



Bank of the Rockies

Online Privacy Notice

Last updated October 2023

Bank of the Rockies (BOR) conducts regular assessment reviews and abides by thorough privacy standards to ensure the personal information we collect, use, and share is protected. This Online Privacy Policy (Policy) describes how BOR, and our affiliates manage personal information about you when you interact with us online through our websites, event registration sites, mobile applications, and social sites through your computer, smartphone, tablet, or other mobile devices.

This notice explains:

- How we collect personal information when you visit, use, or interact with us online, and through our ads displayed through online services operated by us or non-affiliated third parties
- How we may use or share personal information collected to deliver products and services to you and for advertising or event management purposes

The term Bank of the Rockies, BOR or we, us, or our in this Policy refers to banking and non-banking U.S. affiliates or subsidiaries of Bank of the Rockies that link to or reference this Notice.

By using our Sites and Mobile Apps, you agree to the terms and conditions of this Policy. BOR 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 Policy

This Policy is subject to change. We 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 Policy, 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 Website and Mobile Apps, you consent to the collection, use, and sharing of your personal information subject to and consistent with applicable laws 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 credit bureaus, service providers, or merchants. If you follow links to sites not affiliated with or controlled by BOR, 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. BOR 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.

We also recognize the importance of protecting privacy where children are involved. Our Website (Site) and Mobile Apps are not marketed to individuals under the age of 13, and we request that these individuals do not provide personal information through our Sites and Mobile Apps. We do not knowingly collect personal information from children under 13.

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 in other account materials. You can also speak to an Operation Specialist in our Helena Operations Center or a Relationship Banker at your local branch.

Personal Information We Collect Online

How We Collect Personal Information Online

We collect personal information about you through your computer or mobile devices using cookies and similar tracking technologies (see our Cookie Policy for details) as well as personal information you provide when you visit or use our Sites and Mobile Apps, for example when you:

- Apply for or open a new account.
- Register for a new product or service, or request information about a product or service Register as a participant in one of our events.
- Complete a survey, contest or sweepstakes entry, or other promotion.

We may use third party providers to process personal information for business purposes on our behalf. Third party providers are contractually obligated to comply with our policies to protect information we share with them, or they collect on our behalf.

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 We Use Your Personal Information section of this Policy.

Types of Personal Information We Collect Online

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)
- Account Application information such as credit and income information
- 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.
- Access Authorization such as username, PIN and password, and security questions and answers
- Information from your computer and mobile devices were 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) Responses to advertisements on sites and mobile apps where we advertise.
 - Log information, such as your search and voice to text queries in the mobile app Search engine referrals

- Geolocation information with consent (for example, ATM or financial center location, fraud prevention) Social media preference
- Information to facilitate virtual or in-person event management (for example, attendee names, dietary requirements, special assistance needs, and travel details for participants)

How We Use and Share Personal Information How We Use Your Personal Information

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

- Delivering products and services to you by verifying your identity (for example, when you access your account information); processing applications for products or services, such as to prequalify for a mortgage, apply for a credit card, or to open a retirement account, investment account, or other financial product; processing transactions; finding nearby ATMs, financial centers, and other specialized location-based services near your location.
- 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.
- Providing advertising on our Sites and Mobile Apps as well as non-affiliated third-party sites and through off-line channels like financial centers, call centers, and direct marketing (for example, email, mail, and phone)
- Detecting and preventing fraud, identify theft, and other risks to you or the Bank of the Rockies
- 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 contact lists, or geo-location when you request certain services that require such access, for example, locating an ATM. This may also include biometrics and a camera. Users will be prompted to allow access to this data, and if access is not allowed, the feature requiring that data will not be fully functional.
- Providing notifications concerning events for which you've registered, providing analysis to improve our events and develop new events, determining event overall effectiveness, enhancing products and services, operating, and expanding our business activities.

We retain personal information for a period of time as required by laws and regulations and for the necessary business purpose. We securely delete personal information as soon as legally permitted.

Individual Health and/or Sensitive Information

To the extent that we receive, maintain, or process an individual's health information, BOR may use and disclose that information as authorized by and in accordance with applicable federal and/or state law.

At the time of event registration, participants may provide information that requires special accommodations. This information will be used only to the extent necessary to facilitate any special accommodation for event participation.

