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Notice of Privacy Policy Citizens Financial Group

Citizens Financial Group (Citizens) respects and values your privacy. This Privacy Policy describes how Citizens and its affiliates collect, use, share, and protect your Personal Information. This Privacy Policy applies to our customers, employees, and any other individual from whom we collect Personal Information.

Citizens refers to all Citizens affiliates, such as Citizens Bank N.A., Citizens Securities Inc., Clarfeld Financial Advisors, LLC, and Estate Preservation Services, LLC; divisions, such as Consumer Banking and Commercial Banking; and brands, such as Citizens Bank, Citizens Access, Citizens One, and Clarfeld Citizens Private Wealth.

The term "Personal Information" means information that alone or when in combination with other information may be used to readily identify, contact, or locate you, such as: name, address, social security number, email address, financial account number, or phone number.

In addition, Citizens adheres to the following privacy principles:

- We do not sell your Personal Information.
- We do not allow those who are doing business on our behalf (i.e., our service providers) to use your Personal Information for their own marketing purposes.
- We contractually require any person or organization providing products or services on our behalf to protect your Personal Information.
- We may share your Personal Information and permit others to use that information if you give us your consent, it is necessary to originate or service a transaction you request, it is necessary to facilitate job applicant and employment processes at Citizens, or it is otherwise permitted by law.
- We handle Personal Information about former and prospective customers and noncustomers the same as existing customers.
- We handle Personal Information about Citizens former and prospective employees the same as existing employees.

If we change our privacy practices set forth in this Policy, we will make updates to this Policy and will provide additional notification to you, where required by law.

For our Consumer Banking customers, please click the following link for our [Consumer Privacy Notice](#).

HOW WE USE YOUR PERSONAL INFORMATION

We use your Personal Information for reasons such as:

- Facilitating the processing and servicing of your requested transactions;
- Confirming your identity and preventing, detecting, and monitoring for fraudulent activity on your accounts;
- Marketing our products and services to you and tracking the effectiveness of our advertisements;
- Improving our products and services and ways to better service your requests and/or inquiries;
- Responding to your feedback and inquiries;
- Monitoring website or mobile usage and/or performance;
- Remembering your personal settings and preferences for good customer experience;
- Developing and offering you additional options or enhancing your online experience;
- Providing you personalized insights into the usage and management of your accounts;
- Ensuring technological compatibility with your computer and mobile devices;
- Facilitating our employment processes for Citizens employees and job applicants; and
- Performing other activities as required by law.

We also use anonymized or de-identified information for analysis to understand more about our customers and our industry, or for commercial purposes permitted by law. This information is not Personal Information.

WHAT PERSONAL INFORMATION WE COLLECT

We collect your Personal Information in different ways depending on how you interact with us. For example, we collect your Personal Information from:

- interactions with our corporate and social media websites and mobile environments through the use of cookies, pixels, web beacons and other similar technologies;
- interactions with our online advertisements;
- mobile device interactions with physical hardware beacons/nodes where Citizens conducts business (e.g., branches, ATMs, and sponsorship and marketing events);
- applications and other forms related to our products and services;
- conversations and online chats with Citizens representatives;
- transactions or experiences with us, such as payments, underwriting, and servicing;
- service providers, including consumer reporting agencies and marketing agencies;
- employment applications and processes for those who apply for employment at Citizens.

Depending on your relationship with us, the categories of your Personal Information we collect may vary but include:

- Your demographic information such as name, current address, and social security number
- Information about you such as your birth date, prior addresses and marital status
- Information about your accounts with us such as account numbers and account username
- Information about your financial standing such as credit score and credit history
- Your employment information such as current and prior employers and incomes
- Your internet/electronic network activity information such as your internal protocol (IP) address and geolocation data
- Your mobile device identifier and geolocation data
- Your education information such as degrees held and years of schooling
- Characteristics of protected classifications such as military/veteran status and ethnicity

HOW WE SHARE YOUR PERSONAL INFORMATION

We share your Personal Information among our affiliates, defined in the “WHO WE ARE” section above, to offer additional products and services to you. This sharing occurs only within the Consumer Banking division. In addition, we share your Personal Information with our contracted service providers for the uses described in the “HOW WE USE YOUR PERSONAL INFORMATION” section above. The categories of third parties with which we share your Personal Information include:

- loan and transaction servicers;
- marketing service providers;
- credit reporting agencies;
- technology service providers;
- employment service providers for Citizens job applicants and employees.

You authorize us to share, and you consent to our sharing, your mobile subscriber details with service providers which will request your mobile carrier to use your mobile subscriber details for verifying your identity. Those details may include name, billing address, email, and phone number. This information may also include location information, if available. Additional use of your mobile subscriber data may be subject to third party privacy policies.

