

# GBank Online Privacy Policy

Last updated November 22, 2024

Your privacy is important to us, and we are committed to protecting it through compliance with this Online Privacy Policy (the "Policy"). The terms "GBank", "we", "us", or "our" in this Policy refers to GBank and any banking or non-banking U.S. affiliates of GBank that refer or link to this Policy.

This Policy describes how we manage personal information about you when you interact with us online through our websites, mobile applications, and social sites ("site" or "the sites"), using your computer, smartphone, tablet, or other mobile device ("device" or "the devices"). We maintain our sites and provide services for your information and communication purposes, as well as for purposes associated with marketing, origination, and servicing of our products and services ("the service" or "services"). This Policy also explains how GBank collects personal information you provide when visiting, using, or interacting with us online, and through ads displayed through online services operated by us or non-affiliated third parties. In addition, this Policy explains how we may use or share personal information collected to provide our services to you and for advertising purposes.

Please read this document carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our sites. By using our sites, you agree to the terms and conditions of this Policy.

Our sites and services are intended for use only by United States residents while located in the United States. If you are not a United States resident or are located in a country other than the United States, you may not use our Sites or request and obtain services from us through the sites.

Additionally, if you are a California resident, you may have rights under the California Consumer Privacy Act (CCPA). Learn more about your [CCPA rights](#). A different privacy policy applies if you request or receive a financial product or service from us by using this site or other sites. See our [US Privacy Policy](#) for all bank products, except prepaid card. For the prepaid card see our [Privacy Policy for Prepaid Card](#). These disclosures provide our customers with more information about how we collect and disclose nonpublic personal information about them and other consumers who may request or receive a financial product or service from us.

We work with third party providers that are contractually obligated to comply with our policies for protecting information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy policies that apply to the third-party provider's site or mobile app to understand the specifics of how your online personal information may be collected, used, and shared.

# GBank's Online Privacy Practices

GBank is committed to transparency with your personal information. In some cases, we may ask for your express consent to use or disclose your personal information (for example, if we determine that your express consent is required or advisable under applicable law). Otherwise, when you use our site and services, you consent to the collection, use, and sharing of your personal information as described by this Policy, subject to applicable law and other notices we may have provided to you based on our relationship with you and based on the services you obtain from us using our sites or otherwise.

## 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 asset and income information;
- Account numbers (bank and loan numbers), credit and debit card numbers;
- 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 username, alias, PIN, passcode, and security questions and answers;
- Information from your computer and mobile devices where allowed by individual browsers and/or operating systems, such as:
  - Unique device identifiers (for example Media Access Control (MAC) and Internet Protocol (IP) addresses); and
  - Browser type, version, language, and display/screen settings;
- Information about how you use and interact with our sites and use our services (for example, activities on pages visited, links clicked or unique and measurable patterns such as keystrokes, mouse clicks, movements, swipes, and gestures);
- Responses to advertisements on the sites and mobile apps where we advertise;
- Log information, such as your search and voice to text queries using our sites;
- Search engine referrals;
- Geo-location information with consent (for example, ATM or financial center location, fraud prevention); and
- Social media preferences

# Personal Information We Collect

## **How do we collect personal information online?**

### Cookies and similar technologies

We collect personal information about you through your devices by using "cookies" and similar tracking technologies (including pixels or clear GIFs, tags, web beacons, and Flash objects). Cookies are text files containing tiny amounts of information that are downloaded to your devices when you visit a website. Tracking technologies may collect information about you and your use of our sites. Cookies allow a site or mobile app to recognize your device, keep track of pages visited, and remember your preferences. This information is used for security purposes, to facilitate navigation, to display information more effectively, and to personalize the user's experience. Cookies and similar tracking technologies are also used to gather information to improve website design and functionality and assist with resolving questions regarding our sites.

Cookies set by GBank, and cookies created and set by third party providers on our behalf are called "first-party" cookies. Cookies set by third-party providers, but not set on our behalf, are called "third-party" cookies. Information obtained from a third-party cookie can be used only for the purposes we have stated in our contracts with the third party. There can be first-party and/or third-party cookies within any of the categories of Cookies described below.

Cookies that expire at the end of a browser session are called "session cookies." Cookies that are stored longer are called "persistent cookies." There can be session and/or persistent cookies within any of the categories of Cookies below.

The sites we administer or control use cookies we consider necessary for our sites to function properly, which cannot be switched off in our system. These cookies are used to set your privacy preferences, gather geolocation data to prevent or detect potentially fraudulent activity, or for logging in a secured area requiring authentication. Geolocation cookies are only session cookies.

We will retain personal information collected through cookies for as long as needed or permitted by law considering the purpose(s) for which it was obtained. The criteria used to determine our retention period includes the purpose for which the personal information was collected, whether there is a legal obligation that applies to us, and whether retention is advisable considering our legal position, with respect to applicable statutes of limitations, litigation, or regulatory investigations.