Sharing Your Personal Information

We may share the personal information we collect from and about you online described in this Policy (and subject to other legal restrictions and notices you may have received depending on your relationship with us) with:

- Affiliates and Subsidiaries of Bank of the Rockies
- Third Party Providers who have contracts with BOR including event vendors, organizers, volunteers, contractors, and sponsors.
- Government Agencies as required by laws and regulations Aggregated/De-identified Information.

Collected personal information may be aggregated and/or de-identified (we remove any details that identify you personally). We may share this aggregated and/or de-identified information with third party providers to help deliver products, services, and content that are better tailored to the users of our online services and for our own business purposes where permissible under applicable laws and regulations.

Limiting Sharing

You have choices regarding the sharing of some personal information. Where appropriate, we will limit the sharing of your personal information based on your privacy choices.

Online Behavioral Advertising

Personal information collected from and about you online as described in this Policy is used and shared to deliver advertising and marketing which may be of interest to you.

We present tailored ads to you:

- On our Sites and Mobile Apps through ads that appear as you sign on or off your online accounts
- In off-line channels such as financial centers, call centers, and through direct marketing (for example email, mail, phone)
- On third party sites and mobile apps not affiliated with Bank of the Rockies

How We Tailor Ads to You

- Advertising on our Sites, Mobile Apps, and off-line channels, such as financial centers, call centers, and through direct marketing (for example email, mail, phone): We may use personal information about your activities on our Sites and Mobile Apps, such as pages visited and key words entered, to help determine which of our ads or offers may be of interest to you. We may use personal information about your relationship with us (such as types of accounts, transactional information, or the location in which you bank) to help determine which advertisements or offers to present to you.
- Advertising on non-affiliated third-party sites and mobile apps: BOR contracts with advertising companies to advertise our products and services on sites and mobile apps not affiliated with us. We may use personal information we have collected or that you have provided to assist our non-affiliated third-party sites and mobile apps to select bank ads or offers that may appeal to you, display them to you, and monitor your responses. Non-affiliated third-party sites and mobile apps are not subject to BOR Privacy Policies and Notices.

Limiting Targeted Advertising

You have choices about how BOR advertises to you.

- Advertising on off-line channels such as financial centers, call centers, and through direct marketing (for example email, mail, phone): If you prefer we not provide you with tailored content and advertising based on your online behavior with our Sites and Mobile Apps, you may unsubscribe from our emails and/or call 406-295-1900 and request to be added to our 'Do Not Call' list.

Industry standards are currently evolving, and we may not separately respond to or take any action with respect to a "do not track" configuration set in your internet browser.

Reminder

Please note that if you opt out of this advertising:

- You may still receive general advertising from Bank of the Rockies
- When accessing Bank of the Rockies's online account servicing areas – after login – you may receive tailored content and advertising based on your account relationships.
- Financial advisors/Bankers may continue to use personal information collected online as described in this Policy to provide details on products and services in accordance with account agreements.
- In order for online behavioral advertising to opt outs from our Sites and Mobile Apps and on other sites to work on your device, your browser must be set to accept cookies.
- If you delete cookies, buy a new device, access our Sites and Mobile Apps or other sites from a different device, login under a different screen name, or change web browsers, you will need to opt out again.

Additional Information

Third Party Data Sharing

Some companies may offer aggregation websites and services that allow you to share your data with them 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 BOR accounts by providing your BOR username and password or by providing your information-sharing consent directly to the Bank of the Rockies.

- The third party may access, on your behalf, information about yourself, your BOR relationship, and your accounts at BOR.
- 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.
- Use of your information by the third party is governed by your agreement with them, not by Bank of the Rockies.
- We are not responsible for the use or disclosure of any personal information accessed by any company or person to whom you provide your site username and password.
- If you share your BOR username, 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 BOR password to ensure the third party cannot continue to access your account.

Social Media

BOR may engage with clients on social media platforms such as Facebook®, YouTube® and LinkedIn®.

- Any content you post on official Bank of the Rockies-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 BOR social media pages, Bank of the Rockies privacy notices, and other policies related to such social media pages 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.

Bank of the Rockies Advertising Opt Out Disclosure

Ways you can Limit Targeted Advertising

You have choices about how BOR advertises to you.

