

Updated 6/30/22

PA Bankers respects the privacy of its volunteers, members, staff and others who utilize the Association's services including visitors to the PA Bankers website and users of the PA Bankers mobile app. PA Bankers expects its volunteers, members, staff and others with access to confidential or proprietary information to respect legal limits on its usage and to observe appropriate boundaries when communicating online in their Association capacities.

General information usage collection and usage policy. PA Bankers collects data from member organizations, volunteers and other users of Association products or services including PA Bankers' website and mobile app in order to meet the Association's mission, serve member and volunteers' needs, or to notify them of information that we believe will be useful to them. This data may on occasion be shared with other organizations that provide products or services to the financial services industry.

1. **Disclosures to Third Parties.** PA Bankers may make member and volunteer contact information available through the PA Bankers Membership & Committee Directories to other members using its website and to those who register for its events. In addition, PA Bankers may incorporate information users provide into hard copies of the Membership & Committee Directory that it may provide to members and may sell to requesters. On occasion, PA Bankers may also provide limited data to third party vendors that offer products and services for their business purposes to the extent permitted by applicable law and after receiving appropriate assurances from them that the intended usage will be in accordance with applicable law. These limited data include names, job titles, companies and business addresses, but do not include business phone numbers, business fax numbers or e-mail addresses.

Specifically relating to the PA Bankers App, PA Bankers may share your data with third-party vendors, service providers, contractors or agencies ("third parties") who perform services for us or on our behalf and require access to such information to do that work. They also commit to protect the data they hold on to on our behalf and to retain it for the period we instruct. The third parties we may share personal information with are as follows:

- Web and Mobile Analytics - Google Analytics for Firebase
2. **PA Bankers' Website and Mobile App.** PA Bankers does not collect any personal information from users browsing its website or accessing the website through the mobile app. Users to the public areas of our website browse anonymously. Only aggregate data -- such as the number of hits per page -- are collected. Aggregate data are only used for internal and marketing purposes and do not provide any personally identifying information.

- a. **Members, Conference Registrants, and Other Customers.** To gain access to members-only resources and personalization features on the PA Bankers website, members and other users are asked to register and provide some limited information. These data are submitted voluntarily. PA Bankers asks users to provide their name, member number (for members), organization name, business phone, and e-mail. Similar information may be submitted to PA Bankers through membership applications, event registration, publication orders, and subscriptions. Additionally, for some emails sent in HTML format by PA Bankers to its members through its list servers and electronic newsletters, PA Bankers will collect specific information regarding what the recipient does with that email. For those emails, PA Bankers will monitor whether a recipient subsequently clicks through to links provided in the message. Other information collected through this tracking feature includes: email address of a user, the date and time of the user's "click," a message number, name of the list from which the message was sent, tracking URL number and destination page. PA Bankers only uses this information to enhance its products and distribution of those products to its members. This information is not sold or distributed in any other manner.

- b. **Data Collected Via PA Bankers' Website and Mobile App.** PA Bankers uses information voluntarily submitted by members and other customers in the following ways:
 - i. **PA Bankers Member Relations and Products.** Generally, PA Bankers and its direct subsidiary use data collected to improve their respective web contents and app functionality; to respond to visitors' interests, needs and preferences; and to develop new products and services.
 - ii. **Consent to Use Personal Information.** If you reside in the European Economic Area, information about you is protected under Directive 95/46/EC of the European Parliament and of the Council, and statutes adopted by Member States pursuant thereto (the "Directive"). PA Bankers or its agents must store, host and otherwise process the information (including personal data) supplied by the User when registering for this Website. PA Bankers may send such data outside the European Economic Area for processing. If you reside in the European Union, please indicate your consent that the personal information you have provided may be transferred and stored in countries outside of the European Economic Area, including the United States. User supplies information as defined above when registering for the website in order to allow PA Bankers (or its designated agents) to use the information to send the User unsolicited direct mail advertisements, promotions, and solicitations for third parties' products and services to the extent permitted by applicable law. If you reside in Canada, please provide your express consent to receive email communication from PA Bankers.
 - iii. **Credit Card Account Information.** When members and customers choose to pay using their credit cards, PA Bankers submits the information needed to

obtain payment to the appropriate clearinghouse. PA Bankers maintains such information in a secure manner only to the extent necessary to provide a record of the transaction for a reasonable period. Such information is then disposed of in a secure manner in accordance with PA Bankers' data disposal policy.

