

# **COLONIAL SAVINGS, F.A.**

## Consumer Privacy Policy

## **Privacy of Consumer Financial Information**

Part 1016, Chapter X of Title 12 of the Code of Federal Regulation (Privacy of Consumer Financial Information) restricts the use of Consumer Financial Information and requires that certain disclosures be provided to consumers and customers prior to sharing their information with third parties.

Several additional laws, rules and regulations govern the handling of Consumer Financial Information. For example, the Fair Credit Reporting Act directs users of credit information as to the limitations of sharing information with affiliated companies. The Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN-SPAM) limits the ability of companies to sending marketing e-mail to consumers not their customers. Rules regarding Telemarketing, Children's Online Privacy and Telephone Consumer Protection impact our ability to interact with consumers and customers. Various state rules govern privacy issues for consumer interaction with Colonial and its websites, including collection of information, disclosure of tracking and use of "cookies."

### **Background:**

The Consumer Privacy Program that accompanies this Policy has been delegated to the Executive Compliance Committee as Owner.

### **Responsibility:**

Chief Compliance Officer  
Executive Committee  
Privacy Officer

The roles and responsibilities of Colonial's Board of Directors, Executive Management, Corporate Counsel, Chief Compliance Officer, Privacy Officer, Bank Management and Employees are outlined in Colonial's Privacy Program, which is incorporated herein by reference.

### **Terms and Definitions:**

**Consumer:** Consumer means an individual who obtains or has obtained a financial product or service from Colonial that is to be used primarily for personal, family, or household purposes, or that individual's legal representative. Consumers would include individuals who are loan applicants, ATM users, or those who are inquiring about a financial product or service who provide nonpublic personal information.

**Customer:** Customer means a consumer who has a customer relationship with Colonial, which is defined as a continuing relationship between a consumer and Colonial under which Colonial provides one or more financial products or services to the consumer that

are to be used primarily for personal, family, or household purposes. Examples of this type of relationship would be depositors and those whose loans Colonial services.

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## Policy Provisions

### 1. General

### Policy

It is the policy of Colonial Savings, F.A. and its operating divisions (“Colonial”) to respect the privacy of persons seeking information or services from us. Colonial employees are to keep consumer and customer information confidential. Colonial seeks to abide by the laws and regulations governing access to consumer and customer activity and information.

Colonial recognizes how important it is to our customers that sensitive information remains confidential. Our employees have been directed to abide by this Consumer Privacy Policy.

### 2. Categories of Information We Collect

We collect non-public personal information (as defined by Reg P) about consumers and our customers from the following sources:

- Information we receive from our customers on applications or other forms;
- Information about our customers’ transactions with us, , or others; and
- Information we receive from a consumer reporting agency.

### 3. Categories of Information We Collect on Our Websites

Colonial maintains multiple websites to be used by consumers and our customers. These websites may be in the name of Colonial, one of its divisions, or a third party for whom Colonial provides services. Persons may browse our websites anonymously. Colonial tracks which pages of our site are visited and we note users’ ID (host) addresses (as all web sites do automatically), but this tracking does not gather personal information about individuals. This tracking allows Colonial to identify current usage patterns in order for us to improve the information we provide. Colonial has the ability to gather specific information from web site users only when web site users elect to provide information to us such as in the case of users completing and transmitting a mortgage pre-qualification form, applying for consumer loans or applying to open a deposit account. Colonial’s digital ID allows the user’s browser to verify Colonial’s Internet identity every time a user visits our site. In addition, portions of Colonial’s site have encryption capabilities, making information

transmissions from or to consumers secure from third party interception.

#### **4. Sharing Consumer and Customer Information**

We do not disclose any non-public personal information about consumers who seek information about products and services, or our customers or former customers to anyone, except as permitted or required by law.

##### **Conducting our Business**

Colonial may provide customer information to third party companies in order for Colonial to conduct its normal business of originating and servicing loans and accepting deposit and transaction accounts. Information on accounts at Colonial may also routinely be reported to credit bureaus. Colonial may also provide customer information as provided on applications or other forms to marketing companies in order to facilitate Colonial's own marketing endeavors. Colonial and its affiliated companies, may enter into Joint Marketing Agreements with Third Party Companies to offer our customers products or services that we consider beneficial.

##### **Complying with Applicable Law**

Colonial is required to comply with various laws governing consumer information. This includes, for example, an obligation to report suspicious activity involving consumer accounts. Another example includes the requirement to permit access by regulators to information in the course of routine examinations. It is the express policy of Colonial to abide by the laws and regulations governing its operations. Colonial will report and allow access to consumer information only within the parameters set by the laws and regulations, or required by the courts.

#### **5. Colonial's Customer Privacy Principles**

In recognition of the high level of trust and confidence our customers have in Colonial, the following Customer Privacy Principles have been adopted as a guide for our officers and employees to follow in the use of customer information.

- We recognize and respect our customers' expectations of financial privacy.
- We restrict access to non-public personal information about our customers to only those employees who need access to the system containing customer information in order to perform their job.
- We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard customers' non-public personal information. We will continue to update these safeguards as technology changes occur.

- We limit the collection and use of customer information to the minimum necessary to offer and deliver the products and services that we provide.
- We do not reveal specific information about customer accounts or other personally identifiable data to unaffiliated third parties, unless (1) the information is provided to help complete a customer-initiated transaction; (2) the customer requests it; or (3) the disclosure is allowed or required by law.
- Whenever we hire other organizations to provide support services, we require those organizations to adhere to similar privacy principles.
- A copy of this policy is maintained at each of our branch and loan production offices and is available to the public upon request.

## **6. California Consumer Privacy Act**

Colonial complies with the privacy policy requirements of the California Consumer Privacy Act (CCPA) (as specified in its enacting regulation). Colonial does not sell information it obtains from consumers to third parties, nor does it share the personal information of California customers with its affiliates. Please see the Colonial's CCPA privacy notice, which gives additional information regarding the policy components required by the regulation.

## **7. Document Retention**

Each business unit is required, after January 1, 2020, to retain a copy of the privacy notice provided to a Colonial customer at account opening along with the copies of other account opening documents. This requirement includes customers for whom Colonial acquires servicing rights after origination.