

Last Updated April 5, 2024

Your privacy is important to us. We conduct regular assessment reviews and abide by rigorous privacy standards to ensure personal information we collect, use and share is protected. This Online Privacy Notice (“Notice”) describes how 21st Century Bank and our affiliates manage personal information about you when you interact with us online through our websites, mobile applications, and social sites (“Sites and Mobile Apps”) through your computer, smartphone, tablet or other mobile devices (“Computer or Mobile Devices”).

This Notice explains how we collect personal information when you visit, use, or interact with us online.

The term “21st Century Bank” or “we”, “us” or “our” in this Notice refers to banking and non-banking affiliates or subsidiaries of 21st Century Bank that link to or reference this Notice.

By using our Sites and Mobile Apps, you agree to the terms and conditions of this Notice. If you visit or use one of our online services, please review the privacy policy applicable to that service to understand how your information is collected, used, and shared.

21st Century Bank works with third-party providers who are contractually obligated to comply with our policies to protect information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how your online personal information may be collected, used and shared.

Updates to this Notice

This Notice is subject to change. We may update this Notice periodically to comply with the most recent federal and local laws. Please review it whenever you have questions. If we make changes to this Notice, we will revise the ‘Last Updated’ date on this page.

Our Online Privacy Practices

We are committed to the transparency of your personal information. We ask for your consent when required, otherwise by using our Site and Mobile Apps, you consent to the collection, use and sharing of your personal information subject to and consistent with applicable laws, regulations, and other notices you may have received based on your relationship with us.

Linking to other sites

We may provide links to non-affiliated third-party sites, such as service providers or merchants. If you follow links to sites not affiliated with, or controlled by 21st Century Bank, you should review their privacy and security policies and other terms and conditions, as they may be different from those of our Sites and Mobile Apps. 21st Century Bank does not guarantee and is not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information.

Protecting your personal information

To protect personal information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third-party providers to ensure personal information remains confidential and secure. In the event of a data breach, we provide timely notification, in accordance with applicable laws and regulations.

We recognize the importance of protecting privacy where children are involved. Our Sites and Mobile Apps are not marketed to individuals under the age of 13. Accounts that include online access for children under the age of 13 are owned by a parent or guardian and require specific consent for online access. We do not knowingly collect personal information from children under 13 without prior parental consent.

Making sure personal information is accurate

Keeping your personal information accurate and up to date is very important. If your personal information is incomplete, inaccurate, or not current, please use the Contact Us option on our Sites and Mobile Apps or call or write to us at the telephone numbers or appropriate address for changes listed on your account statements, records, online or other account materials. You can also speak to a customer representative at a branch location.

Personal Information we Collect Online

How do we collect personal information online?

We collect personal information about you through your computer or mobile devices using cookies and similar tracking technologies as well as personal information you provide when you visit or use our Sites and Mobile Apps.

We collect your personal information when you open an account, apply for a loan, make deposits or withdrawals from your account, provide employment information, show your identification or driver's license.

The personal information we collect is limited to what is required to provide our products or services and to support legal and risk requirements. For additional information please review the **How do we use your personal information** section of this Notice.

The type of personal information we collect from and about you online will depend on how you interact with us and may include:

- Contact information such as name, mailing address, email address, telephone, and mobile number(s).
- Identifiers such as Social Security number, account number(s), driver's license number (or comparable) or other information that identifies you for ordinary business purposes.
- Account information such as balances, payment history, transaction history.
- Access Authorization such as user ID, alias, PIN and password and security questions and answers.
- Documents or images submitted via our Site or Mobile Apps to support account opening, such as statements or voided checks.
- Debit/Credit Card Information such as card number, expiration date, CVV2, billing address.
- Information from your computer and mobile devices where allowed by individual browsers and/or operating systems such as:
 - Unique device identifiers (for example Media Access Control (MAC) and internet Protocol (IP) addresses)
 - Browser type, version, language, and display/screen settings
 - Information about how you use and interact with our Sites and Mobile Apps (for example, activities on pages visited, links clicked or unique and measurable patterns such as keystrokes, mouse clicks and movements, swipes and gestures)
 - Communications data, such as your communication preferences and details or the content of your communications with us (e.g., text messages, chat messages)
 - Geolocation information (for example, for real time ATM or financial center location, upon request, or for fraud prevention)
 - Social media preference

How do we use your personal information?

Personal information collected from and about you online described in this Notice may be used for many purposes such as:

- Personalizing your digital and mobile experience by enhancing our Sites and Mobile Apps organization and design and analyze data to create relevant alerts, products, or services.
- Detecting and preventing fraud, identity theft, and other risks to you or 21st Century Bank.
- Performing analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view.
- Complying with and enforcing applicable legal requirements, industry standards, contractual obligations, and our policies.

