



PRIVACY NOTICE

Effective January 1, 2023

Keeping your information private and secure is very important to First National Bank of Omaha (“FNBO”). We want to make sure you know what information we collect, use, and share when you deal with us. We also want you to know what rights and choices you have over your information.

Please [click here](#) to see the Consumer form privacy notice.

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What does this Privacy Notice cover?

This Privacy Notice (“Notice”) applies to all contact you have with us about the consumer unsecured closed end installment loan product (“Product”). This includes in person, phone, mail, text, chat, email, or other contact. It also includes contact through any online site, mobile app, or social media account we own (“Sites”) unless we tell you otherwise. This Notice explains the information we collect, use, and share of yours related to the Product. Other privacy notices will apply to contact and information of yours not related to the Product.

This Notice does not apply to online sites that are not owned by us. This includes online sites, mobile apps, and social media sites owned by third parties or partners even if we provide links to them. Such sites will be subject to their own terms of use and privacy policies.

By accessing or using our Sites or otherwise disclosing information to us, you agree that you are providing freely given, specific, informed, and unambiguous consent to our collection, use, and sharing of your information in accordance with this Notice.

What information does FNBO collect about me?

The types of personal information we may collect and share depends on the product, service or contact you have with us. This information can include:

Categories of Information	Examples
Data used to identify you	<ul style="list-style-type: none"> ○ Name ○ Address ○ Email address ○ Phone number ○ Date of birth ○ Social security number ○ Taxpayer ID ○ Driver’s license number ○ Passport number ○ Government ID ○ IP address
Class information	<ul style="list-style-type: none"> ○ Race ○ Color ○ National origin ○ Marital status ○ Sex ○ Veteran status ○ Military status
Location data	<ul style="list-style-type: none"> ○ Physical location ○ Location movements
Biometric data	<ul style="list-style-type: none"> ○ Face prints ○ Retinal scans ○ Voice recordings ○ Fingerprints ○ Key stroke patterns ○ Key stroke rhythms
Business Data	<ul style="list-style-type: none"> ○ Business data ○ Company structure information ○ Company ownership ○ Property Records ○ Past purchase data
Device or other online activity	<ul style="list-style-type: none"> ○ Browser data ○ Search history ○ Type of device ○ Service provider Data
Professional or employment related information	<ul style="list-style-type: none"> ○ Occupation or job data ○ Income ○ Current job ○ Job history
Education information	<ul style="list-style-type: none"> ○ Transcript ○ Student records ○ Grades ○ Activities ○ School ○ School ID
Health information	<ul style="list-style-type: none"> ○ Medical history ○ Insurance information ○ Benefit plan information ○ Claims history ○ Payment history
Conclusions drawn from other information	<ul style="list-style-type: none"> ○ Person’s preferences ○ Trends ○ Behaviors
Personal records	<ul style="list-style-type: none"> ○ Family history ○ Powers of attorney ○ Trusts
Your correspondence with us	<ul style="list-style-type: none"> ○ Call records ○ Completed forms ○ Complaints ○ Survey responses ○ Site correspondence

Personal financial information	<ul style="list-style-type: none"> ○ Assets ○ Income 	<ul style="list-style-type: none"> ○ Credit reports ○ Property taxes
Details of your transactions and account	<ul style="list-style-type: none"> ○ Account information ○ Payment history ○ Government information 	<ul style="list-style-type: none"> ○ Credit information ○ All transactions ○ Merchant or third-party information

We collect information from a lot of different sources. These sources include you, third parties, the government, our partners, and our service providers. We collect information in a lot of different ways. These include collecting in person, by phone, through mail or email, by electronic transfer, or through our Sites.

We and our service providers may use various tracking technologies, including cookies, to collect information about you when you interact with our Sites, including information about your browsing and viewing behavior. Cookies are small data files stored on your hard drive or in device memory that help us improve the Sites and your experience, see which areas and features of the Sites are popular and count visits. In addition, when you access or use the Sites, our servers automatically record certain log file information, such as your Internet Protocol address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Sites.

Some information we collect may be classified as “personal information”. It may be personal information to the extent it can identify or be linked to a consumer or device. Personal information does not include information that is public or that can’t be linked to you. There are laws that apply to personal information and provide certain protections. For more details on these laws, please see below.

When does FNBO collect my personal information?

