# **Privacy Policy**

Effective Date: March 26, 2021

Last Revised on: March 26, 2021

Last Reviewed on: March 26, 2021

#### Introduction

Republic Bank & Trust Company, and its subsidiaries, (collectively, "Republic Bank," "Our" or "We") respect your privacy and are committed to providing a transparent notice of our privacy practices.

As you review this Privacy Policy, here are a few general principles to keep in mind:

- Republic Bank primarily offers personal, household or family financial products or services. If you are a consumer or customer of a personal, household, or family financial product or service, separate privacy practices may apply. Please refer to our <u>Privacy Notice</u>, at www.republicbank.com/privacy.
- If you are a California resident and not a consumer or customer of a personal, household, or family financial product or service, information we collect about you and your rights with respect to that information are described in the <u>Privacy Notice and Disclosure for</u> <u>California Residents</u>, at www.republicbank.com/ccpa.
- This policy describes the types of information Republic Bank may collect from you offline or when you visit our websites, including www.republicbank.com (our "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.
- Our online services are designed and intended to be accessed from the United States.

Please read this policy carefully to understand our policies and practices regarding your information and how We will treat it. This policy may change from time to time (see Changes to Our Privacy Policy). If you have questions after reviewing this policy, please contact us at InfoSecurity@republicbank.com.

# This policy applies to information We collect:

- on this Website;
- in email, text, and other electronic messages between you and this Website;
- through mobile and desktop applications you download, which provide dedicated non-browser-based interaction;
- when you interact with our employees or associates in person or on the phone, or through our call centers;

- when you provide us information offline, for example when you visit a bank branch location; and
- when you interact with our advertising and applications on third-party websites and services.

#### Information We Collect About You

We collect several types of information from and about you, including:

- Information provided by you, such as name, address, email address, telephone number, social security number, education, employment, financial information, username/password, limited location information (for example, a zip code to help you find a nearby ATM), and other personally identifying information.
- Information provided by third parties about you, such as from credit reporting agencies, lead generators, and tax preparation servicers; and
- Information collected automatically as you navigate through the site.
   Information collected automatically may include usage details, IP addresses, your internet connection, the equipment you use to access our Website, and information collected through cookies, web beacons, and other tracking technologies.

#### Republic Bank Mobile

For your convenience, Republic Bank offers you the ability to access some of our products and services through mobile applications and mobile-optimized websites ("Republic Bank Mobile"). When you interact with us through Republic Bank Mobile, we may also collect additional 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 will ask your permission before collecting certain information through Republic Bank Mobile. For the collection of location information, you may select whether to deny permission, permit collection each time that the app is utilized, permit collection only while the app is in use, or to permit collection even when the app is closed or not in use. Location information is used to enable delivery of relevant and timely information and is also be used to support advertising and promotion activities.

The Controls & Alerts App periodically collects, transmits, and uses geolocation information to enable features that prevent fraudulent card use and send alerts, but only if the End User expressly authorizes collection of such information. Geolocation information can be monitored on a continuous basis in the background only while the Solution is being used or not at all, depending on the End User's section. End Users can change their location permissions at any time in their device settings.

#### **How We Use Your Information**

- Processing applications and transactions;
- Verifying your identity (such as when you access your account information);
- Presenting our Website and its contents to you;
- Providing you with information, products, or services that you request from us;
- Providing you with notices about your account;
- Carrying out our obligations and enforcing our rights arising from any contracts entered into between you and us, including for billing and collection;
- Working with marketing partners to provide you with products or services that may be of interest to you;
- Preventing fraud and enhancing the security of your account or our online services;
- Responding to your requests and communicating with you;
- Managing your preferences;
- 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 marketing messages;
- 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);
- Fulfilling any other purpose for which you provide it and in any other way We may describe when you provide the information;
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies;
- For any other purpose with your consent; 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.

#### Disclosure of Your Information

We may disclose information that Republic Bank collects, or you provide as described in this privacy policy:

- to our subsidiaries and affiliates, subject to our <u>Privacy Notice</u> at www.republicbank.com/privacy;
- to contractors, service providers, and other third parties We use to support our business;
- to retailers and other third parties to market to you, subject to our <u>Privacy</u>
   Notice at www.republicbank.com/privacy;
- 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 Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Company about our Website users is among the assets transferred;
- to fulfill the purpose for which you provide it (for example, to service your financial account, to process your inquiry regarding a Republic Bank product or to purchase a home.);
- for any other purpose disclosed by us when you provide the information; and
- for any other disclosure with your consent.

