

Digital Privacy Notice

TouchBanking – powered by Fiserv – helps you manage your money, view your transactions and accounts, making it easy to manage your finances on the go.

TouchBanking provides the “Services” to users on behalf of their financial institution (“First National Bank of Broken Arrow”) (FNBBA) as a service provider. This Privacy Notice, in combination with relevant privacy policies that FNBBA provides to you (e.g., pursuant to financial privacy laws), informs you of the practices regarding the collection, use and disclosure of any personal information that TouchBanking collects from or about users in connection with our mobile application (the “Services”).

Depending on the services offered by FNBBA TouchBanking may allow you to:

- get real-time balances for your accounts
- manage your money
- view your transactions and statements
- make transfers
- pay your bills and manage billers
- pay other people
- deposit a check
- locate branches and ATMs
- receive alerts

THE TYPES OF INFORMATION TOUCHBANKING COLLECTS

TouchBanking may collect personal information from you in the following ways:

(a) Personal Information You or FNBBA Provides to us.

- TouchBanking may collect personal information from you or FNBBA, such as your first and last name, address, e-mail, User IDs, telephone number, and social security number when you open a new financial account or register for other financial services. Device images/videos may be accessed when you deposit a check or use a QR code to make

peer to peer payments using Zelle or other payments functionality. Device contacts may be accessed when you to make peer to peer payments using Zelle or other payments functionality. Device location may be accessed to detect and prevent card transaction fraud, deposit fraud and also to provide branch and atm locations.

- TouchBanking may collect the financial and transaction information necessary to provide you with the Services, including account numbers, payment card expiration date, payment card identification, verification numbers, and transaction and payment history.
- If you provide feedback or contact TouchBanking via email, TouchBanking will collect your name, email address and any other content included in your email messages to us in order to send you a reply.
- TouchBanking also collects other types of personal information that you provide voluntarily, such as any information requested by TouchBanking if you contact TouchBanking via email regarding support for the Services.

(b) Personal Information Collected from Third Parties. TouchBanking may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, in order to provide some of our Services.

(c) Personal Information Collected Via Technology. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications and other online services, such as:

- Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

- Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, TouchBanking will collect your location information when you use the Services; for example, to provide our fraud detection services. If you do not want TouchBanking to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

DISCLOSURE OF YOUR PERSONAL INFORMATION

TouchBanking discloses your personal information as described below.

(a) At the Direction of FNBBA. TouchBanking may share your information with FNBBA or with third parties at the direction of FNBBA. Other than as described in this Privacy Notice in connection with the Services, this Privacy Notice does not apply to the processing of your information by FNBBA or third parties with whom TouchBanking shares information at FNBBA's direction.

(b) Third Party Service Providers. TouchBanking may share your personal information with third party or affiliated service providers that perform services for or on behalf of TouchBanking, for the purposes described in this Privacy Notice, including: to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the Services; to provide technical support; and/or to provide other services to TouchBanking.

(c) Corporate Restructuring. TouchBanking may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction involving the sale, transfer, divestiture, or disclosure of all or a portion of TouchBanking's business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If TouchBanking's company, business or assets is acquired by another company, that company

will possess the personal information collected by TouchBanking and the company will assume the rights and obligations regarding your personal information as described in this Privacy Notice.

(d) Authorities and Others. Regardless of any choices you make regarding your personal information, TouchBanking may disclose your personal information to law enforcement, government authorities, and private parties, for the compliance and protection services described above.

LINKS TO OTHER SITES

The Services may contain links to third party websites. When you click on a link to any other website or location, you will leave the Services and go to another site and another entity may collect personal and/or anonymous information from you. TouchBanking's provision of a link to any other website or location is for your convenience and does not signify TouchBanking's endorsement of such other website or location or its contents. TouchBanking has no control over, does not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Notice do not apply to these outside websites. We encourage you to read the privacy notice of every website you visit.

YOUR CHOICES REGARDING YOUR INFORMATION

You have several choices regarding use of information on the Services.

(a) How We Respond to Do Not Track Signals. Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communications. There is currently no standard that governs what, if anything, websites should do when they receive these signals. TouchBanking currently does not take action in response to these signals. If and when a standard is established, TouchBanking may revise its policy on responding to these signals.

(b) Access, Update, or Correct Your Information. You can access, update or correct your information by changing preferences in your account. To do so, you should contact FNBBA. For additional requests, please contact FNBBA on whose behalf we are providing the Services to you.

(c) Opting Out SMS Communications. If you provide your phone number through the Services, TouchBanking may send you notifications by SMS, such as provide a fraud alert. You may opt out of SMS communications by unlinking your mobile phone number through the Services.

(d) Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to TouchBanking's collection of location information, you may no longer be able to use some features of the Services.

SAFEGUARDS AND RETENTION

We implement reasonable administrative, technical and physical measures in an effort to safeguard the information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information.

Federal laws and regulations require that US financial institutions retain original, active and historical records. Your personal and financial data will be retained for a period of five to ten years, depending on applicable laws, regulations and legitimate business needs.

A NOTE ABOUT CHILDREN

The Services are not directed towards individuals under the age of 18, and TouchBanking does not intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to TouchBanking and TouchBanking learns that the personal information is the information of a child under 18, TouchBanking will attempt to delete the information as soon as possible.

PRIVACY NOTICE UPDATES

This Privacy Notice is subject to occasional revision. FNBBA or TouchBanking may notify you, in their sole discretion, of any material changes in TouchBanking's collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Notice will be effective thirty (30) calendar days following notice of the changes on

the Services or immediately where no notice is given. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify TouchBanking prior to the effective date of such changes that you wish to deactivate your account. Continued use of the Services following notice of any such changes (or use of the Services after any such changes) shall indicate your acknowledgement of such changes.

CONTACT TOUCHBANKING

If you have any questions or complaints about this Privacy Notice or TouchBanking's data collection or processing practices, or if you want to report any security violations to TouchBanking, please contact TouchBanking by at: dpo@fiserv.com; or by mail at:

Fiserv, Inc.
255 Fiserv Drive
Brookfield, WI 53045
PO Box 979
Brookfield, WI 53008-0979