who access or interact with the Site, and we use this information to enhance the Site and our visitors' experiences.

Certain information we collect is necessary to complete our contractual or legal obligations, other information is required for us to operate the Site

Federal and state laws give consumers the right to limit some but not all sharing of their information. These laws also require us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

By visiting or using the Site or interacting with any of our advertisements, you accept and consent to the data collection, usage, and sharing practices described below and agree to this policy.

We may change this policy from time to time. We encourage you to review this policy each time you visit our Site. By using our Site, you agree to the terms of the most recent version of this policy.

Types of personal information we collect online

The type of personal information we collect from and about you online will depend on how you interact with us and may include:

- Contact Information such as name, mailing address, email address, telephone and mobile number(s),
- Account Application information such as credit and income information,
- Identifiers such as social security number, account number(s), driver's license number (or comparable) or other information that identifies you for ordinary business purposes
- Access Authorization such as user name, alias, PIN and passcode and security questions and answers
- Information from your computer, smartphone, tablet or other mobile device, such as
 - Unique device identifiers (for example Media Access Control (MAC) and Internet Protocol (IP) addresses)

- o Browser type, version, language, and display/screen settings
- Information about how you use and interact with our Sites and Mobile Apps (for example page visited, links clicked)
- o Responses to advertisements on the Sites and Mobile Apps where we advertise
- Log information such as your search and voice to text queries in the mobile app
- Search engine referrals
- Geolocation information with consent, for example ATM or financial center location, fraud prevention)
- Social media preference

We'll refer to this information, and any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device, as "personal information." In some instances, we de-identify data by removing personal information. Once de-identified, the data is no longer attributed to a single unique individual. De-identified information is non-personal information that we may treat like other non-personal information.

If you do not want us to have this information, you can choose not to provide it to us, but then you might not be able to take advantage of many of Bristol County Savings Bank's services or features available through the Site.

Types of Information we collect automatically

As you navigate through and interact with the Site, Bristol County Savings Bank may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including, without limitation:

- What pages you visit and what actions you take on the Site
- The time and length of your visits to the Site
- The addresses of websites and advertisements that brought you to our Site
- Keywords used in searches that brought you to our Site
- Your browser version, device type, and operating system
- Your Internet Protocol (IP) address and its geolocation
- Your Internet Service Provider (ISP)

We'll refer to this information as "site-usage information" as it is information collected about your use of and interaction with the Site that does not reveal your specific identity and does not directly relate to an individual.

The information Bristol County Savings Bank automatically collects does not include your name or other directly personal data, but we may maintain it or associate it with personal information we collect in other ways.

First party cookies

Bristol County Savings Bank uses different types of cookies to automatically collect certain data to improve your experience with the Site, and to allow us to track certain information about how visitors use the Site. We do not share or sell any data collected by our cookies. Bristol County Savings Bank uses the following kinds of cookies to enhance your Site experience:

- *Cookies (or browser cookies).* A cookie is a small file placed on the hard drive of your computer. When you first visit the Site, you are alerted to the fact that we use cookies. You can decline the cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser settings to refuse cookies, the Site will issue cookies when you direct your browser to the Site.
- Flash Cookies. Certain features of the Site may use locally stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on the Site.
 Flash cookies are not managed by the same browser settings that are used for browser cookies.
 If you wish to prevent or restrict Flash cookies, you must do so from within your Adobe Flash Player Settings Manager
- Web Beacons. Pages of the Site and emails sent by Bristol County Savings Bank may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and singlepixel gifs) that permit Bristol County Savings Bank, for example, to count users who have visited those pages or opened an email, and for other related Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity).
- Social Media Pixel Tags. Bristol County Savings Bank uses pixel tags, a type of web beacon, on social media sites, to serve relevant and targeted advertisements to you during or after your visits to our social media properties.
- To learn more about cookies, please visit the external site <u>http://www.allaboutcookies.org/</u>.

Third party cookies

Advertising

We advertise our products and services online through non-affiliated third parties. These advertisements may take the form of banner ads, text-based search ads, social media ads, or other formats. We use information about your location, device, and browsing activities in order to present tailored ads to you, analyze the effectiveness of those ads, and determine whether you might be interested in new products or services.

These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

Bristol County Savings Bank does not control these third parties' tracking technologies or how they

may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Applications

We also rely on third-party service providers to provide services for us. These other parties may collect information about your web browsing behavior when you use our Site. Through these third-party service providers Bristol County Savings Bank may offer certain widgets or tools on the Site to enhance your online experience. Note that these third-party widgets or tools are sometimes embedded in the Site.

Social Media

Bristol County Savings Bank engages with customers on social media platforms such as Facebook[™], Twitter[™], YouTube[™] and LinkedIn[™]. You should never post any sensitive personal information such as account numbers or social security numbers on these social media platforms. Any content you post on social media platforms, 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.

