

January 1, 2024

Zions Bancorporation, N.A., and its affiliates (“Bank,” we, our, or us) respects your privacy, and is committed to protecting your personal information. This Digital Privacy Statement (“Statement”) explains how we collect, use, and disclose your information. It applies to any online or mobile site or application that we own and control (“Site”), unless a different online and/or mobile or other privacy statement is posted relating to a particular site, application, product, or service, or is made available to you and by its terms supplants this Statement. Software, hosting, and other functions may be provided by our service providers (“Service Providers”) or business partners.

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.

Information Collection on the Website

When you visit our Site, the types of personal information we obtain about you depends on how you interact with us and our products and services. 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. We may also use some of this information for third-party online behavioral advertising.

Monitoring and Providing Digital Chat

Your session on the Site will be recorded and monitored to collect data and manage any digital chats you may have with a bank employee. To do this, we may utilize screen sharing technology, which can allow us to help you navigate through the site and find information in real time, making it easier for you and others to interact with the Site and the bank.

Categories of Personal Information that We Collect & Why We Collect It

We collect Personal Information to provide individual and commercial financial products and services as well as for our employment and human resource purposes. “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

We have collected or may collect the following categories of Personal Information about you. The specific pieces of Personal Information we collected about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

Category	Example	Purpose for Collection
Personal Identifiers	Full name, alias, date of birth, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, and state identification number	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Personal Records (As defined in Cal.	Signature, physical characteristics or description, address, telephone number, insurance policy number, education, employment, employment history, bank account number, credit or debit card number, other financial information, medical information, health insurance information	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance

Digital Privacy Statement

January 1, 2024

Civ. Code §1798.80(e))		<ul style="list-style-type: none"> ▪ Security/Fraud ▪ To comply with our legal obligations
Characteristics of Protected Classes	Characteristics of protected classes or groups under state or federal law, such as sex or marital status	<ul style="list-style-type: none"> ▪ Performing services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Purchase Information	Including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Biometric Information	Biometric information, such as fingerprints and voiceprints	<ul style="list-style-type: none"> ▪ Performing services ▪ Security/Fraud
Internet or Online Information	Information regarding interactions with our website, mobile applications, emails computer systems, devices, or advertisements, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers, including browsing or search history	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ Debugging ▪ To comply with our legal obligations
Geolocation Data	Geolocation data (ex: device location, your IP address when visiting our website or your physical location when using a Bank ATM (Automatic Teller Machine))	<ul style="list-style-type: none"> ▪ Performing services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ Debugging ▪ To comply with our legal obligations
Audio and Visual Information	Audio, electronic, visual, or olfactory information (ex: voice recordings when you contact a call center)	<ul style="list-style-type: none"> ▪ Performing services ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Employment Information	Work history and prior employer information	<ul style="list-style-type: none"> ▪ Performing Services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Education Information	Information about institutions attended or degrees conferred	<ul style="list-style-type: none"> ▪ Performing services
Inferences	Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics	<ul style="list-style-type: none"> ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud

Digital Privacy Statement

January 1, 2024

Sensitive Personal Information	Social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; racial or ethnic origin	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Digital Communication Engagement	Your session on this site will be monitored to collect data and manage our digital chat.	<ul style="list-style-type: none"> ▪ Help you interact with the site and the bank

Category of Information that Third-party Payment Processor may Collect

Online Banking users may opt to use an affiliated Third-party Payment Processor via the Banks Online Banking platform to facilitate payments to individuals and/or businesses.

Contact List Access	User may agree to contact list access from a 3rd party by clicking agree/submit button	<ul style="list-style-type: none"> ▪ To facilitate a desired transaction or validate payee is capable of receiving payment.
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Sources of Personal Information

We may collect your Personal Information directly from you when you provide us information online, through electronic forms, over the phone, or through paper documents; automatically through our website via cookies and other tracking technologies; from our service providers, vendors and suppliers, affiliates, or other individuals and businesses; from third-party sources, such as data providers; and from public sources of data, such as government databases.

