



## **ONLINE PRIVACY POLICY**

Approved: 4/14/2020

## Privacy and Security

This privacy policy applies to the website (a Site) operated by American Bank & Trust, referred to as “American Bank & Trust” herein.

If you would like to review how we treat your private information, click here for our Privacy Policy (PDF).

## Website Visitors

When you visit American Bank & Trust’s website or use our Apps, we may collect anonymous Site Visit Information or personal information (or both) from and about you. In general, we use the information we collect to provide our services, respond to your requests and to enhance the quality of our Sites and our Apps. We may use standard software to collect non-identifying information about our visitors that web browsers and servers typically make available, such as: browser type, operating system, language preference, referring site, the date and time our Site was accessed, and IP address (a numeric address given to servers connected to the Internet).

Visitors may elect to provide us with personal information via E-mail or our online registration forms. American Bank & Trust also collects potentially-personally identifying information like Internet Protocol (IP) addresses. These are non-personally identifying in and of themselves but could be used in conjunction with other information to personally identify users. American Bank & Trust’s purpose in collecting this information is to better understand how visitors use its website and may share potentially-personally identifying information with its employees, contractors, and service providers. American Bank & Trust will not release potentially-personally identifying information except under the same circumstances as American Bank & Trust releases personally identifying information.

American Bank and Trust uses the collected information in the following ways:

- To respond to your inquiries and fulfill your requests;
- To inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- To deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- To allow you to apply for products and services and evaluate your eligibility for such products or services;
- To verify your identity in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and personal information;
- To allow you to participate in surveys or other forms of market research, sweepstakes, contests and similar promotions and to administer these activities;
- Information collected through our social media pages and other online interaction with you to assist in verifying your identity and account status. We may combine this information with information collected from offline sources or information we already have;
- For business purposes, including data analysis, audits, developing and improving products and services, enhancing the Site, identifying usage trends and determining the effectiveness of promotional campaigns;
- For risk control, fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.

## Cookies

Some areas of our Site may use a “cookie” temporarily stored in the visitor’s computer memory (RAM) to allow the web server to log the pages you use within the Site and to know if you have visited the Site before. In our efforts to deliver relevant digital advertising to you, American Bank & Trust uses Cookies to identify and track visitors, their usage of American Bank & Trust’s website, and their website access preferences across multiple requests and visits to the Site. Cookies are used in web analytics to determine usage patterns through our own internal analytics software or by sending this information to a third-party service provider to help American Bank & Trust to analyze the data. American Bank & Trust has agreements with its third-party service providers that they will not share this information with others or use the information for purposes other than to maintain the services they provide to American Bank & Trust. It is possible to link Cookies to personally identifying information, thereby permitting website operators, including our third-party analytics providers, to track the online movements of particular individuals. Visitors to the Site who do not wish to have Cookies placed on their computers by American Bank & Trust, its contractors, or third-party service providers should set their browsers to refuse Cookies before linking to the Site.

## Children’s Online Privacy Protection Act (COPPA)

The Children’s Online Privacy Protection Act (COPPA) was passed to give parents increased control over what information is collected from their

children online and how such information is used. The law applies to websites and services directed to, and which knowingly collect information from, children under the age of 13. American Bank & Trust's website and online services are not directed to children under the age of 13, nor is information knowingly collected from them. For additional information on COPPA protections, visit the Federal Trade Commission website.

## California Online Privacy Protection Act (CalOPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy.

According to CalOPPA we agree to the following:

- Users can visit our site anonymously.
- Once this Privacy Policy is created, we will add a link using the word 'Privacy' to it on our homepage or as a minimum on the first significant page after entering our website.
- Users will be notified of any privacy policy changes: On our Privacy Policy Page.
- Users are able to change their personal information: by logging into their account.

## California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act ("CCPA") grants California residents ("consumers") or another person authorized to act on behalf of the consumer, the right to:

- Know what personal information American Bank & Trust has collected about you during the prior twelve months;
- Know whether American Bank & Trust sells your personal information, and if so, to whom;
- Give or withhold consent for American Bank & Trust to sell your personal information;
- Request that American Bank & Trust disclose to you:
  1. The categories of personal information the Bank has collected about you;
  2. The categories of sources from which the personal information is collected;
  3. The purpose for collecting the personal information;
  4. The categories of third parties with whom the Bank shares personal information, and
  5. The specific pieces of personal information that the Bank has collected about you;
- Request that American Bank & Trust delete your personal information, to the extent possible; and
- Receive non-discriminatory services and product pricing from American Bank & Trust, regardless of whether you exercise your privacy rights under the CCPA.

Please note that identities of individuals requesting deletion or disclosure of their personal information must first be verified to protect you and the Bank from fraud and identity theft. Please note that the Bank may not disclose or delete all personal information requested by consumers due to various state and federal regulations governing financial institutions and available statutory exemptions.

What Personal Information is Covered?

Personal information is defined under the CCPA to include any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with a particular consumer or household. Examples include social security numbers, account information, transaction histories, credit information, and biometric data.

Much of the personal information that the Bank collects is already regulated by federal and state laws, and therefore is exempt from the CCPA. For instance, the CCPA does not apply to personal information collected or disclosed in connection with financial products or services that are used primarily for personal, family, or household purposes. For information regarding how American Bank & Trust uses personal information collected in connection with these financial products or services, please see the Bank's Consumer Privacy Policy. The CCPA also does not apply to information that is governed by the privacy, security and breach notification rules issued by the U.S. Department of Health and Human Services pursuant to Health Insurance Portability and Accountability Act. Currently, the CCPA does not apply to personal information that reflects a communication or transaction between the Bank and another company, partnership, sole proprietorship, non-profit, or government

agency, so long as that communication or transaction involves due diligence about the Bank or other business, or the Bank is providing or receiving a product or service. The CCPA also currently does not afford access or deletion rights to you if your information was collected and used by the Bank in the context of your role as a job applicant, employee, director, officer, medical staff member, or contractor of the Bank.

#### Your Choices

Currently, American Bank & Trust does not sell personal information. If in the future, American Bank & Trust seeks to sell the personal information of California residents, it will provide notice and opportunity to opt-out. By default, California residents the Bank knows to be under the age of 16 would be opted out of the sale of their personal information.

If you would like to request that the Bank delete your personal information, you may do so by calling or visiting any branch and submitting a CCPA request. Please note that not all personal information is eligible to be deleted. For example the Bank may retain personal information in order to:

- Complete transactions or services for which the information was collected or reasonably anticipated, or provide a service requested by the consumer;
- Detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity and prosecute those responsible for such activity;
- Debug or identify errors;
- Exercise free speech, or allow other consumers to do the same;
- Comply with certain sections of the California Electronic Communications Privacy Act;
- Engage in certain types of research where the consumer has provided informed consent;
- Enable solely internal uses reasonably aligned with consumer expectations;
- Comply with a legal obligation; or
- Otherwise use it internally in a lawful manner that is compatible with the context in which the consumer provided the information.

#### **Disclaimer (Third-party web sites)**

American Bank & Trust's website contains links to other websites for additional services and/or purely for informational purposes. A link between this website and another website does not constitute a product or program endorsement by American Bank & Trust or any of its employees. American Bank & Trust does not provide and is not responsible for, the product, service, overall web content, security or privacy policies on any external third-party sites.