We do not sell or otherwise share your Personal Information with third parties.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We take our responsibility to protect your information very seriously. We use reasonable physical, technical, and procedural safeguards to secure your information from unauthorized use, access, alteration or disclosure. Please see Security section for additional information.

WHAT YOUR PRIVACY RIGHTS ARE AND HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

Various jurisdictions have enacted laws that may afford you different privacy rights regarding your Personal Information. These privacy rights are as follows:

For California Residents under the California Consumer Privacy Act (CCPA):

California residents have the right to request a copy of the categories or specific pieces of Personal Information a business has collected about them or to request deletion of certain Personal Information. Prior to processing your request and to protect your Personal Information, Citizens will perform reasonable processes to verify your identity which will require you to provide certain information for us to confirm against independent sources.

To submit a request to access your Personal Information we collect or to submit a deletion request for certain Personal Information click on the link to access our [CCPA Privacy Rights Portal](#) or call 1-888-999-1927.

In addition to your privacy rights to request or delete your Personal Information, CCPA also provides you with the right:

- not to receive discriminatory treatment by any business for exercising your privacy rights under CCPA;
- to authorize an agent to exercise your privacy rights on your behalf. Your authorized agent can submit a request by calling 1-888-999-1927.
- submit a request to access or delete household information. However, Citizens does not collect or process household information. For inquiries and requests related to households you can contact 1-888-999-1927.

For Customers to limit information sharing among Citizens affiliates for marketing purposes:

To limit the sharing of your Personal Information among Citizens affiliates you can submit a mail-in form included with our Consumer Privacy Notice or call 1-877-229-6430. For **Citizens Access** customers, you may ONLY request changes by calling 888-201-6505 Mon-Fri 8:00am-10:00pm ET; Sat. 9:00am-3:00pm; Sun. 10:00am-3:00pm.

For European Union Residents under the General Data Protection Regulation (GDPR):

GDPR affords certain privacy rights to individuals that are physically located in the European Union (EU) with whom Citizens has directly engaged in business activities, including marketing, within an EU jurisdiction. At Citizens, GPPR applicable activities are limited to Clarfled Financial Advisers, LLC and if you are Commercial Customer residing in the EU. No other Citizens affiliates or divisions engage in such business activities within EU jurisdictions.

GDPR provides these individuals with the right to request:

- to access and get copies of the Personal Information held by us about you;
- to restrict or object to the processing of your Personal Information, or request that your Personal Information is erased;

- to receive a copy of the Personal Information which you have provided to the firm, in a structured, commonly used and machine-readable format (known as “data portability”);
- to correct any incomplete or inaccurate Personal Information that we hold about you;
- where you have provided Personal Information voluntarily, or otherwise consented to its use, the right to withdraw your consent.

Prior to processing your request and to protect your Personal Information, Citizens will perform reasonable processes to verify your identity which will require you to provide certain information for us to confirm against independent sources.

For Clarfeld customers: For questions about your privacy rights under GDPR or to exercise your privacy rights under GDPR, contact Joy Soodik, Managing Director and Chief Compliance Officer, at 914-846-0100

For individuals related to our Commercial Customers residing in the EU: For questions about your privacy rights under GDPR or to exercise your privacy rights under GDPR, contact clientservices@citizensbank.com or 1-877-550-5933 or non-toll free 401-282-1362, Mon – Fri 7:00am – 7:00pm ET.

General Marketing Preferences

We offer you additional choices to limit our marketing to you including limiting our mail, telephone, and email marketing. Please contact us at 1-800-922-9999 24 hours a day, 7 days a week or please visit <https://www.citizensbank.com/customer-service/contact-us.aspx>. For **Citizens Access** customers, please call 888-201-6505 Mon-Fri 8:00am-10:00pm EST; Sat. 9:00am-3pm; Sun. 10:00am-3:00pm.

CHILDREN'S ONLINE PRIVACY

Our online services are not intended for the use of children under the age of 13. We do not knowingly collect or retain any Personal Information from individuals under the age of 13 online. To learn more about the Children's Online Privacy Protection Act (COPPA) please visit the Federal Trade Commission's Website at <https://www.ftc.gov/>.

OTHER IMPORTANT INFORMATION RELATED TO THE USE AND CONTROL OF YOUR INFORMATION

Links to Third Party Websites including Financial Data Aggregators

Our Site and mobile applications may contain links to third party websites that link our products/services to Financial Data Aggregators (FDAs) when you choose to utilize services offered by FDAs. For more information on FDAs click [HERE](#). Our Site may also contain information from third party sites or provide tips and tools related to fraud prevention or links to governance regulator websites for additional information. These links, pointers, and information from third party websites or applications are not part of our Site. Citizens does not make any representations or warranties regarding these third party websites. We are not responsible for any losses or damages in connection with the information, security, privacy practices, availability, content or accuracy of materials of such third party websites or applications. These third party websites or applications might have Terms of Use or Privacy Policies different from us and third party websites may provide less privacy and/or security than our Site. We encourage you to review the Terms of Use and Privacy Policy of all third party websites before you share any personally identifiable information with them.

