

Online Privacy Notice

Effective Date April 1st 2015

This Online Privacy Notice (the “Notice”) describes how information is collected by and through websites, mobile applications, and online interfaces that are owned, operated, or controlled by Regions Financial Corporation or its affiliated companies (collectively, the “Sites”), including this Site, and how that information may be used and shared. The terms and disclosures in this Notice do not apply to non-consumer use of any Site and do not apply to any information describing, identifying, or relating to parties who or which are not natural persons who use a Site for consumer purposes (“Non-Consumer Users”). We may collect by or through our Sites, and use, disclose, and share, information describing, identifying, or relating to Non-Consumer Users for any purpose, subject to the requirements and restrictions of applicable law.

For purposes of this Notice, the terms “we”, “us”, and “our” refer to the applicable Regions company that owns, operates, or controls the Site that you use, and such terms may also refer to contractors and service providers engaged by Regions companies to support their business activities, as the context may require. The terms “you”, “your” and “yours” refer to any natural person who accesses or uses a Site for personal, family, or household purposes. By using or accessing any Site, you confirm your agreement to the terms of this Notice as may be in effect at that time.

This Notice supplements, but does not replace, the general Website Terms of Use (https://www.regionscustomercommunity.com/MediaServer/5/documents/Website_Terms_of_Use.pdf) for the use of this Site. In the event of a conflict between the terms of this Notice and the terms of the general Website Terms of Use, the terms of this Notice will govern and control with respect to the matters addressed in this Notice. Certain Sites may have separate privacy notices or terms and conditions that are specific to those Sites, and when you use or access those Sites those separate privacy notices or terms and conditions will apply and will control in the event of a conflict with the terms of this Notice. This Notice also supplements, but does not replace, and should be read in conjunction with the Regions Privacy Pledge to Consumers (http://www.regions.com/about_regions/privacy_pledge.rf). To the extent that any information at issue is “nonpublic personal information” as defined by Title V of the Gramm-Leach-Bliley Act (Public Law No. 106-102) and applicable related regulations, the Regions Privacy Pledge to Consumers will apply and control in the event of a conflict with the terms of this Notice.

Categories of Information We Collect through Our Sites – Personally Identifiable Information and Anonymous Information

We may collect and use both Personally Identifiable Information and Anonymous Information by and through our Sites. For purposes of this Notice, “Personally Identifiable Information” means

any information or combination of information that we collect or use by or through a Site that identifies you personally, and “Anonymous Information” means information that we collect or use by or through a Site that does not identify you personally or contain personal identifiers about you. Personally Identifiable Information may include, for example, your name, your home address, your email address, your telephone number, your social security number, your account number, or transaction information. Anonymous Information may include, for example, information about your device or internet browser, information obtained from cookies that have been placed on your device or internet browser at our Site or at other websites you have visited, demographic information, aggregated information, blind information about how you use our products and services and about the transactions you perform using our products and services, and other information obtained through your access to or use of a Site that does not identify you personally. We may supplement the information we collect from you with information we receive about you from other sources.

How We Collect, Use, and Share Personally Identifiable Information

We collect Personally Identifiable Information when you use our Sites to apply for, obtain, or use our products and services, or to make inquiries about our products and services, or to provide information and feedback about our products and services. In connection with your use of our Sites, products, and services, we may ask for, and you may provide, Personally Identifiable Information in forms, surveys, applications, and online fields, or you may authorize us to collect Personally Identifiable Information from third party sources. Personally Identifiable Information also may result from transactions and inquiries you make using our Sites. We may use Personally Identifiable Information:

- To respond to your inquiries and requests, and to send you notifications.
- To send administrative information to you, such as information regarding the Site and changes to our terms, conditions and policies.
- To complete and fulfill your applications for our products and services and to deliver and perform such products and services, to execute inquiries and transactions you have requested, to communicate with you regarding products and services you have obtained from us, and to provide you with related customer service.
- To verify your identity or location for security purposes.
- To send you marketing communications that we believe may be of interest to you.
- To personalize your experience on the Site by presenting products and offers tailored to you.
- As you agree, authorize, or consent in agreements, terms, and conditions you agree to or accept in connection with products and services you obtain from us.
- For our business purposes, including (but not limited to) such purposes as (i) data analysis, (ii) audits, (iii) fraud monitoring and prevention, (iv) new product development, (v)

enhancing, improving or modifying our products and services, (vi) identifying usage trends, (vii) determining the effectiveness of our promotional campaigns, and (viii) operating and expanding our business activities.