We collaborate with certain third-party providers contractually required to comply with our policies to protect information. We may contract with a third-party provider who will support us through their sites. If you are on one of our sites and click a link to one of their sites, you will be presented with a notice explaining that you are continuing to a site we do not own. The third-party provider is solely responsible for cookies, cookie tracking, and your choices for managing cookies on its site. Please refer to the privacy policy and terms of use posted by the third-party provider for more information.

When we contract with a third-party provider to manage the content of the information within our sites, that provider is solely responsible for cookies, cookie tracking, and your choices for managing cookies.

Clear GIFs, pixel tags, or web beacons (i.e., one-pixel, transparent images located on a webpage or in an email or other message), or similar technologies may be used on our sites and in some digital communications (such as email). They may also be used when you are sent advertisements, or you interact with advertisements outside of our online environment. These are principally used to help recognize users, assess traffic patterns, and measure site or campaign engagement.

Local Shared Objects (or flash cookies) may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are like cookies in terms of their operation but may not be managed in your browser in the same way.

### Online Behavior Advertising (OBA)

When you are online you may see advertisements for GBank products and services including pre-screened offers of credit, or for products and services offered by third parties partnering with GBank. The advertisement displayed is determined using the information we, our affiliates, service providers, and other companies we partner with have about you, including information about your relationships with us (e.g., your account types, transactional information, and geolocation of your banking activity). When permitted by applicable law, we may share with others the information we collect from and about you as stated in this policy under 'Personal Information We Collect.'

OBA (also known as interest-based advertising) refers to the practice of collecting web-browser information from devices connected to the internet (e.g. computers, tablets, smart phones, and smart watches) regarding a user's browsing history across websites (including third-party non-affiliated websites) in order to develop a user profile (using analytical information) on the user's likes and interest in order to tailor and deliver advertisements based on those likes and interests. OBA is designed to deliver advertisements that are more likely to be of interest to you based on your web-browsing activities/history (e.g., the web pages you visit, your key word searches, the method you navigate our online services on your computer or device) or your personal profile (e.g., demographic or geolocation information). Certain companies we partner with may set up cookies and use related tracking technologies, such as detailed above, throughout our online services or in our communications to support these OBA efforts. If you do not want your information collected and used by the companies, we partner with for OBA purposes, you may opt out of this form of OBA by following the instructions in the next section.

### Opting Out of OBA

The primary method for opting out of OBA from certain GBank display ads on third-party websites is through the cross-industry [Self-Regulatory Program for Online Behavioral Advertising](#) managed by

the Digital Advertising Alliance (DAA). To opt out of OBA click on the following link and follow the instructions: <http://youradchoices.com>. Please note, since cookies are stored by your browser, if you use different browser types on your computer or multiple computers and/or devices that have browsers and you do not wish to have cookies collect information for OBA purposes, you must opt out of OBA from each browser on each of the computers and/or devices that you use. After opting out of OBA, you may still receive advertisements from us; however, they will not be customized based on your web-browsing activities on third-party websites.

#### Other means of collecting personal information

GBank also collects personal information that you provide when you visit or use our Sites and Services. This may occur when you apply for or open a new account, register for a new product or service, or request information about a product or service. We may also use third party providers to process personal information for business purposes on our behalf. These third-party providers are contractually required to keep this information confidential and to comply with our policies to protect the information we share with them, or they collect on our behalf. The personal information we collect is limited to what is required to provide our Services and to support legal, risk management and regulatory compliance requirements. For additional information, please review the "How We Use and Share Personal Information" section of this Policy.

## How We Use and Share Personal Information

### How do we use your personal information?

Personal information collected from and about you online described in this Policy may be used for many purposes, such as:

- Processing applications or transactions;
- Verifying your identity (including when accessing your account);
- Delivering products and services to you (to verify your identity when you access your account information, or when we process your applications or requests for prequalified offers, or to obtain our services using the sites or otherwise);
- Personalizing your digital and mobile experience by enhancing the organization and design of our sites and by analyzing data to create relevant alerts, products, or services;
- Providing personalized and unique marketing messages, and evaluating and improving our products and services (i.e., performing data analytics to develop and improve new and existing products and services);
- Providing advertising on our sites, as well as non-affiliated third-party sites and through off-line channels such as call centers and direct marketing (email, mail, and phone);
- Detecting and preventing fraud, identity theft and other risks to you or us;
- Performing analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view;

- Responding to your requests and communicating with you;
- Complying with and enforcing applicable legal requirements, industry standards, contractual obligations, and our policies;
- For accounting, auditing, testing, and internal function improvements;
- Allowing the use of features within our sites after access is granted to personal information from your device, such as contact lists, or geo-location, when certain services that require such are accessed (ex. locating an ATM);
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as an ongoing concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our site users and consumers are among the assets transferred; and
- For any other purpose we specifically disclose to you at the time we provide or collect your information.