We may also disclose your Personal Information:

- to comply with any court order, law, or legal process, including to respond to any government, regulatory, or law enforcement request;
- to enforce or apply our Terms and Conditions and other agreements, including for billing and collection purposes; and
- if We believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers, or others (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

We may disclose aggregated information about our users, and information that does not identify an individual.

# **Consumer Financial Privacy Notice**

If you have inquired about or obtained a personal or household financial product or service from Republic Bank, please also carefully read Republic Bank's consumer <u>Privacy Notice</u> at www.republicbank.com/privacy, that applies to you below to understand how your information is protected.

**Children Under the Age of 16** 

Our Website is not intended for children under 16 years of age. No one under age 16 may provide

any information to or on the Website. We do not knowingly collect Personal Information from

children under 16. If you are under 16, do not use or provide any information to or on this Website or through any of its features. If We learn We have collected or received Personal

Information from a child under 16 without verification of parental consent, We will delete that

information. If you believe We might have any information from or about a child under 16, please

contact in one of the ways provided in the Contact Information section, below.

**Social Security Number Protection Policy** 

Social Security numbers are classified as "Confidential" information under Republic Bank's

Information Security and Privacy Policies. As such, Social Security numbers may only be accessed

by and disclosed to Republic Bank associates and others with a legitimate business purpose in

accordance with applicable laws and regulations. Social Security numbers, whether in paper or

electronic form, are subject to physical, electronic, and procedural safeguards, and must be

stored, transmitted, and disposed of in accordance with the provisions of the Information

Security Policy applicable to Confidential information. These restrictions apply to all Social

Security numbers collected or retained by Republic Bank in connection with customer, employee,

or other relationships.

**Data Security** 

We have implemented reasonable measures designed to secure your Personal Information from

accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and

security of your information also depends on you. Where We have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping

this password confidential. We ask you not to share your password with anyone.

**Changes to Our Privacy Policy** 

It is our policy to post any changes We make to our privacy policy on this page.

**Contact Information** 

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Tel: 1-888-584-3600

E-mail: InfoSecurity@republicbank.com

FACTS	WHAT DOES REPUBLIC BANCORP DO WITH YOUR PERSONAL INFOR		
Why?	inancial companies choose how they share your personal information. Federal law gives onsumers the right to limit some but not all sharing. Federal law also requires us to tell you how e collect, share, and protect your personal information. Please read this notice carefully to nderstand what we do.		
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include:  Social Security number and payment history transaction history and credit history credit card or other debt and employment information  Then you are no longer our customer, we continue to share your information as described in his notice.		
How?	I financial companies need to share customers' personal information to run their everyday usiness. In the section below, we list the reasons financial companies can share their customers' ersonal information; the reasons Republic Bancorp, Inc. chooses to share; and whether you can nit this sharing.		
Reasons we can	share your personal information	Does Republic Bancorp, Inc. share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No
For our marketing purposes– to offer our products and services to you		Yes	No
For joint marketing with other financial companies		No	We don't share
For our affiliates' everyday business purposes—information about your transactions and experiences		No	We don't share
For our affiliates' everyday business purposes–information about your creditworthiness		No	We don't share
For affiliates to market to you		No	We don't share
For nonaffiliates to market to you		No	We don't share
Questions?	Call 1-888-584-3600 or go to www.repub	licbank.com	

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Who we are		
Who is providing this notice?	The bank subsidiaries of Republic Bancorp, Inc. commonly known as Republic Bank.	
What we do		
How does Republic Bancorp, Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.	
How does Republic Bancorp, Inc. collect my personal information?	<ul> <li>We collect your personal information, for example, when you</li> <li>open an account or apply for a loan</li> <li>use your credit or debit card or make deposits or withdrawals from your account</li> <li>provide employment information</li> <li>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</li> </ul>	
Why can't I limit all sharing?	Federal law gives you the right to limit only  • sharing for affiliates' everyday business purposes –information about your creditworthiness  • affiliates from using your information to market to you  • sharing for nonaffiliates to market to you  State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.	
Definitions		
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include companies with a common corporate identity of Republic Bancorp, Inc.	
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Republic Bancorp, Inc. does not share with nonaffiliates so they can market to you	
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.	

# Other important information

For California residents only: In accordance with California law, we will not share information we collect about California residents with nonaffiliated third parties except as permitted by law, such as with the consent of the customer, to service the customer's accounts, or to fulfill rewards or benefits. We will also limit the sharing of information about you with our affiliates to the extent required by applicable California law.

• Republic Bancorp, Inc. doesn't jointly market.

# Vermont Residents:

- We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.
- Additional information concerning our privacy policies can be found at www.republicbank.com or call 1-888-584-3600.

**North Dakota Residents:** We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account.