- iv. **Cookies.** Cookies are files that contain information created by a web server that can be stored on a User's hard disk for use either during a particular session ("per-session" cookie) or for future use ("persistent" cookie). PA Bankers uses cookies only to facilitate automated activity, store and track passwords, determine appropriate solicitations, and review navigation patterns. Cookies are not used to disseminate significant information about Users over the Internet or to analyze any information that Users have knowingly or unknowingly provided. When a user registers, the system will ask whether the user approves of the attachment of a cookie. Users may instruct their Internet browsers to opt out of accepting a "persistent" cookie and rather accept only a "per-session" cookie but will need to login each time they visit the site to enjoy the full benefits. If the user declines the attachment of any cookie, the user may not have access to the full benefits of the website. Registration enables the site to better determine members' interest areas and provide the most relevant information.
- v. **Other Sites.** The PA Bankers website contains links to other websites. PA Bankers has no control over and is not responsible for the information usage policies or content of such sites.

- 3. **PA Bankers' Mobile App.** This privacy notice for PA Bankers Association describes how and why we might collect, store, use, and/or share your information when you use our mobile app for things such as:
 - a. Download and use our mobile application, PA Bankers, or any other application of ours that links to this privacy notice.
 - b. Engage with us in other related ways, including any sales, marketing, or events

Information Collected Via PA Bankers' Mobile App. The PA Bankers Mobile App is directly connected to the PA Bankers website and, therefore, the same information contained in the information collected section above for the PA Bankers' website applies here as well. PA Bankers does not collect any personal information from users that are not signed into the website through the app. Once a user signs in through the app, almost all sections of the app are directly connected to the website, so the user is signed into the website. The only content that is available on the app that is not available to a user from the website includes handouts, venue information, session details, speaker bios, sponsor details, etc., for events the user has already registered for. This content is not visible to the user on the mobile app until they log in.

Sensitive Information. We do not process sensitive information when using the app.

Payment Data. PA Bankers does not process payments of any kind through the PA Bankers' Mobile App. If a member or customer wants to register for an event while using the app, they are directed to the registration portion of the PA Bankers' website where they must log in to register for an event. If they use a credit card to pay the registration fee, PA Bankers submits the information needed to obtain payment to the appropriate clearinghouse. PA Bankers maintains such information in a secure manner only to the extent necessary to provide a record of the transaction for a reasonable period. Such information is then disposed of in a secure manner in accordance with PA Bankers' data disposal policy.

Application Data. If you use our application(s) we also may collect the following information if you choose to provide us with access or permission:

- a. **Geolocation Information.** We may request access or permission to track location-based information from your mobile device, while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- b. **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's calendar, camera, contacts, storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- c. **Push Notifications.** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected in the PA Bankers app. We automatically collect certain information when you visit, use, or navigate the services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information such as your device characteristics, operating system, device name, device model and other technical information. This information is primarily needed for our internal analytics and reporting purposes. Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- a. **Device Data.** We collect device data such as information about your phone or tablet that you use to access the services. Depending on the device used, this device data may include information such as your application identification numbers and system configuration information.
- b. **Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the services. You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the services.

How do we process your information? We process your information to provide, improve, and administer our services; communicate with you for security and fraud prevention; and to comply with law. We may also process your information for other purposes with your consent. We process your personal information for a variety of reasons, depending on how you interact with our services, including:

- a. **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- b. **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES? We may use cookies and similar tracking technologies to access or store information. Since the mobile app is directly connected to the PA Bankers website, specific information about how we use such technologies and how you can refuse certain cookies is outlined in the "Cookies" item within the "Data Collected Via PA Bankers' Website" section above.

HOW LONG DO WE KEEP YOUR INFORMATION? We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives) then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE? We aim to protect your personal information through a system of organizational and technical security measures. We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic

transmission over the Internet or information storage technology can be guaranteed to be 100-percent secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our services is at your own risk. You should only access the services within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS? PA Bankers does not knowingly solicit data from or market to children under 18 years of age. By using the Mobile App, you represent that you are at least 18 years of age or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the services. PA Bankers does not collect personal data through the app, however, if we deem that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at pbawebsite@pabankers.com.

HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU? The PA Bankers app does not collect personal information about you. Personal information is contained within PA Bankers' member database. If you would like to review or update your personal information, please log into our website at www.pabankers.com. If you want to delete your record or personal information in the database, please submit a request to pbawebsite@pabankers.com.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our services. If you still have any questions or concerns, please contact us at pbawebsite@pabankers.com.