- Allowing you to use features within our Sites and Mobile Apps when you grant us access to personal information from your device, such as geo-location when you request certain services that require such access, for example locating an ATM.

We retain personal information for a period as required by laws and regulations and the necessary business purpose. When you are no longer our customer, we continue to share your information as described in this Notice. We securely delete personal information as soon as legally permitted.

With whom do we share your personal information?

We do not share your personal information with anyone, including our affiliates.

Third Party Data Sharing

Some companies may offer aggregation websites and services that allow you to share your data with them in order to consolidate your account information from different sources (such as your accounts with us or with other financial institutions) so that you can view it in one location or perform actions related to your accounts using their services. To do this, a third-party may request you to authorize access to your 21st Century Bank accounts by providing your 21st Century Bank user ID and password.

- The third-party may access, on your behalf, information about you, your 21st Century Bank relationship and your accounts at 21st Century Bank.
- You should use caution and ensure that the third-party has appropriate policies and practices to protect the privacy and security of any personal information you provide or to which they are gaining access.
- The use of our information by a third-party is governed by your agreement with them, not by 21st Century Bank. We recommend reviewing the third-party's policies before sharing your personal information to understand how they will use and store your account information.
- We are not responsible for the use or disclosure of any personal information accessed by a company or person to whom you provide your site user ID and password.
- If you share your 21st Century Bank user ID, password, or other information about your accounts with others, we will consider that you have authorized any transaction or action initiated by using the access information you provide.
- If you decide to revoke the authority you have given to a third-party, we strongly recommend that you change your 21st Century Bank password to ensure that the third-party cannot continue to access your account.

Social Media

21st Century Bank engages with customers on social media platforms such as Facebook, X (formerly Twitter), YouTube, and LinkedIn.

- Any content you post on official 21st Century Bank managed social media pages such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms.
- When interacting with official 21st Century Bank social media pages, 21st Century Bank's privacy notices, social media user terms and community guidelines may apply.
- Please review the privacy policy for the specific social media service you are using to better understand your rights and obligations regarding such content.

We may allow social share buttons on our sites that enable users to easily share information on social media platforms. The non-affiliated third parties that own these widgets may have access to information about your browsing on pages of our Sites and Mobile Apps where these widgets are placed.

FACTS**WHAT DOES 21ST CENTURY BANK DO WITH YOUR PERSONAL INFORMATION?**

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 ● Income ● Account balances ● Payment history ● Transaction history ● Transaction or loss history When you are <i>no longer</i> 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 21st Century Bank chooses to share; and whether you can limit this sharing.																						
<table><tr><th>Reasons we can share your personal information</th><th>Does 21st Century Bank share?</th><th>Can you limit this sharing?</th></tr><tr><td>For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td><td>Yes</td><td>No</td></tr><tr><td>For our marketing purposes - to offer our products and services to you</td><td>Yes</td><td>No</td></tr><tr><td>For joint marketing with other financial companies</td><td>No</td><td>We don't share</td></tr><tr><td>For our affiliates' everyday business purposes - information about your transactions and experiences</td><td>No</td><td>We don't share</td></tr><tr><td>For our affiliates' everyday business purposes - information about your creditworthiness</td><td>No</td><td>We don't share</td></tr><tr><td>For nonaffiliates to market to you</td><td>No</td><td>We don't share</td></tr></table>			Reasons we can share your personal information	Does 21st Century Bank share?	Can you limit this sharing?	For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No	For our marketing purposes - to offer our products and services to you	Yes	No	For joint marketing with other financial companies	No	We don't share	For our affiliates' everyday business purposes - information about your transactions and experiences	No	We don't share	For our affiliates' everyday business purposes - information about your creditworthiness	No	We don't share	For nonaffiliates to market to you	No	We don't share
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For our marketing purposes - to offer our products and services to you	Yes	No																					
For joint marketing with other financial companies	No	We don't share																					
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Questions?	Call 763-767-21ST or go to www.21stcb.com																						

What We Do	
How does 21st Century Bank protect my personal 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 21st Century Bank collect my personal information?	We collect your personal information, for example, when you ● Open an account ● Apply for a loan ● Make deposits or withdrawals from your account ● Provide employment information ● Show your driver's license 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 nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. ● <i>Our affiliates include:</i> ● <i>Others, such as: Crosstown Holding Company</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. ● <i>21st Century Bank does not share with nonaffiliates so they can market to you.</i>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ● <i>21st Century Bank doesn't jointly market.</i>