



FreedomRoad Financial Online Privacy Statement

FreedomRoad Financial recognizes the importance our customers place on the privacy and security of their personal information. Our goal is to protect your personal information in every way that we interact with you, whether it's on the telephone, in our lobby, at one of our ATMs, or on the Internet. While our privacy policies are the same whether you are online or not, we have extra measures in place to protect your privacy when you bank online with FreedomRoad Financial.

We think it is important for you to be informed of the policies, procedures, and security measures we have in place to safeguard your personal and confidential information. With that in mind, we have developed this policy to help you to understand the steps we take to protect your personal information when you utilize our Internet services.

FreedomRoad Financial may utilize the services of third party providers to assist us in providing online services, such as website hosting, online banking, bill payment, and aggregation services. These third party providers are referred to within this policy as "service providers".

Information Collected on the Internet

If you are just browsing through our website, we do not request any personally identifiable information, nor do we collect unique identifying information about you unless you voluntarily and knowingly provide us that information, such as when you send us an email or complete an application online. If you provide us this information, it is only used internally and in furtherance of the purpose for which it was provided.

As part of providing online financial products or services, we may obtain information about our customers and website visitors from the following sources:

- Information we receive from you on applications, emails, or other forms;
- Information about your transactions with this institution and our affiliates;
- Information we receive from a consumer-reporting agency;
- Information that is generated electronically when you visit our website; and
- Information that is generated electronically when you use our online banking services.

Service providers hosting our website and our online banking service may collect general information on our website visitors simply to help us provide banking and other financial services to you online. They collect the following information on our behalf for security and statistical purposes:

- The Internet address (referral site) which brought you to our website;

- The date and time you access our site;
- The name and version of your web browser;
- The Internet service provider you used when you accessed our site;
- Your Internet Protocol (IP) address; and
- The pages visited in our website.

Our service providers may use cookies to collect some of the above information. They may also use cookies for security purposes within our online banking product. Additionally, cookies may be used for customization and personalization of our website.

Additional information about IP addresses and cookies are provided below.

Internet Protocol (IP) Addresses

An IP address is a number that is automatically assigned to your computer whenever you are on the Internet. Web servers, the computers that "serve up" web pages, automatically identify your computer by its IP address. When collecting information for us, our service provider does not link IP addresses to anything personally identifiable; however, this Institution and its service providers may use IP addresses to audit the use of our site. We can and will use IP addresses to identify users when necessary for security purposes.

What is a Cookie?

A cookie is a very small text file sent by a web server and stored on your hard drive, your computer's memory, or in your browser so that it can be read back later. Cookies are a basic way for a server to identify the computer you happen to be using at the time. Cookies are used for many things from personalizing start-up pages to facilitating online purchases. Cookies help sites recognize return visitors and they perform a very important function in secure online banking.

Our service provider uses cookies for security purposes within our online banking product and to facilitate the customization and personalization of our website. For your security, our service provider does not store any personally identifiable information in cookies, which are further described below.

Online Banking Cookies

Our online banking product uses encrypted cookies that do not pass to your computer's hard drive. Instead, the cookie is stored in your computer's memory, identifying only your computer while you are logged on. Only our service provider can read the information in these cookies. The online banking cookie facilitates the processing of multiple transactions during a session without requiring you to reenter your passcode for each individual transaction. The cookies for online banking simply provide another level of security for our Online banking product. When you log off, or close your browser, the cookie is destroyed. A new cookie is used for each session. That way, no one can use the prior cookie to access your account. For additional security, the [online banking session](#) expires after 10 minutes of inactivity. It must then be renewed by reentering your passcode. [A new cookie](#)

will be issued upon the next login. We do not (and cannot) use this cookie to collect or obtain new personal information about you. You must allow your browser to accept this cookie so you can use the online banking product.

Website Cookies:

When you click on advertisements in our website or advertisements on linked third party websites, you may receive another cookie. You do not have to accept these cookies to visit the website.

Use of Information Collected

- We do not disclose any non-public personal information about our customers, former customers, and website visitors to anyone, except as permitted or required by law.
- In order to provide online services such as online banking and bill payment, we must disclose certain customer account information to our service providers.
- We do not sell any of your personal information.
- We will not disclose any medical information that you provide to us, unless you specifically authorize its disclosure.
- We may disclose aggregate (not personally identifiable) customer information that we collect on our website to service providers, companies, and/or financial institutions that perform marketing and research services on our behalf and with whom we have joint marketing agreements. Our contracts require these service providers, companies and/or financial institutions to protect the confidentiality of your personal information to the same extent that we must do.

