

Highland Bank Privacy Policy

This Privacy Practices Policy ("Policy") applies to use of online services offered, owned or controlled by Highland Bank ("Bank", "we", "us", or "our"), including, but not limited to, our website and mobile applications. Bank's Online Services are intended for United States users only.

This Policy describes how we may collect, share and use information about you based on your interaction with our online sites, mobile applications, online advertisements, third-party websites and Bank-branded social media sites (collectively, "Online Services") and the choices you can make about how your information is collected and used. This Policy applies to information collected when you use our Online Services. By using or accessing our Online Services, you confirm your agreement to the terms and conditions of this Policy in effect at that time and consent to our use of cookies and similar technologies.

As you review this Policy, please keep in mind that:

- Personal information that you share on any Bank-managed social media pages, such as Facebook, are subject to the privacy policies and terms of use of those platforms. You should review those policies before posting any content to those pages. You should not share personal information through public social media pages.
- Our Online Services are not intended for children under the age of 13. We do not knowingly collect personal information from individuals under the age of 13 without parental consent. To learn more about the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission's website at <https://www.ftc.gov>.

What Information We Collect:

- **Personal Information.** We collect personal information that you provide when opening an account, applying for a loan, and requesting services such as a wire transfer. This information may include your name, mailing or email address, telephone number(s), account number(s), financial information, and other personal information you may provide. If you have a financial product or service with us for personal, family or household purposes, we will share and use information we collect from or about you in accordance with our Privacy Notice available on our website.

How We Collect Information: We collect information through various means, including the information you provide directly to us on applications, service requests and information collected through third parties such as credit reporting agencies.

How We Use Information: The information we collect from and about you is used to improve your service and experience with us. We may use your information to:

- Process your requests, transactions, applications and inquiries;
- Verify your identity;

- Allow you to apply for products or services (e.g., to prequalify for a mortgage, open a checking account or other financial product) and evaluate your eligibility for such products or services;
- Provide you with updates on your accounts, products and services, such as changes to terms, conditions or policies;
- Inform you about important information regarding products or services for which you apply or may be interested in applying for, or in which you are already enrolled;
- Deliver advertising to you;
- Allow you to access your online account;
- For risk control and for fraud detection and prevention;
- Provide you with personalized offers and customize your experience with us, and/or
- Comply with applicable legal requirements.

How We Share Information: If you are a Bank customer, we may share personal information that we collect about you with our service providers and non-affiliates in accordance with our Privacy Notice available on our website.

- **Service Providers.** We may disclose certain personal and non-personal information we collect from your use of our Online Services to companies that perform services on our behalf, including those who assist us in processing transactions, preparing and mailing statements and responding to user inquiries. In addition, we may disclose that information to service providers that perform marketing services for us.
- **Non-Affiliates.** We may disclose information about you to non-affiliates as required or permitted by law, such as to comply with a subpoena, respond to inquiries from government authorities or defend legal actions.

Protection of Customer Personal Information: To protect personal information from unauthorized access and use, the Bank uses security measures that comply with federal law. These measures include computer safeguards, secured files, and secured buildings.

The Bank also maintains physical, electronic, and procedural safeguards to protect this information and access to information is limited to those employees for whom access is appropriate.

Ability to Limit Sharing: Consumer customers will be provided the ability to limit our sharing of their personal information for joint marketing purposes.

- Consumer customers can opt-out of our ability to share information by
 - 1) calling 1.877.457-1305, or
 - 2) visit us online at <https://highland.bank/information-security-policy/privacy-policy/> and click on the link to opt-out, or
 - 3) by downloading our Privacy Notice, complete the form and mail it to us at the address provided.

How to Protect Your Personal Information: It is important that you protect your personal information. We will never request personal information, such as Social Security Number, account numbers, PINs or passwords by email, phone calls or texts. If you receive an email, call or text message that appears to be from us asking for your personal information, please contact us immediately at 1.877.457.1305 to report the suspicious activity.

Policy Updates: If we make updates to this Policy, we will revise the Policy and the "Date Last Updated" posted at the bottom of this Policy. Updates are effective as soon as they are published. Your use of our services following any updates is your acceptance of the updated Policy.

Contact Us: If you have any questions about this Policy or our Services, please contact us at 1.877.457-1305.