- As we believe to be necessary or appropriate (i) under applicable law, (ii) to comply with legal process and otherwise to comply with applicable laws, rules, and regulations, (iii) to respond to lawful requests from public and government authorities, (iv) to enforce our terms and conditions, (v) to protect our operations or those of any of our affiliates, (vi) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

For additional information about how we collect, use, share, and protect personal information about our consumer customers, and for information about the choices you may have, please review the [Regions Privacy Pledge to Consumers](http://www.regions.com/about_regions/privacy_pledge.rf) (http://www.regions.com/about_regions/privacy_pledge.rf).

Updating Personally Identifiable Information

Online applications you use at our Site in connection with our products and services generally will enable you to review, update and correct certain Personally Identifiable Information about you. You may also contact your local banker or account officer, or call us at 1-800-REGIONS (1-800-734-4667), for information about how to review and update certain information about you in our records.

How We Collect, Use, and Share Anonymous Information

We may collect Anonymous Information:

- Through or from your device or browser or cookies that have been placed on your browser. Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version and Internet browser type and version. We use this information to ensure that the Site functions properly and to maintain security.
- Using pixel tags and similar technologies. Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Site pages and HTML-formatted email messages in order to, among other functions, track the actions of users and email recipients, measure the success of our marketing campaigns and compile statistics about Site use and response rates.
- Using your IP address. Your IP address is a number that is automatically assigned by your Internet Service Provider to the computer or device that you are using. An IP address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the pages that were visited. We use IP addresses for

purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.

- From you. Information, such as your preferred means of communication, is collected when you voluntarily provide it. Unless combined with Personally Identifiable Information, this information does not identify you personally.
- Using geolocation and other location information transmitted by your device, if you have enabled location services on the device.
- By aggregating information. When we aggregate Personally Identifiable Information about numerous users of our Site, the information does not personally identify you or any other user of the Site (for example, we may aggregate Personally Identifiable Information to calculate the percentage of our users who have a particular telephone area code).

We may use, disclose, and share Anonymous Information as described in this Notice and/or for any other purpose, subject to the requirements and restrictions of applicable law. If we combine Anonymous Information with Personally Identifiable Information (such as combining your name with your geographical location), we will treat that Anonymous Information as Personally Identifiable Information as long as it is combined with Personally Identifiable Information.

Cookies

We use “cookies” to provide you with a better online experience. A cookie is a small text file that can be placed on your system when you visit a website. Cookies allow us to collect both Personally Identifiable Information and Anonymous Information, such as browser type, time spent on a website, pages visited, language preferences, and information about your relationships with us. Cookies allow us to facilitate image changes, collect anonymous aggregate website traffic, provide certain discount, promotional and reward programs to you, and personalize our services to your needs. Our Site does not require users to accept cookies, and you can set your browser to notify you when you receive a cookie, giving you the opportunity to decide whether or not to accept it. If you choose not to accept cookies, you may experience some reduction in graphics and other personalized services. You also may need to accept cookies in order to maintain certain online advertising opt-out elections (see “Use of Information for Advertising; Opting Out of Online Behavioral Advertising” section below).

Use of Information for Advertising; Online Behavioral Advertising

We may use Personally Identifiable Information or Anonymous Information in connection with our online advertising activity. Online advertisements may be in the form of banner ads, splash ads, or other formats. These advertisements may appear at our Site, and we may contract with third party advertising companies to promote our products and services and serve related advertisements on websites and mobile applications that are owned or operated by parties not affiliated with us.

In order to better understand which of our products and services may be of interest to you and to tell you about those products and services, we may from time to time collect information about your online activities over time and across third party websites and online services. We also may engage third party service providers to collect information about your online activities over time and across third party websites and online services when you use our Site. Serving advertisements based on a person's online activities over time and across third party websites and online services is generally known as "online behavioral advertising." Here are some tips and other important information regarding online behavioral advertising:

- You can learn about how to exercise choice regarding the collection of information about your online activities by our third party service providers over time and across third party websites and online services by visiting <http://ads.bridgetrack.com/privacy.htm>.
- If you are given an opportunity to opt out from online behavioral advertising and you make an opt-out election, then in order to maintain the opt-out election at our Site and at other websites that might serve behavioral advertisements on our behalf, your browser must be enabled accept cookies. If you delete cookies, buy a new device, access our Site or other websites from a different device, login under a different screen name, or change web browsers, you will need to opt out again.
- You also may be able to avoid online behavioral advertising by disabling scripting in your browser. Please check the security settings in your browser to determine the status of scripting settings.
- Some browsers may provide a "do not track" or similar setting. Our Site does not respond to such settings. If you enable such a setting it will not prevent the collection of information about your online activities over time and across third party websites when you visit our Site.
- You should be aware that even if you exercise a choice not to receive targeted advertisements in connection with online behavioral advertising, your election does not necessarily stop the collection of information about your online activities over time and across third party websites and online services for purposes other than online behavioral advertising.
- You may still receive generic advertising (i.e., advertising that is not based on your online activities over time and across third party websites and online services) even if you opt out of online behavioral advertising, and opting out of online behavioral advertising may not result in the termination of advertising and promotions provided in connection with rewards programs we may offer.

