

Florida Capital Bank Online Privacy Notice**Last Updated: May 2019**

Your privacy is important to us. This Online Privacy Notice explains how we collect, share, use, and protect information when you visit or use this online service and any other online services offered by Florida Capital Bank, N.A. (referred to in this Online Privacy Notice as “FLCBank”, “FLCB”, we, our, or us). This Online Privacy Notice applies to FLCBank’s many online services, including FLCBank websites, applications, FLCB Mobile apps, and FLCBank branded social media sites or pages, as well as any interactions you may have while viewing content provided through one of FLCBank’s digital advertising campaigns (collectively, the “Site”).

The Site is owned and operated by Florida Capital Bank, N.A., although software, hosting and other functions and content may be provided by third-party service providers ("Service Providers") or other companies affiliated with FLCBank or merely in a business relationship with FLCBank.

As you review this Online Privacy Notice, 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.
- Our online services are not intended for children under 13. We do not knowingly collect personal information from children under 13 without parental consent.
- In addition to this Statement you may receive and be covered by the FLCBank’s [U.S. Consumer Privacy Policy Notice](#), as well as other privacy disclosures that we provide to you with account opening documents.
- FLCB Mobile 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.
- If you have questions after reviewing this notice, please email Consumer Inquiries at CustomerInquiry@flcb.com. *(This email is for Consumers only and any use for soliciting services will be reported to applicable regulatory authorities for abuse).*

Information Collected

When you visit our Site or use our online services, we may collect personal information from or about you, including, but not limited to, your name, email address, mailing address, phone number(s), account numbers, location information, user name and password. We may also collect payment card information, social security number, date of birth, driver’s license numbers when you provide such information while using our online services and where we believe it is reasonably required for ordinary business purposes. We may gather such information, for example, when you use the Site to apply for and/or use our banking products and services or participate in our events or promotions (including, without limitation, webinars and online surveys).

In addition to the above information, when you visit our Site or use our online services, we may collect 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.

Collecting this personal information enables us to offer you online experiences and products that we believe may help you with your financial needs. We use this information to better tailor and personalize our service and marketing communications with you, both online and offline. We may also use your personal information for our business purposes (for example, to develop new products, improve the Site, and analyze data collected through the Site), as well as for risk management and for legal compliance purposes.

FLC Bank Mobile

For your convenience, FLC Bank offers you the ability to access some of our products and services through mobile applications and mobile-optimized websites (“FLC Bank Mobile”). When you interact with us through our mobile app, 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.

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 (clear GIFs), 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 and collect online/mobile activity data from you depending on your browser settings.

- “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. Please note: If you choose not to accept cookies from our Site, you may not be able to access all or part of the Site, or benefit from the information and online services offered.
- Web beacons, clear GIFs, or pixel tags, 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, understand how customers use our Site and measure Site or campaign engagement.
- Local shared objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local shared objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way.

Information Use and Sharing

Unless otherwise described in this Statement, we will use and share information that we collect through the Site in accordance with the Florida Capital Bank, N.A. [U.S. Consumer Privacy Notice](#). We will only provide third parties with the minimum amount of information necessary to complete the requested service.

When you provide information to us through our Site, we may share your information with other third parties we have retained to perform services on our behalf. These third-party 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.

We reserve the right to transfer any information we have about you in the event that all or part of our assets are acquired by, merged with, sold to, or otherwise disposed of to one or more third parties.

Third-Party Website Links

FLCBank may provide or reference links in our content to other websites (including blogs, articles, products, services, news sites and other web sites) that are owned or operated by third parties (Third-Party Sites) who are not affiliated with us. When you use a link online to visit these Third-Party Sites, you will be subject to that website's privacy and security practices, which 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 familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing them with any personally identifiable information.

In addition to our Site referencing third party links, periodically, Third-Party Sites may have products, services or operate sites linking to us. We do not guarantee and are not responsible for the privacy or security of Third-Party Sites linking to our website, including the reliability, accuracy and completeness of the information they provide.

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 not required. You do not have to complete online surveys, sweepstakes or promotions; however, online surveys are used to gather information to better serve you. Using the information, you provide to us, allows us to inform you of our accounts and services

Information Security

We have policies restricting access to nonpublic personal information about you to those employees and Third-party service providers who have a need to know such information (e.g., to process your transactions or provide services to you). We and ensure our Third-party service providers have implemented and 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.

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.

Maintain accurate account information

Keeping your account information up-to-date is very important in protecting yourself against fraud and helping us when we need to use identifiable information to verify account information. If you need to update your information or if you believe that our information about you is incomplete, out-of-date, or incorrect, you may review or update certain account information by logging into your account online. If you cannot change the incorrect information online, or you prefer to request changes offline, please contact your branch or Business Relationship Banker, or call our customer service center at 1-800-318-3159, and they will be able to help you

Social Media

To enable online sharing and collaboration among our customers and community members, we use social media platforms. All content you post and make available on these social media platforms (including, without limitation, any personal information, pictures, or opinions) is subject to the Terms of Use and Privacy Policies of those platforms. To better understand your rights and obligations with regard to such content, please refer to them.

Protecting Children's Privacy Online

The Site is not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide Personal Information through the Site. The Bank does not knowingly collect, use, or disclose personal information from or to children under age 13 without obtaining written, verifiable consent from a parent or legal guardian. Our Site is directed to a general audience, and it may be accessed by the public.

The Children's Online Privacy Protection Act ("COPPA") protects children under the age 13 from the online collection of personal information. For more information about COPPA, visit the Federal Trade Commission website: <http://www.ftc.gov/opa/reporter/privacy/coppa.shtml>

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 [U.S. Consumer Privacy Notice](#).

Changes to this Online Privacy Notice

We may add to, delete, or change this Online Privacy Notice from time to time. When we do, we will post the revised notice on our website www.floridacapitalbank.com with a new "Last Updated" date at the top of the document. Any changes to this Online Privacy Notice will become effective when posted unless indicated otherwise. Your continued use of our Site or any online service will constitute your agreement to the revised Online Privacy Statement.

Questions

If you have questions after reviewing this notice, please email Consumer Inquiries at CustomerInquiry@flcb.com. *(This email is for Consumers only and any use for soliciting services will be reported to applicable regulatory authorities for abuse).*