

(VERSION EFFECTIVE DATE: JANUARY 2021)

INTRODUCTION AND SCOPE OF POLICY

This Helm Bank USA Digital Privacy and Cookies Policy ("Policy") applies to your interaction with Helm Bank USA ("Helm Bank," "we," "us," "our"), at any online or mobile site or application that we own and control ("site"), unless a different online and/or mobile or other privacy policy is posted at a particular site, or is made available to you and by its terms supplants this Policy. Other privacy policies may also apply in addition to the terms of this Policy.

ADDITIONAL PRIVACY POLICIES AND NOTICES

Certain additional Helm Bank privacy-related policies and notices may apply, including our Privacy Policy. The additional policies and notices also include the Helm Bank Consumer Privacy Notice, which applies to U.S. customers and consumers as described in that notice and various international privacy policies, which apply to information collected by us outside of the U.S. as described in those policies. You may also receive an additional privacy notice in connection with your use of a particular product or relationship with a specific business. This policy also explains certain data use and protection functionalities and practices of our online ads, such as banner ads, on third party sites. Please note that where we have another type of presence on a site owned by a third party, such as a page or handle on a social media site, that third party's privacy policy and terms of use, rather than this Policy, will govern, unless specifically stated otherwise.

AGREEMENT TO POLICY

By using a Site or interacting with a Helm Bank advertisement or page or account on a third party site, you consent to this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

GATHERING, USING, AND SHARING INFORMATION

TYPES OF INFORMATION

You may interact with us in a variety of ways online, including through a mobile device. We may offer sites or applications that permit browsing and do not require registration. We may also offer the ability to enroll, register or access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, address, email address, other contact information; data resulting from your activity, such as transaction information; location information; and biometric information, such as a voiceprint, for example. If you choose to enroll in verification by voiceprint. We may also gather additional information, such as the type of device and browser you are using, the IP address of your device, information about your device's operating system, and additional information associated with your devices. We may also gather information collected through cookies, tags, and other technologies, as described further below.

ABOUT "COOKIES" AND AD CHOICES ON THIRD PARTY SITES

Cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server. Mobile applications may also use cookies.

We use cookies and information gathered through their use to make your experience with Helm Bank and certain other sites richer and more personalized based on the products, services, or other interaction you have with us and

other sites. Information gathered through use of cookies may be used to make offers to you via online ads, enaukm U.S. mail, or telephone, subject to the privacy preferences you have on file with Helm Bank. (Privacy preferences for employer-sponsored retirement accounts default to no marketing, solicitation or sharing for marketing purposes without specific consent.) We also use cookies in online advertising either on our own Site or on third party sites to help determine which of our advertisements are most likely to appeal to you.

If you use multiple browsers or devices, information that we collect about you from one particular browser or device may be used to provide advertising or collect information on another browser or device. Information may also be transferred to a third party for advertising or information collection on behalf of Helm Bank. Please note that your choice to opt out on a particular browser or device will apply only to the collection and use of information from that particular browser or device. Opting out on a particular device will not opt you out of information collection on other devices, nor will it limit cross device sharing on those other devices. If you use different browsers on a device or multiple devices, for each browser and device you wish to opt out, please out reach device and browser separate.

Industry standards are currently evolving and we may not separately respond to or take any action with respect to a "do not track" configuration set in your internet browser.

Other parties that may collect information about your web browsing behavior when you use our Site are generally limited to service providers who may only use any information collected to provide services and marketing for us and not to provide services or advertising for any other party. Note, however, that we also provide certain widgets or tools on our sites that allow you to interact with third parties who provide these features, such as tools that allow web surfers to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our Site, such as a map. These widgets, tools, and informational items often function through the use of third party cookies utilized by the third party site, such as the social media platform. As a result, these third parties may have access to information about your web browsing on the pages of our Site where these widgets, tools, or information are placed. You may wish to review information at third party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

We also use cookies for purposes such as maintaining continuity during an online session, gathering data about the use of our Site, monitoring online promotions and anti-fraud and information security purposes.

DO YOU HAVE TO ACCEPT COOKIES?

You may be able to set your browser to reject browser cookies. However, if you choose to reject cookies, you cannot access your accounts online with Helm Bank. Therefore, if you set your browser options to disallow cookies, you will limit the functionality we can provide when you visit our Site. The latest versions of internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by browser providers for more specific information, including how to use these tools.

ADDITIONAL COOKIES

Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We do not use this technology for online behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our Site.

ADDITIONAL TECHNOLOGIES

We may also use additional technologies such as pixel tags, web beacons, and clear GIFs, and may permit our third party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or others communications, determining viewing and response rates, and determining which offers to present to you on our own or on third party sites.

USING INFORMATION

In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Site, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, and length of user sessions in order to evaluate the usefulness of our sites; and using read-receipt notifications in our mail communications.

SHARING

We may share information with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. As applicable, please see the additional privacy policies referenced above, such as the Helm Bank Consumer Privacy Notice, for more information on how we may share information with affiliates and third parties.

CHILDREN'S PRIVACY

Our Sites are not directed to children under the age of 18, and they do not knowingly collect personal information from such children.

POLICY UPDATES AND EFFECTIVE DATE

If we make updates to this Policy, we will update the Policy with the changes and revise the "date of most recent update" posted at the top of this Policy. Any updates to the Policy become effective when we post the updates on the Site. Your use of the Site following the update to the Policy means that you accept the updated Policy.