

Online Privacy Statement

Last updated: January 24, 2020

Zions Bancorporation, N.A., and its affiliates (“Bank,” we, our, or us) respects your privacy, and is committed to protecting your personal information. This Online Privacy Statement (“Statement”) applies to www.ilmgmt.com, (the “Site”), and explains how we collect, use, and share your information.

PLEASE CAREFULLY READ THIS STATEMENT BEFORE USING THE SITE, AS IT AFFECTS YOUR LEGAL RIGHTS AND OBLIGATIONS. CONTINUING TO NAVIGATE THIS SITE CONSTITUTES YOUR AGREEMENT TO THE TERMS OF THIS STATEMENT.

The Bank controls this site. Software, hosting and other functions may be provided by our service providers (“Service Providers”) or business partners. This Statement does not apply to any of our other websites or offline activities (unless otherwise specifically stated) and you may also receive additional privacy notices from us if you are a customer or if you reside in a location that requires additional disclosures.

Information Collection on the Website

When you visit our Site, we collect information about you, including your IP address, browser choice, operating system, date and time of visit and the website you navigated from. This information helps us tailor your online experience to your device and to serve you information most relevant to you. Additionally, we also collect personal information that you provide to us if you use the Site to apply for or use our banking products or services, request additional information from us or participate in a promotion or survey. In such cases, if you so choose, you may give us your name, contact information, Social Security number, date of birth and email address.

Information Collection for Everyday Business Purposes

If you are a Bank customer or are applying to become one of our valued customers, we may collect personal information from you directly or through third parties. We do so to establish and maintain your accounts and otherwise to market and provide products and services to you. We may collect the following categories of personal information about our customers and potential customers:

- E-mail address
- Personal and business contact information
- Social security number and driver’s license number
- Birth date
- Marital status
- Transaction or loss history
- Credit history
- Credit scores
- Assets, liabilities, cash flow and net worth
- Investment experience
- Overdraft history
- Purchase history
- Financial risk tolerance
- Mortgage history
- Financial account information
- Employment information
- Wire transfer instructions

If you are a Bank insurance customer, we will also collect the following additional categories of personal data about you:

- Credit-based insurance scores
- Insurance claim history
- Litigation history

We may also collect “protected class” information (e.g., race, sex, gender national origin and age) from you in order to comply with relevant anti-discrimination laws, as well as certain biometric information for information security and fraud prevention purposes.

Bank customers can find additional information about how we collect and use your personal data at our customer privacy notice [here](#).

Cookies, Web Beacons and Other Embedded Technologies

Our Site uses cookies, web beacons, Adobe Flash and similar embedded technologies. A web beacon is a small string of code placed on a webpage to capture information such as IP address, time, web browser, time zone, and domain. Web beacons and cookies gather data that help us understand how you use our Site and to make your browsing experience more seamless. You may manage how and whether you allow certain embedded technologies by modifying your browser settings. Please see your web browser’s privacy policy for specific instructions regarding how to limit the use of these technologies on your computer. If you limit or delete embedded technologies, you may be unable to access or use all or part of the Site or benefit from information or services offered.

Online Promotions, Sweepstakes and Surveys

On occasion, you may have the opportunity to participate in online surveys or sweepstakes on our Site. Your participation in online surveys, sweepstakes or promotions is entirely voluntary. We use information gathered during these events to learn how to better serve you and to administer the promotions, sweepstakes and surveys.

Children’s Privacy

We feel strongly about protecting children’s privacy. As such, we do not knowingly collect personally identifiable information from children under 13 without parental consent. **THIS SITE IS NOT DIRECTED TO OR INTENDED FOR INDIVIDUALS UNDER 13 YEARS OF AGE.** If you are under the age of 13, please do not provide us personally identifiable information of any kind whatsoever.

Information Use and Sharing

Unless otherwise described in this Statement, we share information that we collect about you as described in the [Zions Bancorporation, N.A. Consumer Privacy Notice](#). We may share your information with Service Providers that perform services on our behalf. We provide our Service Providers with the minimum amount of information necessary to complete the requested service. Our Service Providers are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. We also may disclose your information (i) if we are required or permitted to do so by law or legal process, (ii) to law enforcement authorities, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. If some or all of our business is sold, merged with, or otherwise disposed of to one or more third parties (including in the event of bankruptcy) we may transfer your information to the subsequent organization or to a court, as allowed by law.

