

Community Bank Online Privacy Policy

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Introduction

Community Bank, N.A. (“Community Bank”, “we”, “us”, or “our”) respects your privacy and is committed to protecting it as described in this policy.

This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use this website (<https://cbna.com/>) (“Website”) or other online services, including our mobile applications, as well as any interactions you may have while viewing content provided through one of our digital advertising campaigns (collectively, “Online Services”).

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 [Privacy Policy](#), which offers you certain choices with respect to the use and sharing of your Personal Information (as defined below).

This Online Privacy Policy does not apply to information collected by any third party including through any application or content (including advertising) that may link to or be accessible from or on the Website or other Online Services.

Please read this Online Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our Online Services. By accessing or using this Website, you agree to this Online Privacy Policy. This Online Privacy Policy may change from time to time (*see Changes to Our Online Privacy Policy*). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check this Online Privacy Policy periodically for updates.

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13 without parental consent. If you are under 13, do not use or provide any information on the Website. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us by clicking on the “Contact” button at the top of our website (www.cbna.com) and following the instructions under “General questions.”

Information We Collect About You and How We Collect It

We collect different types of information from and about users of our Online Services. Through the use of our Online Services, the information we collect may include, but not be limited to:

- **Personally Identifiable Information:** We may collect data about you by which you may be personally identifiable such as name, telephone number, email address, mailing address, account numbers, username and password, or other similar information that can be used to identify you. We may also collect payment card information, social security numbers, driver’s license numbers, income, account balances, payment history, credit history, and credit scores when you provide such information while using our Online Services and where we believe it is reasonably required for ordinary business purposes (“Personal Information”).
- **Usage Data:** Data may be collected from you automatically when you access our Online Services about how you access and use our Online Services (“Usage Data”). Usage Data may include

information such as your device's Internet Protocol address, internet domain, browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you use our mobile application, we may collect additional information such as unique device identifiers for your mobile device, device settings, information about your location, and analytical information about how you use your mobile device.

- Location Information: We may also collect geolocation information, which allows us to provide geofencing features and other technical services that depend on location-based data. This information may be derived from your device's settings, IP address, or other technical signals, depending on how you interact with our services and your device permissions. Further, we may provide location services via a zip code to help you find a nearby ATM or location information if permission is granted via the Website or mobile device. Location information may be considered Personal Information under applicable law.
- Aggregate Data: We may collect data that is about you but does not individually identify you, such as statistical information and analytic data relating to Website usage.

We collect information:

- Directly from you when you provide it to us such as through the use of the Contact Us form.
- When you correspond with us, such as records or copies of correspondence (including email addresses) if you contact us.
- Automatically as you navigate through the Online Services.
- When you provide information to us in a customer application, deposit account information, loan application, credit card application, or other applications for services we provide.
- From other sources and combine that with information we collect directly from you. For example, we may obtain information about you from our business partners or service providers that we engage to perform services on our behalf.
- From publicly available sources.

Technologies Used for Automatic Data Collection

We use cookies, pixels, analytics tools and other technologies to make our Website work properly, improve its performance, understand how visitors interact with it, and deliver relevant content and advertising. These technologies help us provide a better user experience and measure the effectiveness of our marketing efforts.

We may automatically collect, use, store, and transfer certain information about your visit to our Website through technologies such as cookies, pixels, and analytics tools. Some of these technologies are provided by third-party service providers, and information collected through them may be shared with or directly collected by those third parties.

Below is an overview of some of the technologies we utilize:

- **Cookies** are small files placed on your device that allow us to recognize your browser and store preferences or settings. We use cookies to enhance Website usability, to provide website functionality, personalize content, and improve your experience. In addition to our own cookies, third-party providers may place cookies on your device to support analytics, advertising, and other services.
- **Pixels** are small pieces of code embedded on a webpage that help track user interactions, such as page views or clicks. Pixels are often used to measure the effectiveness of advertising and understand user actions on the Website. Some pixels may be provided by third parties and may allow third-party providers to collect information about your activity for analytics and marketing purposes.

- **Analytics** may be provided by third-party vendors to analyze Website traffic and usage. These vendors use cookies and similar technologies to collect information such as your IP address, browser type, and browsing behavior. This information is transmitted to and stored by these vendors on their servers (or those of their subprocessors). They use it to provide us with reports and insights and may share it with other parties where required by law or for their own processing purposes. For example, we utilize Google Analytics, a web analytics website offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google websites. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having your activity on the Website made available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visit activity. For more information about the privacy practices of Google, please visit the Google Privacy Terms web page at <https://policies.google.com/privacy?hl=en>. We may also use other providers, including but not limited to Hotjar, and pixels provided by Meta and LinkedIn.
- **Third-Party Tracking Technologies** may be utilized by third party service providers to collect information about your online activities across different websites and services. We do not control these technologies or how third parties use the information they collect. For details on how these third parties handle your data, please refer to their respective privacy policies.