We collect your personal information, for example, when you:

- Open a checking account
- Apply for a mortgage
- Apply for a credit card or other loan
- Apply for a job with FNBO
- Open a business account
- Pay your bills
- Visit our website
- Use our products or services
- Contact us or respond to surveys

How does FNBO use my information?

All financial companies need to use and share customers’ information to run their day-to-day business. We may use information:

- To detect, look into or prevent activity that may be illegal, violate our policies, cause harm to our business or put our security at risk.
- To develop or improve our products, services, operations, and Sites.
- To reply to your questions or fulfill your requests. This includes to provide you with or to decide whether you qualify for products and services you request.
- To communicate with you about your accounts or transactions made with us.
- To provide you important details about our products or services. This includes telling you about changes to our policies, terms, agreements, or Sites.
- To allow you to take part in surveys, sweepstakes, contests, and other promotions.
- To comply with applicable laws.
- To send offers and promotions for our products and services or for other products and services.
- To customize online or mobile content and your experience.
- To confirm the identity or location of a person. This includes use for security reasons and to prevent fraud and limit other harm.

- To provide ads based on activity on our Sites.
- To run our business. This includes use for data analysis, audits, to identify use trends, and to determine how effective marketing campaigns are.
- To maintain records for internal administrative purposes.
- In connection with your employment (to the extent this applies to you).
- For any other purpose we tell you about at the time you provide us information.
- For any other purpose with your consent.

How does FNBO share my information?

We may share information as listed below.

- To companies we own and our affiliates.
- To contractors, service providers, and other third parties we use to help support our business.
- To third parties to market their products or services to you.
- To fulfill the purpose for which you provide it.
- With your consent.
- To comply with any court order, law, or legal process. For example, replying to a request of the government or a regulator.
- To enforce our terms of use of the Sites and other agreements, including for billing and collection purposes.
- If we believe disclosure is appropriate to protect the rights, property, or safety of FNBO, our customers, or others. This may include the exchange of information with third parties to prevent fraud and reduce credit risk.
- To a buyer or new owner in the event we merge, sell, or reorganize our business or any assets.
- We may share aggregated information about you, and information that does not identify any individual, without restriction.

We may also share information for any of the purposes we use information above. (See [“How does FNBO use my information?”](#))

Our sharing of information is subject to any rights available to you under applicable law. (See [“Why does FNBO share my information and what sharing can I limit?”](#))

Why does FNBO share my information and what sharing can I limit?

FNBO needs to share your personal information to run our business. The table below lists general reasons why FNBO shares information and your options for limiting what FNBO can share.

Reasons we share your personal information	Does FNBO share?	Can you limit this sharing?
For our everyday business purposes – Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – To offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes – Information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – Information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

For more detail on how we use or share information, please see [“How does FNBO use my information?”](#) or [“How does FNBO share my information?”](#)

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. (See "[What additional privacy rights do California residents have?](#)" and "[What is different for Vermont residents?](#)")

How can I limit what information FNBO shares?

- Call: 855-550-9124 – To review and select your choice(s), or
- Visit your loan Self Service portal to select your privacy preferences.

How can I limit advertising or web tracking?

You can find more details or opt out of certain ads and cookies by viewing the "Modify Privacy Options" link on the [FNBO website](#).

How can I contact FNBO?

If you have any questions or comments about this Notice, please do not hesitate to contact us at:

- Call: 855-550-9124
- TDD/TTY available at 1-800-925-2833
- Visit "[Contact Us](#)" on our Website or Click [here](#)
- Email: firstnational@fnni.com
- Mail: First National Bank of Omaha
1620 Dodge Street, Stop Code 3089
Omaha, Nebraska 68102

How does FNBO use internet cookies and similar tracking?

Internet Cookies, Do-Not-Track Signals, and Similar Technologies

When you visit our Sites, we may collect information about you using cookies. A cookie is a file containing data placed on a computer or mobile device. A cookie can contain data about the websites you visit, how long you view them, what you view, and what you click. The cookies that we use do not track activities that occur on websites other than our own.