External Third Party Links

Our website may include numerous links to other third party sites. These links to external third parties are offered as a courtesy and a convenience to our customers. When you visit these sites, you will leave our website and will be redirected to another site.

FreedomRoad Financial does not control linked third party sites. We are not an agent for these third parties nor do we endorse or guarantee their products. We make no representation or warranty regarding the accuracy of the information contained in the linked sites. We suggest that you always verify the information obtained from linked websites before acting upon this information. Also, please be aware that the security and privacy policies on these sites may be different from our policies, so please read third party privacy and security policies closely.

If you have questions or concerns about the privacy policies and practices of linked third parties, please review their websites and contact them directly. This privacy policy applies solely to information collected by this institution.

Security

FreedomRoad Financial and its service providers have developed strict policies and procedures to safeguard your personal information. We restrict employee access to your sensitive personal information on a "need to know" basis. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information. We educate our employees about the importance of confidentiality and customer privacy. We take appropriate disciplinary measures to enforce employee privacy responsibilities.

Our online banking service provider has developed a top-of-the line security system to ensure your customer information is protected on the Internet and within the data center environment.

User Name & Password

Access to your account information via the Internet and the ability to complete transactions on your account is possible only with your valid user name and password combination. Your user name and password should be treated with the same care and confidentiality as your ATM card or debit card and PIN combination. You should avoid saving your password on your computer's hard drive to prevent someone from gaining access to your account via the Internet. You should also use a unique user name and password for your online banking account. Please note that FreedomRoad Financial will never ask you for your password. If you ever believe your user name and password have been misused, you should notify us at once by calling 1-866-455-ROAD (7623), by sending us an email at FreedomRoad@FRF1.com, or by writing to us at: FreedomRoad Financial Customer Service, 10509 Professional Circle, Suite 202 Reno, Nevada 89521.

If sending an email, do not include any confidential information.

Logging Out

It is recommended that you completely log out of the FreedomRoad Financial Online Banking service and close all instances of your browser when you finish transacting business with us. This will prevent an unauthorized user from obtaining access to your information while your connection is still open.

If you do not perform any activity while you are connected to the FreedomRoad Financial Online Banking service for more than 10 minutes, you will be logged out automatically.

Encryption

Information you provide us or that we provide you, and any instructions you make to us via our online banking service are encrypted. This means that the information shared between your browser and FreedomRoad Financial is scrambled using an algorithm and then decoded once it is received by us or by you using a decoder that is stored in your browser. We use, and require you to use and receive, 128-bit encryption. Note that e-mail communication is not encrypted in this

manner. Do not send confidential information or instructions to us via e-mail. For more information, read the following section regarding email.

Email Policy

We may send you email notices for certain required disclosures if you agree to accept electronic disclosures and/or online account statements. If you have agreed to accept disclosures electronically, we may send you an email with updates to this policy and/or we may send you an email at least annually to remind you where the Privacy Policy can be viewed from our website. For more information on how to enroll for electronic disclosures, please contact us at 1-866-455-ROAD (7623).

We may also send you emails marketing our products and services. We will always provide you an opportunity to opt-in or opt-out of email advertising promotions as required by law. Email communications between you and us are not encrypted, as are communications through FreedomRoad Financial's Online Banking service. For that reason, you should refrain from sending us confidential information via email. We will likewise refrain from sending you confidential information using this method. If you wish to communicate confidential information to us, you can send us a secured message through the online banking site, which will be encrypted as described in the above section.

Viruses and Malware

We take precautions against computer viruses and malware by constantly scanning our site for malicious code. It is recommended that you use one of the commercially available software applications to do the same with your computer.

Children's Online Privacy

Protecting the identity and privacy of children is a responsibility that we take very seriously. The responsibility to protect this information rests with both the online industry as well as with parents. We do not knowingly collect, use, or maintain any information through our websites about children who are under the age of 13. If we determine that a child under the age of 13 has provided us with information through one of our websites, we will only use this information to notify the parents that the information was received.

Parents can avail themselves of various filtering software packages that are available to prevent their children from accessing websites which they deem to be inappropriate. Parents can choose to utilize this and other methods to limit websites to which their children have access.

Changes to this Online Privacy Policy

We may change this Online Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new "Last Updated"

date. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise

Comments or Complaints by Customers

Any comments or complaints about these policies, any privacy-related issue or any inaccuracy in customer data can be made by contacting:

FreedomRoad Financial
10509 Professional Circle, Suite 202
Reno, Nevada 89521