- Direct Advertising via off-line channels such as financial centers, call centers, and through direct marketing (for example email, mail, phone): If you prefer we not directly provide you with tailored content and advertising based on your online behavior with our Sites and Mobile Apps, you can unsubscribe to our promotional emails and/or call 406-495-1900 and request to be added to our 'Do Not Call' list.
- Advertising on Non-Affiliated Third-Party sites: Ads served on our behalf by third party companies do not contain unencrypted personal information and we limit the use of personal information by companies that serve our ads.

Bank of the Rockies Cookie Policy

This policy explains how Bank of the Rockies uses cookies and similar tracking technologies when you interact with BOR online through our websites and mobile applications ("Sites and Mobile Apps").

Introduction

The use of cookies and similar tracking technologies (including pixels or clear GIFs, tags, and web beacons/objects) is a common internet practice. Cookies are text files containing small amounts of information that are downloaded to your computer, smartphone, tablet, or other mobile device when you visit a website. Tracking technologies may collect information about you and your use of sites and mobile apps. We have developed this policy to provide general information on cookies and similar tracking technologies which we will refer to as "cookies." Cookies are useful in a number of ways, including allowing a site or mobile app you use to recognize your device, keep track of

pages visited, and even remember your preferences. This information is used for security purposes, to facilitate navigation, to display information more effectively, and to personalize the user's experience. Cookies and similar tracking technologies are also used to gather statistical information about how sites and mobile apps are used in order to continually improve design and functionality and assist with resolving questions regarding the sites and mobile apps. We will retain personal information collected through cookies for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods includes the purpose for which the Personal Data was collected, whether there is a legal obligation to which we are subject, and whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Attributes of Cookies

Cookies set by BOR, and cookies created and set by third party providers on our behalf are called first party cookies. Cookies set by third party providers which are permitted by BOR, but which are not set on our behalf are called third-party cookies.

Information obtained from a third-party cookie can only be used for the purposes for which we have stated in the contract. There can be first-party and/or third-party cookies within any of the below Categories of Cookies. Cookies have a duration period. Cookies that expire at the end of a browser session are called "session" cookies. Cookies that are stored longer are called "persistent" cookies. There can be session and/or persistent cookies within any of the below Categories of Cookies except for Geolocation Cookies, which are only session cookies.

Categories of Cookies

Below is a list of the types of cookies used in our Sites and Mobile Apps. We classify cookies into the following categories:

- **Strictly Necessary Cookies**

These cookies are necessary for our Sites and Mobile Apps to function and cannot be switched off in our systems. Without these cookies, our Sites and Mobile Apps will not work properly. Examples include setting your privacy preferences, setting your language preferences, or logging in a secured area requiring authentication. Strictly necessary cookies may also detect transmission errors or data loss or distribute network traffic across different servers to ensure accessibility.

- **Performance Cookies**

Performance cookies enable us to measure and improve the performance of our Sites and Mobile Apps. These cookies collect information about how visitors use our Sites and Mobile Apps, for instance, which pages visitors go to most often and if they get error messages. These cookies can also be used to make collective inferences based on choices and browsing behavior for market research.

- **Preference Cookies**

Preference cookies enable our Sites and Mobile Apps to provide enhanced functionality and personalization by allowing our Site or Mobile App to remember choices you make. These cookies can be used to remember changes you have made to text size, fonts, and other parts of web pages that you may have customized as well as pre-filling forms. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog.

- **Advertising Cookies**

Advertising cookies are used to deliver advertisements that may be relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They are usually placed through our Sites and Mobile Apps by our advertising partners and remember that you have visited our Site or Mobile App. This information may be shared with other organizations such as advertisers.

- Geolocation Cookies

Geolocation cookies allow us to determine your location in order to provide you with information you request, such as the location of the nearest office. Consent for these cookies is requested at the time of the request, and the information is not retained after the session ends.

Third Party Providers

BOR works with third party providers who are contractually obligated to comply with our policies to protect information. We may contract with a third-party provider to provide support to us through their sites. If you are on one of our Sites or Mobile Apps and you click a link to one of their sites, you will be presented with a notice that you are continuing to a site that we do not own. The third- party provider is solely responsible for cookies, cookie tracking, and your choices for managing cookies on their site. Please refer to the posted privacy policy and terms of use. When we contract with a third-party provider to manage the content of the information within our Sites and Mobile Apps, the third-party provider is solely responsible for cookies, cookie tracking and your choices for managing cookies.