

Blue Gate Bank - Online Privacy Policy

Effective January 23, 2017

BLUE GATE Bank (“we” and “us”) respects your desire for privacy and is committed to maintaining the confidentiality of your personal financial information. This document outlines our privacy policy for consumer visitors to our website (“Site”). If you are a consumer who has a continuing relationship with us, please see our Privacy Notice for additional details about our treatment of your personal financial information.

Visitors to Our Site. Visitors to our Site remain anonymous, unless they register for a service or otherwise elect to disclose their identity to us. Although we do not collect personally identifying information about persons who simply visit our Site, we do collect certain limited information about visitors, such as their IP address (a numeric address assigned automatically to computers when they access the Internet). We also may place “cookies” on a computer to track a visitor’s use of our Site. A cookie is a piece of data that is stored on your hard drive. It takes up very little room on your system and helps us to customize our Site and make its navigation easier for you. We sometimes use cookies to help estimate the number of visitors to our Site and to determine which areas are the most popular. Unless you register with us for a service (such as our online banking service), the cookie does not provide us with any personally identifying information about you, such as your name or address.

Our Collection of Information About You. We may collect nonpublic personal information about you in order to understand your needs, administer our business, process transactions, and provide you with products and services. We obtain nonpublic personal information about you from the following sources when you request or obtain services from us:

- Information we receive from you on applications or other forms (such as your name, address, social security number, assets and income);
- Information about your transactions with us or others (such as your account balance, payment history, parties to transactions, and credit usage); and
- Information we receive from a consumer reporting agency (such as your creditworthiness and credit history).

Our Disclosure of That Information. We may disclose information about you, your accounts and transactions: (a) where it is necessary or helpful to effect, process or confirm your transactions; (b) to verify the existence, history and condition of your account for credit reporting agencies; (c) to comply with legal process, such as subpoenas and court orders; (d) to law enforcement authorities if we believe a crime has been committed; (e) if you give us your consent; and (f) as otherwise permitted by law.

We do not disclose nonpublic personal information about our current or former customers to others, except as set forth in our Privacy Notice.

Online Activity. There are a number of third parties (e.g., social media companies and advertising networks) that may build profiles based on your browsing activity across one or more websites over time. That information may be used, among other things, to target specific advertisements to you. If a third party cookie or similar tracking device is placed on your computer by one of these companies, it may be able to collect information about your browsing activity at our Site. In addition, our Site may contain advertisements, tools, or other services provided by third parties that may collect information about your online browsing activities over time and across different websites. We do not share non-public personal information about you except in accordance with these terms and our Privacy Notice.

Your internet browser may contain tools to request that websites not track your online activities. Industry standards for this technology are evolving and we currently do not respond to or take any action with respect to the “do not track” settings in your internet browser.

State Rights. Depending on where you live, you may have additional privacy protections under some state laws. For example, certain state laws may restrict the types of information we may disclose about you, limit the parties with whom we may share such information, or require us to provide you with additional notices or opt-out rights. We will comply with applicable state laws before sharing nonpublic personal information about you. We may do this by sending a separate notice of those rights to you.

Maintaining Accurate Information. We have procedures in place that help us to maintain the accuracy of the personally identifiable information that we collect. Please contact your branch of account or call our customer service at (714) 551-5448, if you believe that our information about you is incomplete, out-of-date, or incorrect. If you are an online banking customer of ours, visit our Site at www.bankbluegate.com to review and correct information about yourself, such as a change in your name, address or e-mail address.

Information Security. We restrict access to nonpublic personal information about you to those employees who have a need to know such information (e.g., to process your transactions or provide services to you). We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Links to Other Websites. Our Site may feature links to third party websites that offer goods, services or information. Some of these sites may appear as windows-within-windows at this Site. When you click on one of these links, you will be leaving our Site and will no longer be subject to this policy. We are not responsible for the information collection practices of the other websites that you visit and urge you to review their privacy policies before you provide them with any personally identifiable information. Third party sites may collect and use information about you in a way that is different from this policy.

Services and Advertisements by Third Parties. Third parties may offer services from time to time at our Site. If you provide them with information, their use of that information will be subject to their privacy

policy, if any, and will not be subject to this policy. If you accept third party goods or services advertised at our Site, the third party may be able to identify that you have a relationship with us (e.g., if the offer was only made through our Site).

Minors. We feel strongly about protecting the privacy of children and teenagers. As such, we do not knowingly collect personally identifiable information from minors through our Site.

Changes to this Policy. We may add to, delete, or change the terms of this Online Privacy policy from time to time by sending you a notice or posting a notice of the change (or an amended Online Privacy policy) at this Site. If required by law, we will send you a notice of the change. Your continued use of our Site or any online service following notification will constitute your agreement to the revised Online Privacy policy.

Questions. If you have any questions regarding this Online Privacy policy, you can call us at (714) 551-5454.