

# Privacy Policy

**Why?** Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**What?** The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Account balances
- Payment history
- Credit history
- Overdraft History
- Checking Account Information

When you are no longer our customer, we continue to share your information as described in this notice.

**How?** All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Legacy Bank / Clinch Valley Bank chooses to share; and whether you can limit this sharing.

## Reasons we can share your personal information

For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or

## information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also maintain other physical, electronic and procedural safeguards to protect this information and we limit access to information to those employees for whom access is appropriate.

## How does Legacy Bank collect my personal information?

We collect your personal information, for example, when you:

- Open an account
- Give us your contact information
- Pay us by check
- Give us your wage statements
- Provide your mortgage information
- We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

## Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

## DEFINITIONS

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

## Error Resolution Notice

1. **Affiliates:** Companies related by common ownership or control. They can be financial and non-financial companies.
2. **Non-affiliates:** Companies not related by common ownership or control. They can be financial and non-financial companies.
3. **Joint Marketing:** A formal agreement between non-affiliated financial companies that together market financial products or services to you.

# Legacy Bank Privacy Policy for Mobile Banking

## Adopted: December 14, 2021

**TouchBanking** (the “App”)– powered by Fiserv – helps you control your credit and/or debit cards through your mobile device, making it easy to manage your finances on the go.

The App allows you to:

- make transfers
- pay your bills and manage billers
- deposit a check
- receive alerts
- manage cards

This Privacy Policy, in combination with other relevant privacy notices that we provide to you (e.g., pursuant to financial privacy laws), inform you of the policies and practices regarding the collection, use and disclosure of any personal information that we and our service providers collect from or about users in connection with the App's website and mobile application (the "Services").

## THE TYPES OF INFORMATION WE COLLECT IN THE APP

Through your use of the Services, we may collect personal information from you in the following ways:

### (a) Personal Information You Provide to Us.

- We may collect personal information from you, such as your first and last name, address, e-mail, telephone number, and social security number when you create an account.
- We will 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 us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.

(b) Personal Information Collected from Third Parties. We 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, the website you visited before browsing to the Service, 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.
- Local storage technologies, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.

- Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, we will collect your location information when you use the Services; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

#### **HOW WE USE YOUR INFORMATION COLLECTED IN THE APP**

(a) General Use. In general, we use your personal information collected through your use of the Services to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. We use your personal information, in connection with the App, in the following ways:

- facilitate the creation of, and secure and maintain your account;
- identify you as a legitimate user in our system;
- provide improved administration of the Services;
- provide the Services you request;
- improve the quality of experience when you interact with the Services;
- send you administrative e-mail notifications, such as security or support and maintenance advisories; and
- send surveys, offers, and other promotional materials related to the Services.

(b) Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;

requirements and internal policies;

- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

(c) Creation of Non-Identifiable Data. The App may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties in our discretion.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We disclose your personal information collected through your use of the Services as described below.

(a) In Accordance with Our Other Privacy Notices. Other than as described in this Privacy Policy in connection with the App, this Privacy Policy does not apply to the processing of your information by us or third parties with whom we share information.

(b) Third Party Service Providers. We may share your personal information with third party or affiliated service providers that perform services for or on behalf of us in providing the App, for the purposes described in this Privacy Policy, including: to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the



(c) Authorities and Others. Regardless of any choices you make regarding your personal information, The App 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 App may contain links to third party websites. When you click on a link to any other website or location, you will leave the App and go to another site and another entity may collect personal and/or anonymous information from you. The App's provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other website or location or its contents. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites. We encourage you to read the privacy policy 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 communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we 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. For

receive our email marketing communications, you can unsubscribe any time by clicking the “unsubscribe” link included at the bottom of the email or other electronic communication. Alternatively, you can opt out of receiving marketing communications by contacting us at the contact information under “Contact Us” below. If you provide your phone number through the Services, we 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 our collection of location information, you may no longer be able to use some features of the App.

## **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.

## **A NOTE ABOUT CHILDREN**

The Services are not directed towards individuals under the age of 18, and we do not, through the App, intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to us through the App and we learn that the personal

## PRIVACY POLICY UPDATES

This Privacy Policy is subject to occasional revision. We will notify you of any material changes in its collection, use, or disclosure of your personal information by posting a notice on the Services. Any material changes to this Privacy Policy will be effective thirty (30) calendar days following notice of the changes on the Services. These changes will be effective immediately for new users of the Services. If you object to any such changes, you must notify us 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 shall indicate your acknowledgement of such changes.

## CONTACT US

If you have any questions or complaints about this Privacy Policy or The App's data collection or processing practices, or if you want to report any security violations to The App, please contact The App by email at:

**khill@mylegacybank.net**; or by mail at: Legacy Bank PO Box 2080 Grundy, VA 24614.

# Need more information?

