

GATE CITY BANK DIGITAL PRIVACY POLICY

Last Updated: May 20, 2021

Your privacy is important to us. This Privacy Policy is meant to help you understand the information we collect, why we collect it, and how you can manage it. This Policy applies to our website at <https://www.gatecity.bank> (the "Site"), our mobile Apps, and all Gate City Bank products, services, and communications (the "Services"). By using our Site, or by purchasing our products or services, you are acknowledging that you have read, understood, and accept this Privacy Policy.

In this Privacy Policy, any use of the words "you", "yours," or similar expressions refers to users of this Site and our Services, as well as any other individuals whose information we collect and process. References to "we", "us", "our" or similar expressions refer to Gate City Bank.

This Policy does not extend to anyone whose personal information is not under our control or management, including data that is collected by other websites that you may visit before or after this Site, and which are not governed by this Privacy Policy. We are not responsible for the data protection or privacy policies of any other websites, and accept no responsibility or liability for those policies. Please carefully check the policies of other websites and services you use before you visit or submit personal information.

As you review this Digital Privacy Policy, here are general principles to keep in mind:

- If you have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with our Privacy Notice, which offers you certain choices with respect to the use and sharing of your personal information.
- Our online services are not intended for children under 13. We do not knowingly collect personal information from children under 13 without parental consent. For details about our handling of children's personal information in connection with Gate City Bank, please review our Protecting Your Children portion.

Information We Collect

Information We Collect and Receive

In order for us to be able to provide our Services to you, we need to collect and process certain types of information about you. Depending on your use of our Site and Services, this may include:

- Information you provide to us by completing applications or forms, whether in person or on our website: For example, if you apply for credit or a loan online at <https://www.gatecity.bank/apply/>, we may collect the information you provide to us through the application form. The information we collect may include your name, address, telephone number, Social Security Number, date of birth, income, debts, email address, account history information, employment history and other credit qualification information. We keep this collected information from both completed and partially completed applications;
- Information you provide to us by contacting us: Any personal information you may provide to us when you email or call us, such as name, phone number, employer, and any other details you provide in your communications, or online at contact us through our Contact Us page at <https://www.gatecity.bank/about-us/contact/>. Gate City Bank may also request your contact information for the purposes of having someone contact you for additional information, or in response to your request for information from us;
- Online Banking Information: If you do bank online with us, you are required to create an online banking profile by supplying a username, password, email address, and answers to a few security questions. Once you have created your online banking profile, we also collect and retain certain Personal Information including:
 - Your name, postal address, email address, mobile number and other contact information
 - Your account number(s) and certain transaction information
 - Your date of birth and Social Security Number or individual Taxpayer Identification Number
 - Information necessary for you to transfer funds from your Gate City Bank accounts to your accounts at other financial institutions or pay your bills online;
- Information about you from certain third parties, such as credit reporting agencies when you requests quotes about our Services;
- Information about the ways people visit and interact with our Site and mobile App, such as traffic analytics, geolocation information, preference information, and other statistics. You must opt in to sharing your geolocation information before we will collect it, and the decision to share your location is entirely up to you. We use this information to offer location-specific services, like helping you find our ATMs and our branches. While our Apps do not automatically collect location information from your device. However, our Apps use, but do not store, certain location-based data from your mobile device to help you find our branches or our ATMs. If you do not wish to use these location features, you should review your mobile device's settings and disable location services; and

- Information about your activity on our Sites, including your device information (such as your IP address, the type of device or browser you use, and your actions on the website).

We will only use personal information to provide you with information, products, or services you have requested, or for other purposes set out in this Policy. Personal information does not include aggregate information from which individual identities have been removed.

Protecting Your Children.

Our website is not targeted or marketed to children under the age of thirteen. We respect the privacy of your children, and we comply with the practices established under the Children's Online Privacy Protection Act. We do not knowingly collect or retain personally identifiable information from consumers under the age of thirteen. If you believe we have collected identifiable information directly from a website (child) user less than 13 years who was using this website please contact us and we will take appropriate measures.

Cookies and Tracers

We use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across the Site and different Services and devices. Cookies are pieces of information stored directly on your device. Cookies provide information that is used for security purposes, to facilitate navigation, to display information more effectively and to personalize/customize your online experience. You can control cookies through your browser settings and other tools. This website does not respond to Do Not Track signals.

