

## Digital Privacy Policy

### The Community Bank Consumer Banking

LAST UPDATED MARCH 2024

**Your privacy is important to us. This Digital Privacy Policy explains how The Community Bank (the "Bank") and the other subsidiaries of The Community Bank (the Bank and other subsidiaries collectively, "Subsidiaries" or "us" ) collect, share, use, and protect information when you visit or use any digital service offered by any of the Subsidiaries that link to or reference this policy (collectively "digital services"). This policy covers the Subsidiaries' many digital services, including their websites, mobile applications, and social media sites or pages, as well as any interactions you may have while viewing content provided through one of the Subsidiaries' digital advertising campaigns displayed through online services operated by us or nonaffiliated third parties. You do not have to be a Bank customer for this Digital Privacy Policy ("Policy") to apply to you, and you will see this Policy at the bottom of the web page you are on, or in the drop-down menu of the app you are using.**

**If you have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with our consumer Privacy Policy, which offers you certain choices with respect to the use and sharing of your personal information.**

**As you review this Digital Privacy Policy, please keep in mind that our online services are not intended for children under 13. We do not knowingly collect personal information from children under 13 without parental consent , and we request that no Personal Information be provided by children under 13 through our online services.**

#### Security

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings. Your participation in protecting your Personal Information is also important. Visit [www.thecombank.com](http://www.thecombank.com) for additional information about how we protect your Personal Information and about your role in protecting your personal information.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

#### Updating your information

Keeping your account information up-to-date is very important. You may review, or update certain account information by logging in and accessing Digital Access. If you cannot change the incorrect information online, or you prefer to request changes offline, please use the Contact information on our site, or call or write to us using the contact information listed on your account statements, records, or other account materials. You can also speak to one of our branch representatives, your financial advisor, or your designated account representative.

## Information we collect

When you visit or use our online services, we may collect personal information from or about you of the types listed in this section.

### Personal Information

We will collect your name, email address, mailing address, telephone number(s), account numbers, limited location information (for example, geo-location to help you find a nearby ATM), access credentials, such as user name, password, and security answers. We may also collect payment card information, social security numbers, driver's license numbers (or comparable) when you provide such information while using our online services and where we believe it is reasonably required for our everyday business purposes.

### Usage and other information

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, your geographic location, the type of operating system and browser you use, information about the site you came from, the parts of our online service you access, responses to advertisements on sites and mobile apps where we advertise, and social media preference.

### Cookies

We or our third-party partners may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you. See below for more detail on our use of cookies and other technologies.

### Mobile access

For your convenience, the Bank offers you the ability to access some of the Subsidiaries' products and services through mobile applications and mobile-optimized websites ("Mobile Access"). When you interact through Mobile Access, we may collect information such as unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device. We may ask your permission before collecting certain information (such as precise geo-location information) through Mobile Access.

### Additional sources of information

We may also collect information about you from additional online and offline sources including from co-branded vendor sites or commercially available third-party sources, such as credit reporting agencies. We may combine this information with the personal and other information we have collected about you as described in this Digital Privacy Policy.

### Use of information

We use the information discussed above in a number of ways, such as:

- Processing applications and transactions;
- Verifying your identity (such as when you access your account information);

- Preventing fraud and enhancing the security of your account or our online services;
- Responding to your requests and communicating with you;
- Managing your preferences as requested by you;
- Performing analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view;
- Providing you tailored content and advertisements on our websites 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);
- Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions);
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies; and
- For any other purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations. 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.

## Disclosure of information

We may share the information we collect from and about you with our affiliates and other third parties. For example, we may share your information with:

- Third-party service providers;
- The Subsidiaries' websites and businesses in an effort to bring you improved service across our products and services, when permissible under relevant laws and regulations;
- Other companies to bring you co-branded services, products or programs;
- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger involving one or more of the Subsidiaries' businesses; and
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

We limit sharing of your information in accordance with the choices you have provided us in response to our consumer Privacy Policy. We may share anonymously or aggregate information with third parties to help deliver products, services, and content that are better tailored for use through our services and for other purposes.

## Understanding cookies, web beacons, and other tracking technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. These tracking tools may detect characteristics or settings of the specific device you use to access our online services, and some of them are listed here.

- “Cookies” are small amounts of data a website can send to a visitor’s web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience.
- Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.
- Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way.

Most web browsers allow you to adjust your browser settings to decline or delete cookies and other tracking technologies. We do not and are not able to override such settings, but be aware that some adjustments to your settings may degrade your experience with our online services.

We also do not and are not able to override browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice about collection of their personally identifiable information about individual consumers’ online activities over time and across third-party webpages.

## Online advertising

You will see advertisements when you use many of our online services. These advertisements may be for our own products or services or for products and services offered by third parties. Which advertisements you see is often determined using the information we or our affiliates, service providers and other companies that we work with have about you.

We may present tailored ads to you:

- On our websites and mobile apps through ads that appear as you sign on or off of 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 the Bank.

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 websites 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. Where permitted by applicable law, we may share with others the information we collect from and about you.

Advertising on non-affiliated third-party sites and mobile apps: the Bank 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 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 the bank's policy.

Online behavioral advertising (also known as "OBA" or "interest-based advertising") refers to the practice of collecting information from a computer or device regarding a visitor's web-browsing activities across non-affiliated websites over time in order to deliver advertisements that may be of interest to that visitor based on their browsing history. Through OBA, we hope to deliver advertisements that are most likely to be of interest to you using information about your other web-browsing activities (e.g., the web pages you visit, search terms you enter, and the way you move through our online services on your computer or device) or your personal profile (e.g., demographic or location information).

Certain companies we work with may set cookies and use related tracking technologies, such as the clear GIFs discussed above, throughout our online services or in our communications to support these OBA efforts. If you do not want your information collected and used by the companies we work with for OBA purposes, you can opt out of this form of OBA by following the instructions in the next section.

### Opting out of "Online Behavioral Advertising" (OBA)

You can opt out of OBA from certain ads on third party websites through the cross-industry Self-Regulatory Program for Online Behavioral Advertising managed by the Digital Advertising Alliance (DAA). [DigitalAdvertisingAlliance.org](https://www.digitaladvertisingalliance.org).

Bear in mind that because cookies are stored by your browser, if you use different browsers on your computer, or multiple computers and devices that have browsers and you do not wish to have cookies collect information for OBA purposes, you will need to opt out of OBA from each browser on each of the computers and devices that you use. Please note that even if you opt out of OBA, you may still receive advertisements from us; they just won't be customized based on your web-browsing activities on third-party websites.

The Subsidiaries may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

### Additional information

#### 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 account(s) with one or more of the Subsidiaries by providing your Digital Access username and password or by providing your information-sharing consent directly to us.

- The third party may access, on your behalf, information about yourself, your relationship with one or more of the Subsidiaries, and your accounts with us.
- 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 the Subsidiaries.
- We are not responsible for the use or disclosure of any personal information accessed by any company or person to whom you provide your username and password.
- If you share your Digital Access username and 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 Digital Access password to ensure that the third party cannot continue to access your account.

## Social Media

We engage with customers on social media platforms such as Facebook®, Twitter®, YouTube® and LinkedIn®.

- Any content you post on official social media pages managed by one or more of the Subsidiaries - 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.
- Please review the privacy policy for the specific social media service you are using to better understand your rights and obligations with regard to 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.

## Changes to this digital privacy policy

We may change this Digital Privacy Policy from time to time. When we do, we will let you know by posting the revised policy on this page with a new "Last Updated" date. Any changes to this Digital Privacy Policy will become effective when posted unless indicated otherwise.