DIGITAL BANKING PRIVACY POLICY

This Digital Banking Privacy Policy, in combination with other relevant privacy notices that we provide to you (e.g., pursuant to financial privacy laws), applies to information that Rollstone Bank & Trust ("Rollstone Bank & Trust", "us", "we" and "our") collects about our customers and other visitors ("you" and "your") when you interact with us via online banking or our mobile application ("digital channels"). This Policy describes our 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 our digital channels.

By using our digital channels, you agree to the terms and conditions of this Policy.

Types of Information We Collect

1. We collect personal information that you provide to us when you visit our digital channels, such as when you apply or register for our products and services, communicate with us, respond to surveys, enter contests or promotions, or link external accounts using our account aggregation tool. We also collect personal information from your computer, smartphone, and mobile device.
2. Our digital channels may request access to data located on the device. This may include biometrics, camera, contacts, and location data. You will be prompted to allow access to this data. When access is not granted, the feature requiring that data may not be fully functional.
3. We may use third party service providers to process personal information on our behalf. Our service providers are contractually obligated to comply with our policies to protect information we share with them or that they collect on our behalf.
4. Through your use of our digital channels, personal information we collect may include:

    a. Contact and identity information, such as name, address, mailing address, email address, phone number, date of birth, social security number, username and password, and other information that directly identifies you.
    b. Third Party information from identity verification services and consumer reporting agencies, including credit bureaus.

c. Account-related information, such as account number, debit card number, account balances, account history, information about beneficiaries and joint account holders, and other information related to your Rollstone Bank accounts and third-party accounts you link using our account aggregation tool.
d. Transaction information, such as debit card purchases, payment, transaction history, third party billing information, and other transaction details.
e. Information from your computer, smartphone, or other mobile device, such as:

    i. Device data including device type, manufacturer & model, mobile device carrier and radio/network information (e.g. Wi-Fi, LTE, 3G)
    ii. Unique device identifiers including IP addresses
    iii. Browser type, version, language, and display/ screen settings
    iv. Information about how you use and interact with our Digital channels (e.g. page visited or links clicked)
    v. Responses to advertisements on the digital channels where we advertise
    vi. Log information such as your search queries in the mobile app
    vii. Search engine referrals viii. Geo-location information, with your consent, such as city, state or geographic area (e.g. branch/ATM locator tool, fraud prevention)

5. Cookies, which are text files that digital channels 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.
6. Local storage technologies, like HTML5 and Flash, provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
7. Web beacons, also known as pixel tags or clear GIFs, are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
8. Location Information: If you have enabled location services on your phone and agree to the collection of your location when prompted by the digital channel, we will collect location data when you use the digital channel even when the app is closed or not in use; 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

1. Personal Information we collect from and about you through your use of our digital channels may be used for many purposes, such as:

    a. Delivering products and services, such as processing applications, processing transactions, consolidating financial account information in our account aggregation service, and locating our nearby branches and ATMs;
    b. Detecting and preventing fraud, identity theft and other risks to you and Rollstone Bank. Personalizing your digital experience by enhancing the overall digital channel organization and design and sending you relevant alerts via text, email, or push notifications;
    c. Advertising and marketing, such as providing offers and products for products and services via mail, email or phone, displaying online advertising, targeting our offers or promotions, conducting marketing research, and evaluating or improving the effectiveness of our marketing efforts;
    d. Performing analytics concerning your use of our Digital Banking services, including your responses to our emails and the pages and advertisements you view;
    e. Complying with and enforcing applicable legal requirements, industry standards, contractual obligations and Rollstone Bank policies;
    f. We retain personal information for as required by laws and regulations and the necessary business purpose

Disclosure of Your Personal Information

We may share personal information we collect with our affiliates, service providers, marketing partners, credit bureaus, government authorities as required by laws and regulations, and third parties with whom you authorize or direct us to share your information. We may also share aggregated and/or de-identified information (i.e. where information that identifies you personally has been removed or obscured) with third parties for any purpose.

Links to Other Digital Channels

Rollstone Bank's digital channels may contain links to third party sites. When you click on a link to any other website or location, you will leave our digital channels and go to another site, and another entity may collect personal and/or anonymous information from you. The digital channel's provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other websites or location or its contents. We have no control over, do not review, and cannot be responsible for, these outside sites

or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside sites. We encourage you to read the privacy policy of every site you visit.

Online Tracking

Some web browsers transmit “do not track” signals to sites you visit and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, sites should do when they receive these signals. We currently do not act in response to these signals. When a standard is established, we may revise our policy on responding to these signals.

Your Choices Regarding Your Information

You have several choices regarding use of your personal information.

a. Email addresses:

If you provide us with an email address, we may send you emails with information on new products or services or other marketing materials. If you do not wish to receive such emails, you may unsubscribe from future emails by clicking the “unsubscribe” link that is included in every marketing email. If you choose to unsubscribe from marketing emails, we may still send you emails about your accounts or for other non-marketing purposes.

b. Phone numbers:

If you supply us with a phone number online, you may receive calls from us. If your phone number is listed on the National “Do Not Call Registry”, we will not call you for marketing purposes unless you have an existing business relationship with us. If you opt out of marketing calls, we may still call you about your accounts or for other non-marketing purposes.

We may also send you notifications by SMS (text), such as to provide you with a fraud alert. You may opt out of SMS communications by unlinking your mobile phone number through service settings.

If you initially consented to the collection of geolocation data through our mobile banking application, you could 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 application.

Keeping Your Information Secure

1. To protect your personal information from unauthorized access and use, we implement security measures that comply with applicable federal and state laws. These measures may include encrypting files, multi-factor authentication, maintaining internal physical and technical security controls, and oversight of our third-party service providers to ensure personal information remains confidential and secure.

2. You can help maintain the security of your banking information by not sharing your username or password with anyone, by changing your password regularly, and by remembering to sign-off.

Under Age 18

1. We do not knowingly solicit data from children under 18, and we do not market online products or services to children. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents.
2. If a child under 18 submits personal information to us through digital channels and we learn that personal information is the information of a child under 18, we will attempt to delete the information as soon as possible.

Privacy Policy Updates

1. This Privacy Policy is subject to occasional revision. We may amend this Policy at any time by posting a revised version on the digital channels. The revised version will be effective immediately at the time it is posted unless a delayed effective date is expressly stated therein. You may (on our discretion) also be provided with email notification of such amendments. You may (in our discretion) be required to affirmatively acknowledge or accept the revised Privacy Policy to continue use of digital channels. Any use of the digital channels after a notice of change will constitute your express agreement to such changes.

Contact Us

If you have any questions about this Digital Banking Privacy Policy or Rollstone Bank & Trust's data collection practices, please contact us by email at: ServiceCenter@RollstoneBank.com or by telephone at: 800.640.1166.