

# Online Privacy Policy

## Introduction

At Innovative Card Solutions, we understand the importance of protecting your privacy and safeguarding your personal information online. This policy provides a summary of our online privacy practices, covering the online collection, use and disclosure of information collected from visitors to our websites and mobile banking applications, herein referred to as "Websites". Please also refer to our Consumer Privacy Policy for additional information regarding other general privacy practices and your privacy rights.

## The Information We Collect

We may collect both "Customer Information" and "Aggregate Customer Information" from visitors to our Websites. The term "Customer Information" means information that can identify a specific customer or be identified back to a specific customer. The term "Aggregate Customer Information" is a compilation of information that does not identify a specific customer, such as date and time of visit, IP addresses, demographic information, Website pages visited, or the browser used.

## Your Customer Information

Customer information collected may include data such as name, address, email address, phone number, Social Security number, date of birth, driver's license, employer, and account data.

## Aggregate Customer Information

We collect Aggregate Customer Information for a variety of purposes, including using it to enhance your online customer experience. For example, collection of Aggregate Customer Information enables us to gather and store information such as domain and browser information. This information allows us to measure traffic on various sections of our Website, monitor performance, and respond to customer needs. We may share "Aggregate Customer Information" with selected third parties, such as tracking product promotions, but this information will never identify you individually as a customer or include your personal identifying information.

## Technology We Use on Our Websites

We are always working to make your online experience the best available. Various tools and techniques are used to gather and analyze website visits and sessions. One of the ways we gather information about customer visits is through cookies. Cookies are electronic files recorded by your browser that retain information about your Website visits on your computer's hard drive. We use cookies to record information on customers' visits and use of our Website in order to administer and improve our Website. We do not use cookies to store or transmit any personal identifying information. Temporary "session" cookies are also used to facilitate customer navigation within our Site during their visit. "Session" cookies are deleted once you close your Internet browser. We may also use "persistent" cookies that are retained on your computer after your visit ends so we can identify your preferences and enhance your next visit to our Website.

In addition, cookies help us manage and monitor Internet traffic from third-party websites to ours as well as which areas of our Website are used most often and for how long. We may provide this type of Aggregate Information to non-affiliated application service providers that compile statistical or other information for us. This feedback and analysis allows us to continually update our Website.

You can block cookies by changing the settings on your Internet browser or using software programs specifically designed to block cookies. You should be aware that by blocking cookies or using certain security software settings that these actions may prevent you from logging onto your accounts or limit your online activities.

In addition to cookies, we may also use other technology such as "pixel tags," "clear GIFs," or similar tools. A Pixel Tag is an electronic image, often a single-pixel (1x1), which is ordinarily not visible to visitors and may be used with cookies. These tools can be used to collect data, like cookies, regarding your operating system, browser, screen resolution, and other technical information, as well as navigation and session information. This information is anonymous and does not include identifiable customer or personal information. Again, this data is used to continually improve our Website and your visits.

## **Use of Customer Information**

We use information provided by Website visitors consistent with their actions (such as applying for a product or service, opening accounts, requesting information, assisting in completing transactions, or for employment inquiries and applications) and with other disclosures and agreements on our Website. We may aggregate individual visitor or customer information for further analysis.

## **Disclosure of Customer Information**

We may disclose customer and visitor information, as permitted by law, and: (1) consistent with our privacy notices and other account disclosures; (2) to comply with applicable laws; (3) to respond to governmental inquiries or requests; (4) to comply with legal processes; (5) for security purposes and to protect our customers, Website, brand, or other Innovative Card Solutions legal interests.

## **Email Choices**

Under various federal and state laws and regulations, customers and visitors may choose not to receive promotional email or electronic newsletters from us by following the "unsubscribe" or "remove" instructions in the specific email from which they wish to opt-out. Customers also have additional opt-out rights as described in our Privacy Policy. Even if you opt-out of receiving promotional emails from us you may still receive transactional messages regarding your account.

## **Children's Online Privacy Protection Act Information**

This Website is not directed to children. We do not market to children, nor do we knowingly collect or retain personally identifiable information from children.

## Security Practices

We are committed to ensuring that your personal information is secure. In order to prevent unauthorized access or disclosure, we have implemented strong physical, electronic and managerial procedures to safeguard and secure the information that we gather, transmit, and store in connection with our Website. In addition, whenever we collect personal information via the Website, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the Website.

Remember to educate yourself on scams and threats and to maintain your computer operating system and data security software up to date. We will never request that you provide, update or verify via email your personal or account information, including passwords, Social Security Number and PIN(s). If you receive such an email request, please email us at [onlinesecurity@weareics.com](mailto:onlinesecurity@weareics.com) immediately.

## Third-Party Web Linking Practices

We may partner with reputable third-party companies to help provide additional products and services or information to you online. These third parties are always subject to a detailed evaluation process to review their relevant business practices; however, they may have different online disclosures, including security and privacy practices, than Innovative Card Solutions. Accordingly, when we link you to a third-party website using a hyperlink, we will notify you that you are leaving a Website under our direct control and subject to our policies, so that you can review their respective disclosures and policies.

In some cases we may also enter into co-branded relationships with other parties on the Internet to offer you additional products, services, or information. These co-branded websites may also use a hyperlink, and disclose they are "brought to you by," "powered by," "provided by," or contain another company's logo. In these circumstances our online disclosures, including security and privacy practices, still apply.

## Effective Date and Policy Changes

This Online Policy is effective as of January 1, 2017. We reserve the right to change or amend this Online Privacy Policy at any time. Changes will be effective as of posting to the Website.