



## Headquarters

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## ONLINE PRIVACY POLICY

Your privacy is important to us. This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use online services of the Bank of Guam (“us”, “we”, and “our”) that link to or reference this policy (collectively, our “online services”). This policy covers the Bank of Guam’s many online services, including the Bank of Guam websites, Bank of Guam Online and Mobile Banking, and Bank of Guam-branded social media sites or pages, as well as any interactions you may have while viewing content provided through one of Bank of Guam’s digital advertising campaigns.

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

Our online services are intended for a U.S. audience. If you visit or use one of our online services, your information may be transferred or processed in the United States. For non-U.S. online services, please review the privacy policy applicable to that service to understand how your information will be treated and safeguarded.

Our online services are not intended for children under 13. We do not knowingly collect personal information from children under 13 without parental consent.

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 U.S. Consumer Privacy Notice, <https://bankofguam.com/privacy-security> which offers you certain choices with respect to the use and sharing of your personal information.

If you are a California resident, you may have rights under the California Consumer Privacy Act, <https://bankofguam.com/privacy-security>.

Bank of Guam Online and Mobile Banking and our social media sites or pages may have additional terms from this policy about the privacy of your information. Please review the privacy policy for the specific online service you are using.

## INFORMATION WE COLLECT

### Personal Information

When you visit or use our online services, we may collect personal information from or about you such as your name, email address, mailing address, telephone number(s), account numbers, limited location information (for example, a zip code to help you find a nearby ATM), user name and password. We may also collect payment card information, social security numbers, driver’s license numbers (or comparable) when you provide such information while using our online services and where we believe it is reasonably required for ordinary business purposes.

### Usage and Other Information

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, the type of operating system and browser you use, and information about the site you came from, the parts of our online service you access, and the site you visit next. We or our third-party partners may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you.

### Bank of Guam Online and Mobile Banking

For your convenience, Bank of Guam offers you the ability to access some of our products and services through mobile applications and mobile-optimized websites (“Bank of Guam Online and Mobile Banking”). When you interact with us through Bank of Guam Online and Mobile Banking, we may collect information such as unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device. We may ask your permission before collecting certain information (such as precise geo-location information) through Bank of Guam Online and Mobile Banking.

### Additional Sources of Information

We may also collect information about you from additional online and offline sources including from co-branded partner sites or commercially available third-party sources, such as credit reporting agencies. We may combine this information with the personal and other information we have collected about you under this Online Privacy Policy.

## USE OF INFORMATION

We use the information discussed above in a number of ways, such as:

Processing applications and transactions;

Verifying your identity (such as when you access your account information);

Preventing fraud and enhancing the security of your account or our online services;

Responding to your requests and communicating with you;

Managing your preferences;

Performing analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view;

Providing you tailored content and marketing messages;

Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions);

Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies; and

For any other purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

## DISCLOSURE OF INFORMATION

We may share the information we collect from and about you with our affiliates and other third parties. For example, we may share your information with:

Bank of Guam third-party service providers;

Bank of Guam affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations;

Other companies to bring you co-branded services, products or programs;

Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of Bank of Guam businesses; and

Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our U.S. Consumer Privacy Notice.

We may share anonymous or aggregated information with third parties to help deliver products, services, and content that are better tailored to the users of our online services and for other purposes.

## UNDERSTANDING COOKIES, WEB BEACONS AND OTHER TRACKING TECHNOLOGIES

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

"Cookies" are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.

## **ONLINE ADVERTISING**

You will see advertisements when you use many of our online services. These advertisements may be for our own products or services (including pre-screened offers of credit). Which advertisements you see is often determined using the information we have about you, including information about your relationships with us (e.g., types of accounts held, transactional information, and location of banking activity). To that end, where permitted by applicable law, we may share with others the information we collect from and about you.

## **LINKING TO THIRD-PARTY WEBSITES**

Bank of Guam may provide links to websites that are owned or operated by other companies ("third party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

## **SECURITY**

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

## **UPDATING YOUR INFORMATION**

Keeping your account information up-to-date is very important. You may review, or update certain account information by logging in and accessing the "Change of Information section under "Settings". If you cannot change the incorrect information online, or you prefer to request changes offline, please use the "Contact Us" or "Live Chat" option on our site, or call or write to us using the contact information listed on your account statements, records, or other account materials. You can also speak to one of our branch representatives, your relationship banking manager, or business development officer.

## **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.