

At Bask Bank, a division of Texas Capital Bank, your online privacy is important to us. This Online Privacy Policy explains the collection, use, sharing, and protection of data and information that we gather from you when you use our website (“Site”) and the websites of partner institutions that directly link to this Policy. Our Online Privacy Policy covers the functions and services available through our Site and mobile application. By continuing to use our Site, you consent to the practice identified in this Policy.

Our Online Privacy Policy is subject to change. We will inform you of these changes by posting the Policy to this page and revising the date listed at the top of the page. By continuing to use our Site following the posting, you consent to the modified Online Privacy Policy. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

#### **INFORMATION WE COLLECT**

##### ***Personal Information***

When you visit our Site, we may collect Personal Information that you provide to us, including but not limited to:

- First, middle, and last name
- Home or other physical address
- Email address
- Telephone number
- Location information
- Date of birth
- Username associated with your account
- Details about devices used to access our websites or mobile applications such as IP address, browser information, device information, and operating system. This is discussed further below.

##### ***Other Online Information***

We collect other information when you visit our Site, use our mobile application or interact with our advertisements, even if you are not using our services or do not provide this information directly to us. We may collect this behavioral information in a variety of ways, including but not limited to:

- **Cookies:** Cookies are small pieces of data that are stored by your internet browser directly on the device you are using. Cookies help track technical and navigational information such as time you spend on the Site, your browser type, and the specific pages that you have visited.
- **Flash objects (also “Local Shared Objects”):** Flash objects determine browser type to ensure that you can view all the content on our Site, and they help us recognize you and your device when you revisit our Site.
- **Web beacons:** Web beacons are objects that are embedded in a webpage and usually invisible to the user. They track who is visiting our Site.
- **IP Address:** An IP Address is automatically assigned to your device by your Internet Service Provider and is automatically recorded and logged when you visit our Site.
- Other use-tracking technologies that we may use from time to time and as technology changes.

#### **HOW WE USE YOUR INFORMATION**

Collecting Personal Information and Other Online Information allows us to optimize the services we offer you. We use this information in a number of ways, including but not limited to:

- Processing applications and transactions
- Verifying your identity, including when you access your online account
- Responding to inquiries and communications from you
- Improving our business operations and developing new products and services
- Assessing and informing you about the services and products that might interest you
- Providing you important information about our Site
- Protecting the rights, property, or personal safety of Texas Capital Bank, its users and/or the public
- Complying with legal requirements
- Other purposes we may specifically disclose at the time we collect information

## HOW WE SHARE YOUR INFORMATION

We share information we collect from or about you in accordance with our [Customer Privacy Notice](#). This Notice describes the information collected and your choices regarding the sharing of this information.

We disclose Personal Information and Other Online Information as required by law and to third-party affiliates and servicers in connection with the processing, administration, and servicing of your account. These affiliates are only authorized to use and disclose your information as needed to perform services on our behalf or to satisfy legal requirements. At times, we may also disclose your information to meet legal requirements, cooperate with law enforcement authorities, or as we deem appropriate to prevent physical harm or financial loss.

In the event that assets of Bask Bank, a division of Texas Capital Bank, are acquired by, sold to, or merged with another third party, we reserve the right to transfer your information in connection with this transaction.

## TRACKING

We collect data about your activities that does not personally or directly identify you when you visit our website, the website of entities for which we serve advertisements (our “Advertisers”), or the websites and online services where we display advertisements. This information may include the content you view, the date and time that you view this content, the products you purchase, or your location information associated with your IP address. We use the information we collect to serve you more relevant advertisements (referred to as “Remarketing”).

Additionally, we will track your use of our Site across multiple devices, monitoring your activity to personalize and improve your experience. All platform pixels, including those with our advertising networks, will be capturing anonymized user data including, without limitation: conversion activity, impression/click data, general media buy data, and unique identifiers, such as cookie IDs and Ad IDs (ad server only). We may share your personal information with non-affiliated companies that perform marketing programs on our behalf.

We also use Microsoft’s Universal Event Tracking (UET) feature which collects anonymized user data from advertising destination to provide Microsoft Advertising. Please review link for more information: <https://privacy.microsoft.com/en-us/privacystatement>

You can exercise your opt-out rights through the below resources:

- To opt out of Google’s use of cookies, you can visit Google’s Ads Settings: <https://www.google.com/settings/ads/plugin>
- To opt out of a third-party vendor’s use of cookies, visit the Network Advertising Initiative opt-out page (<http://www.networkadvertising.org/choices/>) or visit the Digital Advertising Alliance (DAA) opt-out page (<http://optout.aboutads.info/?c=2&lang=EN>)

Please note that not all tracking will stop, even if you delete cookies.



