# **Privacy Practices**

These privacy practices apply to users and visitors to the Vio Bank website and mobile application, and any online or mobile site or application (collectively "Site") owned or controlled by MidFirst Bank or any of its divisions (collectively, "MidFirst" or "we" or "us" or "our"), except MyMidlandMortgage.com, and describe generally how we collect, use and share personal information we obtain from, or about, users and visitors of the Site. If you are a California resident, please see the <a href="California Privacy Policy">California Privacy Policy</a> for additional information that applies to you.

#### Personal information we collect and where it comes from

Personal information generally means information that identifies you or your device, and other information we associate with it.

Information you voluntarily provide to us when you engage with the Site may include:

- Username and password
- Name
- Home or other address
- Email address
- Account numbers
- Limited location information
- Telephone number(s)
- For job applicants, resume and other application materials

Where it is required for business purposes, we may also request and collect:

- Payment card information,
- Social Security numbers,
- Driver's license number or a copy of your license (or comparable),
- Date of birth.
- Contact information for individuals bills you seek to pay online.
- A photograph of you.
- Fingerprint.
- Voice recording whenever you speak with customer service.

Information that is automatically collected when you visit or browse the Site, such as by our web servers or third-party analytics tools we use may include:

- IP address
- Network provider or mobile carrier
- Mobile or tablet device type
- Operating system

- Mobile app version
- Geographic location
- Screen resolution or other device settings
- Analytic information regarding usage
- We also gather information collected through cookies, tags and other technologies, as described further below

Information that is stored in your device that may be collected when you use a mobile application may include:

- Your geographic location
- Information contained in your contacts
- Camera/Photographs

Before collecting this information, you will be prompted to give the mobile application permission to collect this information. You may decline to provide this information. However, access to this information stored on your device is designed to simplify your user experience, improve our services and provide additional security to protect your account. You may update these permissions in your device's settings at any time.

Information from service providers such as advertising and joint marketing partners, and public databases may include:

- Name
- Home or other physical address
- Email address
- Telephone number

#### Other information

In addition to collecting personal information, we collect information that does not identify you and is not associated with your personal information. We may also de-identify or aggregate personal information so it no longer identifies you. Such information is outside the scope of this notice.

#### How we use personal information

In addition to those ways described above, we generally use personal information for the following purposes:

• Site management: including, to monitor the Site, to improve Site functionality and navigation, provide technical assistance, tailor the content displayed on the Site, address performance issues, improve search engine placement, and to perform analytics and market research.

- Security purposes: including to verify your identity, to maintain a secure session, authenticate you or your computer/device, to detect, prevent and investigate potential security incidents or fraud, and to verify transactions.
- Quality Assurance: including, for training purposes and quality assurance, to ensure our Site and customer services representatives meet the needs of our customers and other users.
- Marketing: including, to follow up on transactions you initiate, serve and tailor MidFirst ads (online and other channels) and other advertising displayed to you on third-party sites, offer financial solutions that match your interests and needs, and to allow you to participate in sweepstakes and promotions and to administer these activities.

We may also use personal information we believe to be necessary or appropriate for certain essential purposes, including:

- To comply with applicable law and legal process
- To respond to requests from public and government authorities, including authorities outside your country of residence
- To process job applications submitted to us
- To enforce our terms and conditions
- To protect our operations
- To protect our rights, privacy, safety, property, or security and/or that of you or others
- To allow us to pursue available remedies or limit the damages that we may sustain

# How personal information may be shared or disclosed

To the extent permitted by law, MidFirst may disclose your personal information:

- To our service providers, which may include services such as identity verification, fraud prevention, data analysis, website hosting and monitoring, payment processing, infrastructure provision, IT services, investment services, auditing services and other services, to enable them to provide such services;
- In connection with, or negotiation of, any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets (including in connection with any bankruptcy or similar proceedings);
- In connection with the essential purposes described above (e.g., to comply with legal obligations).

We may also disclose information, which is passively collected when you use the Site, to our online and email advertisers or other vendors, as described further in the cookies section below.

#### How we use cookies and similar technologies

#### Cookies

MidFirst uses cookies and similar technologies to operate the Site and provide you with products and services you may be interested in learning more about. In this notice, we refer to all of these technologies as "cookies". Cookies contain information about your internet usage that is stored directly on your device.

MidFirst uses cookies to track information that we use to determine advertising content and to track your activity on our Site (for example, what page of the Site you last viewed). MidFirst uses network advertisers, which may use their own cookies to serve you with ads on other websites. These cookies capture certain demographic and personal interest data, which may be used to determine the types of advertisements you see.

To learn more about your choices regarding the collection of your online activity, or to opt out of interest-based advertising, visit <a href="https://www.aboutads.info/choices">https://www.aboutads.info/choices</a>. If you choose to opt out, a cookie will be placed on your browser indicating your choice. Because cookies are stored by your browser, any opt-out election you make is valid only for the computer/device and browser combination used to opt out. If you opt out of interest-based advertising, please note that you may still receive advertisements from us, but they will not be customized based on your online activities, and you may still receive ads when you sign in to your online and mobile banking account. Clearing your browser's cookies will remove your opt out because it is stored in a cookie, and you will need to opt out again.

# **Blocking & deleting cookies**

Most internet browsers allow you to block cookies. If you block cookies on the Site, your browsing experience may be affected and you may not be able to use all of the features of the Site. You can delete cookies that are already stored on your computer or device by following the instructions associated with your browser and operating system.

#### **Google Analytics**

MidFirst uses Google Analytics to collect statistical and usage information related to the Site in order to continually improve the design and functionality, to monitor responses to our advertisements and content, to understand how account holders and visitors use the Site, and to assist us with resolving questions regarding the Site.

If you do not want Google Analytics to collect information about your website use, you can opt out by visiting <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> and following the instructions.

#### Do Not Track

MidFirst does not monitor or respond to Do Not Track signals because there is no standard interpretation or practice for DNT signals. Therefore, we handle all user information consistent with these Privacy Practices.

### Third-party sites

The Site may link to other websites or online services that are provided for your convenience. Once you leave the Site, the third party's online policy and privacy statement will determine what information is collected or shared. You should carefully review those materials to learn how third-party websites collect, use and share personal information.

#### Minors

MidFirst does not knowingly market or solicit personal information from children under 13 without parental consent, nor do we knowingly collect or share the personal information of children under 16 without their express consent.

# **Security**

We use technical, physical, and administrative security measures designed to comply with applicable law and protect the security of your personal information, including information you submit to us through the Site. This includes but may not be limited to device safeguards, encryption, and firewalls.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels (like email) to communicate sensitive or confidential information (such as your social security number) to us.

#### **Retention Practices**

MidFirst will retain records, including personal information, as needed to provide our products and services to you and as required by applicable laws and regulations. MidFirst may retain records beyond those required by applicable law and regulations where appropriate, including:

- for backup and disaster recovery systems in accordance with applicable policy; and
- for as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies

#### Other information collection and sharing practices

If we receive, obtain, or generate information about you in connection with providing you a financial product or service from us that is to be used primarily for personal, family or household purposes, our <u>Privacy Notice</u> provides additional information on how we collect, share and protect your personal information.

If you reside in California, please see our <u>California Privacy Policy</u> for additional information that pertains to you.

# Contact us

If you have questions about these privacy practices, please contact us at 888.643.3477.

*Version 1/1/23*