Physical Hardware Beacons at Our Bank Locations

Our customer-facing physical locations such as branches, ATM vestibules, and Citizens sponsorship/marketing events may also utilize your mobile device location services to identify when you are in or around one of our physical locations. You will be prompted to allow Citizens access to your location services. We may use your

location services including your mobile device identifier to communicate with you including welcoming you to our properties, targeting advertisements, or offering other services such as automatically unlocking an ATM vestibule as you approach and locating a nearby branch. When you download our app you are provided additional information on this data collection and how to enable or disable the sharing over your mobile device information. You can enable/disable location sharing for our mobile applications within Settings of the Citizens Bank Applications on your own device at any time.

Use of Artificial Intelligence to Enhance Your Customer Experience

When you use our mobile application, we utilize Artificial Intelligence (AI) based software to analyze your financial transaction history and provide you with personalized insights into your account activity over time to assist with managing your finances. For example, notifying you when your paycheck is direct deposited; alerting you when you have a payment scheduled but not enough funds in your account; and providing suggestions on performing certain activities to save money. You consent to the use of this software when you accept the terms and conditions of our mobile application.

Third Party Widgets

Please also be aware that we allow certain widgets (e.g., social share buttons) on our Sites that enable users to easily share information on another platform, such as a social media platform. The third parties that own these widgets may have access to information about your browsing on pages of our Sites where these widgets are placed.

Cookies

Cookies are small text files that are placed on your computer to distinguish you from other visitors to our Site. The use of cookies helps us to improve your experience on our website by providing data on which of our website's features and services are popular. The use of cookies is a standard practice. We or our third party advertising service providers may place cookies or similar files on your hard drive.. Certain web browsers can inform you every time a cookie is being sent to you and certain web browsers allow you to choose not to accept cookies. You can also delete cookies from your computer at any time. If you refuse cookies, the functionality of our website may be impacted or become non-functional. Since every browser and computer is different, you will need to follow your browser's instructions for disabling or deleting cookies.

Pixels, Web Beacons, and Other Technologies

We or our third-party advertising service providers may also use technologies to track users' interactions with our Site. Some of these technologies include web beacons (transparent graphical images placed on a website), pixels, tags, and Flash objects (also referred to as "Local Shared Objects"). Please refer to your browser's instructions to remove cached Sites, history, and images from your Computer.

Additional Information on Online Behavioral Advertising

We and other third parties may collect information about your online activities over time and across different websites when you use our Site. Some of the advertisements that click-through to our Site and/or may be on our Site contain cookies that allow for the monitoring of your response to these advertisements (sometimes referred to as interest-based advertisements), to help understand campaign effectiveness. This information is used by us and others to, analyze and track data, determine the popularity of certain content, and deliver content targeted to your interests on our Services and other web sites, to better understand your online activity. Our advertisements may also appear on other websites that use the same advertising service providers as us. These advertising service providers may use your browsing history across websites to choose which advertisements to display to you.

We currently do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit our websites or use our services.

If you do not wish to have us or our third-party advertising service providers know which advertisements and subsequent websites you have viewed, you may opt-out at AboutAds (established by the Digital Advertising Alliance). The Digital Advertising Alliance website contains important information on cookies, behavioral advertising, and what opting out will and will not do and choices you can make regarding interest-based advertisements.

Please note: opting out of behavioral advertising will not stop you from receiving advertisements. You will still see the same number of advertisements as before, but they may not be as relevant to you. If you use other Computers or browsers and want to opt out of interest based advertisements, you will need to repeat this process for each Computer or browser. If you delete your Cookies and want to continue to be opted out of interest based advertisements you will have to repeat this opt-out process.

Secure Submission of Personal Information

Please only submit Personal Information to Citizens through secure channels such as online applications, over the phone, or as otherwise directed by a Citizens representative. Do not provide sensitive Personal Information, such as your social security number or account number, in public forums, such as social media websites. Please carefully review the Terms of Use and Privacy Policies on these social media and other sites as they may be different than our own policies.

CONSUMER PRIVACY NOTICE

Click the following link for the [**Citizens Access Privacy Notice**](#)

Questions/Contact Us

Questions? Please contact us at 1-800-922-9999 24 hours a day, 7 days a week or please visit

<https://www.citizensbank.com/customer-service/contact-us.aspx>

For **Citizens Access** customers, please call 888-201-6505 Mon-Fri 8:00am-10:00pm ET; Sat. 9:00am-3:00pm; Sun. 10:00am-3:00pm.

Updates to this Policy

We may change this Privacy Policy from time to time by updating this page. Please check this Policy regularly to ensure that you are familiar with its contents.