Third Party Service Providers

Some of our Online Services are developed, hosted, and managed by third party service providers. Some of the information collected through our Online Services is not collected directly by Community Bank but is collected by our service providers. By using our Online Services, you understand that your Personal Information collected through downloading, registering with, and using our Online Services may be shared with and/or collected by our service providers.

Similarly, some of our Online Services may be offered through white-labeled or co-branded experiences operated by third-party providers. Although these pages may display our brand, they may be hosted and managed by another company. Personal information collected in those experiences may be processed by the provider in accordance with its privacy notice and its agreement with us. For more information, please contact us by clicking on the “Contact” button at the top of our website (www.cbna.com) and following the instructions under “General questions.”

Links

The Website may contain links to other websites or access to applications, including social media websites and applications, that are operated by third parties. Please be aware that Community Bank is not responsible for the privacy practices of any third party, including any third party with whom it has an affiliation or business relationship. We do not control, and we shall have no liability or responsibility whatsoever for any third-party websites, and this Online Privacy Policy does not apply to those websites. Please consult the terms and conditions and privacy policies of those third-party websites to find out how they collect and use your information and to determine whether and how they use cookies.

We may receive some information that you submit to a third-party website or application that you access through the Website.

How We Use Your Information

We use your information, including any Personal Information:

- To process applications and transactions, and maintain your account(s);
- To verify your identity;
- For account and credit related purposes;
- To offer our products and services to you, including for joint marketing with other financial companies, and for our affiliates to market to you;
- To respond to requests and communicate with you;
- To present our Website and its contents to you;
- To provide you with information that you request from us;
- To fulfill any other purpose for which you provide Personal Information;
- To notify you about changes to our Online Services;
- To allow you to participate in interactive features on our Website;
- To prevent and detect criminal and/or fraudulent activity that may be damaging to you and us;
- To respond to court orders and legal investigations, and to comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies; and
- For any other purpose with your consent or as provided by applicable law and/or regulation.

Disclosure of Your Information

We may disclose aggregated information about our users and information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect, or you provide, as described in this Online Privacy Policy:

- For marketing purposes to offer our products and services to you;
- To our subsidiaries and affiliates, including for marketing purposes;
- To other financial companies to bring you co-branded services, products or programs and for other marketing purposes;
- To contractors, service providers, affiliates and other third parties we use to support our business;
- To credit bureaus;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Community Bank's assets in which Personal Information held by Community Bank about our customers is among the assets transferred;
- To fulfill the purpose for which you provide Personal Information;
- For any other purpose disclosed by us when you provide the information; and
- For any other purpose with your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, regulation, or legal process, including to respond to any government or regulatory request;
- To enforce our agreements, contracts or other legal documentation; and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Community Bank, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Where appropriate, we will limit sharing of your information in accordance with the choices you have provided in response to our [Privacy Policy](#).

If you would like more information about our affiliates and joint marketing partners, please visit our [Privacy Policy](#).

Text Messaging

We may send you text messages to the mobile number you provide to us for non-marketing purposes, including to verify your identity, to deliver authentication codes or other passcodes, and to provide alerts related to fraud or other suspicious activity. You are responsible for providing and maintaining an accurate mobile phone number with us. You may opt-out at any time by responding “STOP” or by contacting us. If you choose not to receive certain text messages, you may not be able to use some authentication, security, or account alert features.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the information you provide to us. We have created mechanisms to provide you with the following control over your information:

Tracking Technologies and Advertising

You can select your preferences via our cookie manager, or you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

Promotional Offers

If you do not wish to have your Personal Information used by Community Bank for email marketing purposes, you can opt-out of these uses of your Personal Information via the unsubscribe link the in the bottom of the email. This opt-out does not apply to information provided to Community Bank for our everyday business purposes, such as to process your transactions, maintain your accounts, respond to court orders and legal investigations, or report to credit bureaus as described in our [Privacy Policy](#). To opt-out of joint marketing with other financial companies, or by our affiliates to market to you, please see our [Privacy Policy](#).

Data Security

The security of your Personal Information is very important to us. Community Bank uses commercially reasonable safeguards that are designed to protect and limit unauthorized access, acquisition, disclosure, destruction, alteration, misuse of, or damage to, your Personal Information. However, please remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Changes to Our Online Privacy Policy

We may update our Online Privacy Policy from time to time. We will notify you of any changes by posting the new Online Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Website, prior to the change becoming effective and we will update the “Last Modified” date at the top of this Online Privacy Policy.

You are advised to review this Online Privacy Policy periodically for any changes. Changes to this Online Privacy Policy are effective when they are posted on this page.

Contact Us

To ask questions or comment about this Online Privacy Policy and our privacy practices, contact us by clicking on the “Contact” button at the top of our website (www.cbna.com) and following the instructions under “General questions.”