Advertising

We advertise our products and services on our Site and unaffiliated websites. To do so, we may use information about your relationship with us including the types of accounts you have, the state in which you bank and your purchase activity. These advertisements may be presented in the form of banner ads, splash ads (ads that appear as you sign on or sign off your online accounts) and other formats and may include prescreened offers of credit.

We also partner with advertising agencies to help us determine which advertisements are likely to interest you. Our advertising partners use cookies and other technologies to collect the following information:

- The number of people who look at each page on the Site
- Search engine referrals
- Browsing patterns
- Products and offers viewed
- In-ad browsing and searching
- Video content viewed
- Responses to advertisements and promotions

Third Party Links

We may reference links to other websites (including blogs, articles, products, services, news sites and other web sites) in our content controlled by third parties who are not affiliated with us (Third-Party Sites). These Third-Party Sites may not follow our same privacy, security, or accessibility standards. We are not associated with the Third-Party Sites referenced and are not responsible for, or endorse or guarantee, the content, web sites, products, services or operations of the Third-Party Sites or their affiliates. We are not responsible for how these Third-Party Sites collect information. We cannot guarantee how these Third-Party Sites use cookies, or if they place cookies on your computer that may identify you personally. We urge you to review the privacy policies of each of the linked websites you visit before providing them with any personally identifiable information. We do not guarantee and are not responsible for the privacy or security of third-party websites linking to our website, including the reliability, accuracy and completeness of the information they provide.

Social Media

We use social media platforms such as Facebook® and Twitter® to enable you to share and collaborate online. All content you post and make available on these social media platforms (including, without limitation, any personal information, pictures, or opinions) is subject to each social media provider's Terms of Use and Privacy Policies. To better understand your rights and obligations about such content, please refer to them.

Information Security

We restrict access to nonpublic personal information about you to those employees and Service Providers who need to know such information (e.g., to process your transactions or provide services to you). We and our Service Providers maintain physical, electronic, and procedural safeguards designed to protect against loss or unauthorized access, disclosure, alteration or destruction of the information you provide on our Site.

Maintaining Accurate Information

We endeavor to maintain the accuracy of personally identifiable information we collect. Please contact your branch, account representative or call our customer service center at (800) 608-3202, if you believe that our information about you is incomplete, out-of-date, or incorrect. You may also log in to your account online to update your email address. To update/change your email address within online banking, follow these steps:

- Log in to your online banking account
- Hover over Preferences in the upper tool bar
- Click on Address/Email Preferences
- Click on Change Email Enter your preferred email address and click Submit
- A confirmation code will be sent to the new email address you entered. Retrieve the code, enter it as indicated and click Submit

California Residents

We do not share California resident personal information with affiliates or third parties for the affiliates' or third parties' direct marketing purposes.

California residents also have specific privacy rights provided by the California Consumer Privacy Act, as it may be amended from time to time. These include: (1) the right to request information from us regarding what categories of personal data we have collected about you; (2) the right to request a copy of the specific personal information collected about you during the last 12 months; (3) a limited right to have such information deleted (with exceptions); (4) the right to request that your personal information not be sold to third parties, if applicable; and (5) the right not to be discriminated against because you exercise your rights. To exercise these rights or to inquire about privacy protection at the Bank, you may visit <https://datarights.zionsbancorp.com> or contact us by phone at (855) 210-9448. Click [here](#) to notify the Bank that you do not want us to sell your personal information.

Notice to Persons Accessing this Site Outside the United States

If you are accessing our website from a location outside of the United States, all information you provide on our Site will be transferred out of your resident country into the United States. Do not provide information to us if you do not want your personally identifiable information to leave your country. By providing personally identifiable information to us, you are explicitly consenting to the transfer of your information to the United States and will be bound by United States law, this Statement, and our Consumer Privacy Notice, available at www.ilmgmt.com.

Changes to this Notice

We may add to, delete, or change the terms of this Online Privacy Statement from time to time by posting a notice of the change (or an amended Online Privacy Statement) at this website. Your continued use of our website or any online service following notification will constitute your agreement to the revised Online Privacy Statement.

Questions

If you have any questions regarding this Online Privacy Statement, you can call us at (800) 608-3202.