We may share Anonymous Information with third party advertising companies with which we have contracted in order to support other targeted advertising, promotional, and rewards programs that we offer. You may opt out of rewards programs we offer and the targeted advertising and promotions that are associated with the programs. Please see the terms of the applicable rewards program for information about opting out.

Financial Planning Tools and Calculators

We may provide planning tools at our Sites to help you model transactions and make financial decisions. Examples of these tools include home mortgage calculators, auto loan calculators, and retirement calculators. We encourage you to try all of these as often as you like. When you use these tools at our Sites, the calculations may run on your device or on our server. We do not capture and retain the personal information you provide on these planning tools.

Social Media

We may from time to time use social media websites and applications (e.g., Facebook®, Twitter®, YouTube® and LinkedIn®) to interact with you and to communicate information about us and about our products and services. We may collect information from our interactions with you at such social media websites and applications, and we may use the information for the purposes and uses described in this Notice. Please review our Social Media & Community Guidelines (http://www.regions.com/about_regions/social_media_community_guidelines.rf) for more information. If we disclose any terms of use at specific social media pages that we manage, you also will be subject to those terms when you interact with those pages. The owners and operators of social media websites and applications may impose their own terms of use and privacy policies with respect to the use of their websites and applications. This Notice does not govern the use, handling, and treatment of content you may post at social media websites and applications by the owners and operators of those websites and applications. You should review the terms of use and privacy policies of any social media website or application that you use to make sure you understand your rights and obligations with regard to content that you post.

Children's Online Privacy

Our Sites are not directed to individuals under thirteen (13) years of age, and individuals under the age of 13 years should not provide Personally Identifiable Information through a Site. We do not knowingly collect information from individuals under the age of 13 years without parental consent.

Medical Information

When you use our Site to apply for or to obtain or use our products and services, we will not ask you to provide any Personally Identifiable Information that is personal health or medical information except as allowed or required by applicable law and as necessary to consider your application for or to provide such products and services. To the extent you provide any Personally Identifiable Information that is medical or personal health information, we will not use or disclose

such information except as allowed or required by applicable law, and we will protect such information as required by applicable law.

Security

To protect Personally Identifiable Information, we apply administrative, technical, and physical security measures. These measures include computer safeguards and secured files and buildings. In the event we share information with third party service providers or joint marketers, we restrict the ability of such parties to use or disclose the information we furnish. We also require such parties to apply appropriate security measures to protect information. For more information, please review the Regions Privacy Pledge to Consumers (http://www.regions.com/about_regions/privacy_pledge.rf) and our Online Security (http://www.regions.com/personal_banking/online_security.rf) page. Unfortunately, no data transmission or storage system can be guaranteed to be absolutely secure, and we disclaim any representation or warranty that our information security systems or those of our service providers and joint marketers are absolutely invulnerable to breach or compromise.

Links to Other Websites

The information and disclosures contained in this Notice apply only to our Sites. If you link to a third party website from our Site, the third party website will not be governed by this Notice. We recommend that you review the internet or online privacy notice for any third party website you visit, including any social media website or application (see “Social Media” section above).

Changes to this Notice

We may make changes or amendments to this Notice in our discretion. Any changes or amendments we make will be effective when we post them at the applicable Site, unless we expressly provide a different effective date. You agree that the posting of such changes or amendments at the applicable Site shall constitute effective notice thereof to you. You agree to review the Notice periodically to ensure that you are familiar with the current terms of the Notice. You acknowledge and agree that any changes we make are binding on you as of the effective date we dictate, but in any event your use of the applicable Site on or after the effective date constitutes your affirmative acceptance of such changes. The effective date set forth at the beginning of this Notice indicates when this Notice was last changed.

Questions about this Notice

If you have questions about this Notice, please call us at 1-800-4PC-BANK (1-800-472-2265) or visit <http://www.regions.com/contact.rf> for more information about how to contact us.