How we use your personal information

Personal information collected from and about you online described herein may be used for many purposes such as:

- **Delivering products and services to you** by verifying your identity (for example when you access your account information); processing applications for products or services such as to prequalify for a mortgage, apply for a credit card, or to open a retirement account, investment account or other financial product; processing transactions; finding nearby ATMs, and Bank branches.
- **Personalizing your digital and mobile experience** by enhancing overall Sites and Mobile Apps organization and design and analyze data to create relevant alerts, products or services.
- **Providing advertising** on our Sites and Mobile Apps as well as non-affiliated third party sites and through off-line channels like financial centers, call centers and direct marketing (for example email, mail and phone).
- **Detecting and preventing fraud**, identify theft and other risks to you or Bristol County Savings Bank.
- **Performing analytics** concerning your use of our online services, including your responses to our emails and the pages and advertisements you view.
- **Complying with and enforcing applicable legal requirements**, relevant industry standards, contractual obligations and our policies.
- Allowing you to use features within our Sites and Mobile Apps when you grant us access to personal information from your device such as contact lists, or geo-location when you request certain services that requires such access, for example locating an ATM.

We retain personal information for a period of time as required by laws and regulations and the necessary business purpose. We securely delete personal information as soon as legally permitted.

Individual health information

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

With whom do we share your personal information

Bristol County Savings Bank values the information it has about those who access or interacts with the Site and is not in the business of selling that information to others. We do share your information for the purpose of conducting our business with you or to comply with legal obligations. For example, under certain circumstances, Bristol County Savings Bank may need to disclose collected personal information in order to:

- Disclose to third parties and affiliates that support our business and that have contracts with us
- Comply with any court order, law, legal process, or to respond to any government or regulatory request, including requests related to laws outside of your country of residence
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us
- Protect the rights, property, or safety of Bristol County Savings Bank, its affiliates and subsidiaries and its and their employees, customers, or others
- Enforce our terms and conditions
- Permit us to pursue available remedies and/or limit the damages that we sustain
- Fulfill our recordkeeping obligations and practices
- Fulfill any other purpose disclosed by us when you provide the information
- Comply with your instructions.

Aggregated / De-identified information

Collected personal information may be aggregated and/or de-identified (we remove any details that identify you personally). We may share this aggregated and/or de-identified information with service providers, vendors and third party providers to help deliver products, services, and content that are better tailored to the users of our online services and for our own business purposes where permissible under applicable laws and regulations.

How do we protect your information

We and our third-party service providers use reasonable organizational, technical and administrative measures to protect the information under our control. To protect your personal information from unauthorized access and use, we use security measures that are designed to comply with federal law. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. Any transmission of personal information is at your own risk.

Use of email is inherently insecure. Please do not send us sensitive information through email. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the

security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us in accordance with the "Contact Us" section below. (Note that if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem.)

What are my choices?

You can always choose not to provide information, even though it might be needed to take advantage of some offers or features of the Site. Also, please see <u>Consumer Privacy Policy</u> to understand your additional options.

You can decline to visit the Site, set your browser to block cookies, or erase Bristol County Savings Bank cookies from your computer, though doing so may prevent some aspects of the Site from working properly. You can also prevent data collection by Google Analytics by visiting <u>https://tools.google.com/dlpage/gaoptout</u> and downloading Google's "Google Analytics Opt-Out Browser Add-on". This browser add-on places an opt-out cookie on your browser, which prevents the future collection of your data by Google Analytics when visiting this (or other) websites. This opt-out cookie must be stored permanently on your computer. If you delete this cookie by removing the add-on, or if it is deleted automatically via browser settings, you will have to install it again before visiting the Site in the future, or your data will be collected by Google Analytics.

If you wish to opt out of having certain Google ads shown to you based on factors such as your interests, previous visits to other websites, and demographic details on your computer's browser, you can do so by visiting <u>https://support.google.com/ads/answer/2662922?hl=en</u>.

If you no longer want to receive marketing or promotional email from Bristol County Savings Bank, please press the unsubscribe button at the bottom of our emails, or contact us at <u>marketing@bcsbmail.com</u>. Please note that if you are a Bristol County Savings Bank customer we may be required to continue providing certain communications to you, such as those concerning your accounts.

Children under the age of 13

The Site is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Site. Bristol County Savings Bank does not knowingly collect personal information from children under 13 on this Site. If you are under 13, do not use or provide any information on the Site or on/through any of its features, register on the Site, make any purchases through the Site, use any of the interactive or public comment features of the Site, or provide any information about yourself to Bristol County Savings Bank, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, the information will be deleted. If you believe we might have any information from or about a child under 13, please contact us at marketing@bcsbmail.com.

GDPR

If you are a European Union resident, or are otherwise a data subject covered by the European Union's General Data Protection Regulation (GDPR) or similar laws in other countries, you may have certain

rights in relation to your Personal Information. Such rights may include the right to:

- Request access to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You may also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also may have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your Personal Information to you or to a third party. This enables you, or a third party you have chosen, to seek to have your Personal Information provided in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests in a timely manner. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify

you and keep you updated. We may also need to contact you about your request to verify your identity, confirm certain information, or clarify the request before we can fulfill the request. If you have an account with us and access to our Online Banking portal, we will deliver our written response to that secure account. If you do not have an Online Banking account with us or do not have access to our Online Banking portal, we will deliver our option.

If you are a European Union resident, or are otherwise a data subject covered by GDPR or a similar law and would like to exercise these rights or otherwise have questions about your rights please contact us using one of the following methods:

Email: legal@bcsbmail.com

Phone: 1.508.828.5365

Mail: Legal Department Bristol County Savings Bank 29 Broadway Taunton, MA 02780