Disclosures of Personal Information

We disclose Personal Information to our Service Providers for the business purposes listed in the chart above. The categories of Personal Information we disclose for a business purpose are:

1. Personal Identifiers
2. Personal Records (As defined in Cal. Civ. Code §1798.80(e))
3. Characteristics of Protected Classes
4. Purchase Information
5. Biometric Information
6. Internet or Online Information
7. Geolocation Data
8. Audio and Visual Information
9. Employment Information
10. Education Information
11. Inferences
12. Sensitive Personal Information

Categories of personal information disclosed that may be considered “sale” or “sharing” under California law: Basic Identifying Information, Device Information and Other Unique Identifiers, Internet or Other Network Activity, Geolocation Data, and Commercial Data.

Categories of third parties to whom personal information was disclosed that may be considered “sale” or “sharing” under

January 1, 2024

California law: advertisers and marketing partners, data analytics providers, and social media networks.

We do not sell Personal Information for money. However, our use of tracking technologies may be considered a “sale” or “sharing” under California law. We may share the following categories of Personal Information with advertising or analytics providers, including for cross-context behavioral advertising:

1. Personal Identifiers
2. Personal Records (As defined in Cal. Civ. Code §1798.80(e))
3. Purchase Information
4. Internet or Online Information
5. Geolocation Data
6. Inferences

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

Information Use and Disclosures

Unless otherwise described in this Statement, we disclose information that we collect about you as described in the Bank’s [Consumer Privacy Notice](#). We may disclose your information to 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.

Cookies, Web Beacons, and Other Embedded Technologies

We and our third-party service providers (such as advertising and analytics providers) use cookies, web beacons, clear GIF, pixels, internet tags, and other similar tracking technologies (collectively, “tracking technologies”) to gather information when you interact with our websites, Mobile Apps, and email communications. Some tracking technologies help us maintain the security of our websites and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions. These tracking technologies are “required” because we need them for the websites to work properly. We permit third parties to use tracking technologies on our websites and Mobile Apps for analytics to understand how visitors interact with our websites and Mobile Apps.

We also permit third parties to use tracking technologies on our websites and Mobile Apps for advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties use their technology to provide advertising about products and services tailored to your interests which may appear either on our websites or on other websites. This is sometimes referred to as third-party online behavioral advertising.

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

January 1, 2024

We feel strongly about protecting children's privacy. As such, we do not knowingly collect or sell 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. The Bank does not have any actual knowledge that it sells or shares the personal information of consumers under 16 years of age.

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.

SMS

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. This includes affiliate or business partners. The SMS Opt-In is not transferable to another party involved in the process.

Information Security

January 1, 2024

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.

The Right to Correct Inaccurate Personal Information

We endeavor to maintain the accuracy of the personal information we collect. Please contact your branch, account representative, or call our customer service center at (877) 397-5463, if you believe that our information about you is incomplete, out-of-date, or inaccurate. 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

California residents have privacy rights provided by the California Consumer Privacy Act (CCPA), as it may be amended from time to time. These include:

1. Right to Know What Personal Information is Being Collected about you, including the sources from which the personal information is collected, sold or shared; the business or commercial purpose for collection and disclosure of personal information; and the third parties to whom we disclose, sell, or share personal information;
2. Right to Access Personal Information We Collect about you in a machine-readable format if available;
3. Right to Delete Personal Information, subject to certain exceptions;
4. Right to Opt-Out of Sales or Sharing of Personal Information, if applicable;
5. Right Not to Receive Discriminatory Treatment for the Exercise of Privacy Rights;
6. Right to Correct Inaccurate Personal Information.

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 or share your personal information or to exercise any of your other rights. Please note that we may require additional information from you to verify your identity and process your request. You can also submit a request via an authorized agent using the contact methods described above. If you use an authorized agent, we may request a copy of the agent's signed permission to act, verify your identity directly, and ask that you confirm the agent's authority. The authorized agent will need to enter the required data, when prompted, after accessing the Data Rights link provided above.

CCPA requests are handled either online or by phone. Completed requests will then be processed and systems will be searched based on the information provided. Results will then be communicated either through email or direct mail. We will acknowledge your request within 10 days.

More details concerning CCPA can be found in our [California Personal Information Point of Collection Notice](#).

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

Digital Privacy Statement

January 1, 2024

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](#).

Changes to this Notice

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

Questions

If you have any questions regarding this Digital Privacy Statement, you can call us at (877) 397-5463.