We keep personal information as long as applicable law requires or allows and will use it for our legitimate business purposes. When we determine the personal information is no longer needed or we are no longer required or allowed to retain it, we will securely delete the personal information.

## With whom do we share your information?

Subject to other legal restrictions and notices you may receive from us based on our relationship with you, we may share the personal information we collect from and about you online described in this Policy:

- Among our affiliates and subsidiaries;
- With third-party service providers;
- To fulfill the purpose for which your personal information is provided;
- With other companies to deliver to you co-branded products, services, or programs you may have requested;
- To comply with any court order, law, or legal process, including responding to any government or regulatory request, subpoenas, to verify or enforce contractual terms or other rights; to address fraud or security issues; or to protect the rights, security, and/or property of the consumer
- With your consent;
- To conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as an ongoing concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our site users and consumers are among the assets transferred; and
- For any other purpose we disclosed when obtaining the personal information.

## Keeping Your Personal Information Accurate and Updated

Keeping your personal information accurate and up to date is particularly important. If your personal information is incomplete, inaccurate, or not current, access the Contact Us or similar option on our site or call us at the telephone number, or write to the appropriate address for changes that are listed on your account statement, records, online or other account materials.

## Linking To Other Sites

We may provide links to non-affiliated third-party sites, such as credit bureaus, service providers or merchants. If you follow links to any site that is not affiliated with or controlled by GBank, review their privacy and security policies and other terms and conditions, because the policies of those third parties may be different from those that apply to our sites and services. We do not guarantee and are not responsible for the privacy or security of these third-party sites or for the accuracy, completeness, or reliability of information found on those other sites

## Aggregated and De-identified information

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

## Persons Under 13 Years of Age

Our Site is not intended for children under 13 years of age. No one under the age of 13 is allowed to provide personal information on this site. We do not knowingly collect personal information from children under 13 without parental consent. If you are under 13, do not use or provide any information on this site or provide any information about yourself to us, including your name, address, telephone number, email address, screen name or username in use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information

## How to limit sharing

You have choices regarding the sharing of some personal information. Where appropriate, we will limit the sharing of your personal information based on your privacy choices. Industry standards are

currently evolving, and we may not respond to or take any action with respect to a "do not track" configuration set in your Internet browser.

## Social media

We may engage with customers and potential customers on social media platforms, such as Facebook®, Twitter®, YouTube® and LinkedIn®.

- Any content you post on official GBank managed social media pages, such as pictures, information, opinions, or any personal information made available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms.
- When interacting with official GBank social media pages, GBank's privacy notices and any applicable social media user terms and community guidelines may apply.
- Please review the privacy policy for the specific social media service you are using to better understand your rights and obligations regarding such content.

We may allow social share buttons on our sites that enable users to easily share information on social media platforms. The non-affiliated third parties that own these widgets may have access to information about your browsing practices on pages of our sites where these widgets are placed.

## Additional Information

### **Third party data sharing**

Some companies may offer aggregation websites and services that allow sharing of your data with them to consolidate your account information from various sources (such as your accounts with us or with other financial institutions), so you can view it in one location or perform actions related to your accounts using their services. To do this, a third-party may request authorization to access your GBank accounts by providing your GBank username and passcode or by providing your information-sharing consent directly to GBank. Use caution when using these third parties and keep the following details in mind if you choose to use these service providers:

- The third-party may access, on your behalf, detailed and personally identifiable information about you, your accounts, transactions, and relationship with us, and about the services you obtain from and through us;
- You should use caution and ensure the third party has appropriate policies and practices to protect the privacy and security of any personal information you provide or to which they are gaining access;
- Use of your information by the third party is governed by your agreement with them, not by any agreement you have with us;



- We are not responsible for the use or disclosure of any personal information accessed by any company or person to whom you provide your username and passcode;
- If you share your GBank username and passcode or other information about your accounts with others, we will consider your decision to share this information with others to mean that you have authorized any transaction or action that is initiated using the access information you provided;
- If you decide to revoke the authority you have given to a third-party, we strongly recommend you change your GBank passcode to ensure the third-party cannot continue to access your account.

## Updates To This Policy

This Policy may change sometimes, so please check it periodically for updates. If we make changes to this Policy, we will revise the "last updated" date at the top of this Policy. Any changes to this Online Privacy Policy will become effective when posted unless otherwise indicated. You are responsible for periodically reviewing this Policy to check for any changes. If we change the Policy on this site and you continue to use it, you agree that your continued use of the site will mean you have accepted all the changes described in our updated Policy.

## Protecting Your Personal Information

We use physical, electronic, and procedural security measures that comply with applicable federal and state laws to protect personal information from unauthorized access and use. Security measures may include device safeguards and secured files and buildings, as well as oversight of our third-party providers to ensure personal information remains confidential and secure.