#### **DO NOT TRACK SIGNALS**

The site is not built to respond to “do not track” signals. Even if your browser is set to “Do Not Track,” our information collection and disclosure practices will continue to operate as described in this Policy.

#### **SOCIAL MEDIA**

We utilize social media platforms, such as Facebook, Twitter, and others, to foster online sharing and collaboration among our customers. Note that any content you make available through those platforms (such as name, pictures, or opinions) are subject to the terms of use and privacy policies of those platforms, not this Policy. To better understand your rights and obligations, please review the policies of the specific website or platform you are using.

Because we link to social media sites, and from time to time may include third-party advertisements, other parties may collect your personally identifiable information about your online activities over time and across different web sites when you visit this Site.

#### **HOW WE PROTECT YOUR INFORMATION**

We take the security of your personal information seriously. We actively work to limit access to your personal information to authorized employees, agents, contractors, or vendors. We also maintain physical, electronic, and procedural safeguards as required by law to protect the information we collect from you through our Site from unauthorized access, disclosure, manipulation, or destruction.

#### **CHILDREN’S PRIVACY**

Our site is not directed at individuals under the age of thirteen (13), and we do not knowingly solicit, collect, or use personal information from children under 13 without parental consent. Children under 13 are prohibited by this Online Privacy Policy from providing Personal Information through our Site. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

#### **KEEPING INFORMATION ACCURATE**

The accuracy of the information you provide to us is very important. Please log in to your account and update any account information you believe to be incorrect. If you cannot change or correct the information online, or you would rather make these changes offline, please contact us through the below channels:

- (1) Call the toll-free number 1-833-260-4320
- (2) Email Customer Support at [customersupport@baskbank.com](mailto:customersupport@baskbank.com)
- (3) Log in at [www.baskbank.com](http://www.baskbank.com) and send a secure message through the online portal

#### **ADDITIONAL RIGHTS**

Applicable laws may give you additional rights that are not described in this Online Privacy Policy.

#### **QUESTIONS**

For any questions regarding this Policy, please call us at 833-260-4320 or email us at [customersupport@baskbank.com](mailto:customersupport@baskbank.com).



**PRIVACY STATEMENT – CALIFORNIA**

**Effective 1/1/2020**

This privacy statement for California residents supplements the information contained in the Online Privacy Policy and applies solely for visitors, users and others who reside in the state of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the meaning when used in this notice.

**INFORMATION WE COLLECT/USE/DISCLOSE/SELL:** We collected the following information from consumers within the last twelve (12) months:

Personal Information Categories & Source	Business /Commercial Purpose (i.e. How we use it)	Sold or Disclosed to Third Parties (i.e. How we share it)
<p><b>Identifiers:</b>            Name            Postal Address            Email            Social Security Number            Driver’s License Number            AA Advantage Number            Username/Password            Other similar identifiers such as customer identification number that we generate</p> <p>We collect this information from you and governmental entities for purposes of opening an account and we may also collect information from data brokers.</p>	<p><b>Purpose:</b>            Security, Performing Services, Auditing</p> <p>Verify identity and information you provide to us when opening an account; provide services you requested;            Deliver servicing and marketing communications;            Provide customer support; Monitor account security and activities; comply with legal and regulatory requirements, perform internal reporting, surveys and analytics.</p>	<p>We share this information with our service providers to perform services on our behalf, business partners, and those whom you instruct us to share this information.</p> <p>We share this information only as necessary with governmental authorities and only as necessary to comply with legal or regulatory requirements.</p>
<p><b>Identifiers:</b>            IP Address            Unique Personal Identifier            Email</p>	<p><b>Purpose:</b>            Auditing Interactions with Consumers, Performing Services, Internal Research for Tech Development</p> <p>The information is used for engagement and marketing purposes. IP addresses also for more targeted and relevant marketing but can also support negative targeting (e.g., countries where we don’t want to market in)</p>	<p>We share this information with our service providers to perform services on our behalf and sell to third parties such as advertising networks, and those whom you instruct us to share this information.</p>
<p><b>Telephone number, bank account number:</b></p> <p>Bask Bank Account Numbers are generated by us.</p> <p>Telephone Number we collect from you. External Bank Account Numbers are collected from you if you link to</p>	<p><b>Purpose:</b>            Performing Services</p> <p>Verify identity and information you provide to us when opening an account; provide services you requested; service and marketing communications; Monitor account security and activities.</p>	<p>We share this information with our service providers to perform services on our behalf, business partners, and those whom you instruct us to share this information.</p>