You can also opt-out from our use of cookies and similar technologies that track your behavior on the sites of others for third party advertising. If you do not wish to participate in history/behavioral tracking to provide tailored content and advertising you may opt-out by visiting:

- [Google's Ads Settings](#)
- [DoubleClick](#)
- [NAI opt-out](#)

How We Use Information

Gate City Bank may use the personal information we collect for the following purposes:

- To deliver our Services and related customer support;
- To process any financial transactions you make with us.
- To keep your information secure, and to be able to verify your identity and contact information;

- To help us analyze our Site and enhance your overall experience, such as to alert you of any possible software compatibility issues as well as helping us to make decisions about how various technologies are used.
- To alert you about product and service updates, special offers, updated information and other news and services from Gate City Bank;
- To comply with the law and protect our rights, and the rights of others;
- To ensure our website and services are relevant to you and your interests; and
- To contact you in response to sign up forms or requests such as when you request an price quote.

How Information May Be Shared

Gate City Bank will never sell or rent any of your personal information, and we will never share your non-public personal information except as permitted by law. However, we may share your information with certain trusted affiliates or third-party services to help us provide, improve, promote, or protect our products and services. For example, we may partner with other companies to process your payments or store your data to support delivery of our products or services. We may also share relevant non-public personal information whenever you request an insurance quote as necessary to provide the requested quote. Whenever we share data with third-party services or affiliates, we require that they use your information only for the purposes we've authorized, and that they protect your personal information.

We also reserve the right to disclose personal information when it is reasonably necessary to conduct our business, in the event of a merger or sale of our business, to protect Gate City Bank's legal rights and property, and to comply with the law or law enforcement.

Protection of your Personal Information

We take the security of your personal information seriously, and follow industry-standard practices to protect the data we collect and process. Gate City Bank has put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and secure the personal information that Gate City Bank receives and collects. We also restrict access to information about you to those employees and agents who have a need to know that information in order to provide our Services to you.

Remember, the safety and security of your information also depends on you. No method of transmission over the internet or electronic storage is completely secure, so Gate City Bank cannot guarantee its absolute security. We are not liable or responsible for the criminal actions of unrelated third parties.

Email Notifications

We try to keep email communications to a minimum, and give you the ability to choose to receive marketing communications we may send. For example, we may send you email relating to our Services and related offers. You may also choose to receive certain marketing email

communications, from which you may opt out at any time. You can always opt out of receiving email from Gate City Bank by clicking the unsubscribe link contained in all our emails, or by contacting us at <https://www.gatecity.bank/about-us/contact/>. This opt out does not apply to information provided to Gate City Bank as a result of transactions that you specifically request.

Retention

We will hold your personal information on our systems for as long as is necessary to perform the relevant processing activity for that information, or as long as is set out in any relevant contract you hold with us. This is a case by case determination that depends on things like the nature of the data, why it was collected, why it is processed, and any relevant legal or operational retention needs. For example, we may be legally required to hold some types of information to fulfil our statutory obligations. We review our retention periods for personal information on a regular basis.

California Residents

Users or Site visitors residing in California are afforded certain rights regarding their personal information that is not otherwise regulated by other state and federal financial privacy laws. Except where an exception or exemption applies, these rights may include 1) the right to request a copy of the information we have collected about you during the previous twelve months, as well as the right to review our data collection practices related to you, (a “Personal Information Request”); 2) the ability to request deletion of your personal information; 3) and the right not to be discriminated against due to your exercise of any of the preceding rights. To ensure that your personal information is accurate and complete, please contact us through the email address below regarding any errors or updates affecting the personal information that we may hold.

You may also send us an email below, or call us to request access to, correct, or delete any personal information that we hold about you. To protect your privacy and security, Gate City Bank may take reasonable steps to verify your identity before granting access to, correcting, or deleting data. We will generally respond to your request for information within 45 days, unless, for reasons beyond our control, a longer response time is necessary, in which case, you will be advised accordingly. Please note that we may retain certain information as required by law or as necessary for our legitimate business purposes.

Questions or Comments

If you have questions or comments about this Privacy Policy, or if you are not satisfied with this Privacy Policy or its application, we invite you to convey your concerns or suggestions to us at <https://www.gatecity.bank/about-us/contact/>. We will reply as quickly as possible and inform you of the steps, if any, that have been or will be taken in order to address your concern or implement the suggestion.

Updates and Changes to this Privacy Policy

This Privacy Policy is effective from May 2021. We may update this Policy from time to time. If we do, we'll let you know about any material changes, either by notifying you here on the Site or by sending you an email. If you keep using our Site or Services after a change, that means you accept this Privacy Policy.

General Privacy Statement

This General Privacy Statement applies to information collected by Gate City Bank Agency generally, including but not limited to information collected through the website.