your other bank accounts.		
<p><b>Personal characteristics:</b> Date of birth</p> <p>We collect this information from you when opening an account.</p>	<p><b>Purpose:</b> Security, Performing services</p> <p>Verify identity and information you provide to us when opening an account; provide services you requested.</p>	No
<p><b>Internet or other electronic network activity information:</b></p> <p><b>We track certain tags during interactions with:</b> Website, sign-up and online banking platforms, and Email interactions</p> <p><b>We also use platform pixels</b> from advertising networks.</p> <p>We collect this information when you engage with our website and mobile applications or interact with our digital ads.</p>	<p><b>Purpose:</b> Auditing Interactions with Consumers, Performing Services, Internal Research for Tech Development</p> <p>We review platform usage to identify opportunities for customer experience, re-marketing to consumers who have expressed interest in services and products, and to perform targeted marketing to consumers who fit profiles of interested prospects.</p>	We share with service providers and sell to third parties such as advertising networks.
<b>Commercial information</b>	We don't collect.	None.
<b>Biometric information:</b>	We don't collect.	None.
<p><b>Geolocation data:</b> During account opening, we ask whether you want to allow us to track your location.</p>	<p><b>Purpose:</b> Auditing Interactions with Consumers, Internal Research for Tech Development</p>	We share this information with our service providers.
<p><b>Audio, electronic, or similar information:</b></p> <p>We may collect from you.</p>	<p><b>Purpose:</b> Performing services</p> <p>We record audio for customer service purposes.</p>	We share this information with our service providers.
<p><b>Professional or employment-related information:</b></p> <p>We may collect this information from data brokers.</p>	<p><b>Purpose:</b> Performing Services; providing marketing to you about our products and services.</p>	We don't share.
<b>Education information:</b>	We don't collect.	None.
<p><b>Inferences drawn from any of the information identified:</b> We receive information through website tracking and your banking activity.</p>	<p><b>Purpose:</b> Security, Performing Services, Auditing Interactions with Consumers</p> <p>We may monitor banking activities and behaviors for security purposes and to better understand your needs and satisfaction with our services and improve our marketing programs and products.</p>	We share with our service providers and sell website tracking information with third parties such as our advertising networks.

Personal information does not include:

- Publicly available information from government records.



- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**YOUR RIGHTS, INCLUDING ACCESS, DELETION, AND OPT-OUT:**

You have the right to request that we disclose to you what information we collect, use, disclose, and sell. You also have the right to request that a business delete any personal information about you which the business has collected about you. To submit either of the above requests, you may contact us, by calling 1-833-260-4320, submitting via email at [customersupport@baskbank.com](mailto:customersupport@baskbank.com) or by sending a message through your password protected online account at <https://secure.baskbank.com/MyAccount/uux.aspx#/login>. Please note for your protection, any request sent to us relating to your personal information will be subject to the following verification procedure: (1) you may be verified by your submission made through your password protected online portal or by verifying identification points with client support. We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will endeavor to inform you of the denial, provide an explanation of our actions, and provide the reasons for the denial.

You have the right to direct us to not sell your information. To exercise this right to opt-out of the sale of personal information, you may call, email us as provided above or visit [baskbank.com](https://www.baskbank.com/) and click on the "Do Not Sell My Personal Information" link at the bottom of the homepage, at <https://www.baskbank.com/>. We shall not discriminate against you for exercising any of your above rights.

You may designate an authorized agent to make a request to exercise your rights on your behalf. Your authorized agent must be able to provide to us proof that you have authorized the agent to act on your behalf. For your protection, we reserve the right to deny any request from an agent who does not submit proof that they have been authorized to act on your behalf.

**Changes to Our Privacy Notice**

We reserve the right to amend this privacy statement at our discretion and at any time. When we make changes to this privacy statement, we will post an updated version on the website homepage. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.