We may use cookie information for the following:

- for your or our security
- to provide a product or service you request
- to improve user experience with our Sites
- to provide offers that are of value to those who visit our Sites

In addition, we may use cookie information for any of the purposes we use or share information above. (See "[How does FNBO use my information?](#)" or "[How does FNBO share my information?](#)")

A web browser may have an option to request other websites to not track a user ("Do-Not-Track Signals"). While not all of our Sites currently recognize Do-Not-Track Signals, declining to accept cookies will ensure that online activities on our Sites are not tracked. Doing so, however, may impact or disable some of our Sites' functionality and/or your

user experience. While cookies are not required to browse our Sites, they may be required for access to accounts. Visit the “Modify Privacy Options” link at the bottom of this page to opt out of certain advertising and web analytic cookies.

Our Sites may also use tracking pixels or other similar technologies to track activity and collect data. These can be included in online ads, e-mails or on our Sites.

We may work with certain third parties to collect, analyze, and use some of the information described above. For example, we may allow third parties to set cookies or use web beacons on the Sites or in email communications from FNBO. The information collected by third parties using these technologies may be used to engage in analysis and reporting. These third parties may set and access cookies on your computer or other device and may collect information about your online activities across different websites or services over time, including on websites and mobile applications that are not owned or operated by FNBO. Any personal information that we provide to third parties is subject to restrictions on use contained in written contracts or agreements or industry practice.

In addition, we may use service providers to place ads for our products and services on other websites. We also use service providers to help us determine which of our ads are likely to be of interest to you. Ads placed by these service providers may use tracking technologies that monitor how you respond to such ads. We limit these service providers to only use or collect information to help us with our ads.

Mobile Applications

We offer you the ability to access some of our products and services through mobile apps. When you use these mobile apps, we may collect information such as:

- unique device identifiers for your mobile device
- your screen resolution and other device settings
- information about your location
- analytical information about how you use your phone

We may ask for your consent before collecting certain information through the mobile app including your location. Our mobile apps may also include third party software development kits (“SDKs”). SDKs allow us and our service providers to collect information about your mobile app activity. We use mobile app information for similar purposes of cookie information.

FAQs and other important information

Definitions:	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies: Our affiliates include financial institutions, insurance agencies, title companies, mortgage companies, securities broker-dealers, and trust companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates we share with can include service providers, insurance agents, retailers, credit card marketing companies, and nonprofit organizations
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include card associations and other financial institutions.
Sites	Means all contact points you have with FNBO. This includes in person, phone, mail, text, chat, email, or other contact. It also includes contact through any online site, mobile app, or social media account we own.
“FNBO”, “we”, “us” and “our”	Means First National Bank of Omaha.

How does FNBO protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that include computer safeguards, secured files and buildings.

We are deeply committed to maintaining industry standard levels of security that comply with applicable federal and

state laws to help protect the personal information that we collect.

For additional information on our security practices see our [“Security Center”](#).

How will I find out about changes to this Notice?

We may change this Notice at any time. The most current version of this Notice will be posted on our Site and is available upon request. If we make material changes to the Notice, we will let you know through a notice on our Sites. Any changes will be effective when we post the updated Notice to the Sites. You accept the terms of any updated Notice we post by using the Sites. Please check the Notice often for updates.

When can FNBO begin sharing my information?

If you are a new customer, we can begin sharing your information thirty days from the date we sent this notice. When you are no longer our customer, we can continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing (See [Why does FNBO share my information and what sharing can I limit?](#))

What is different for children?

We recognize that protecting children's identities and privacy is important. We do not intentionally or knowingly market to or solicit information from children under thirteen without the affirmative consent required under applicable law. If you are under thirteen, do not use or provide any information on our Sites or on or through any of its features or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or username you may use. If you believe that we have collected personal information from children under thirteen, please contact us at firstnational@fnni.com.

What additional privacy rights do California residents have?

If you are a California resident, you may have additional privacy rights. However, information governed by certain privacy laws noted below are specifically excluded from the rights granted under California law.

Unless there is an exclusion, a resident of California has the following rights related to personal information:

- **The right to know and access.** The right to request that we give you certain information about our collection, use, disclosure and sale of your personal information during any specific time period. Once we receive and verify your request, unless subject to an exception, we will disclose to you the following:
 - the categories of personal information collected
 - where we collected it from
 - why we collected it
 - the categories of third parties we shared it with
 - the specific pieces of personal information collected about you

If you exercise your right to know or access, we will strive to give you the information requested for the specific time period requested. If you choose to exercise your right to know or access and do not specify a time period, we will strive to give you all of the requested information collected or maintained after January 1, 2022, unless doing so would be impossible or involve a disproportionate effort. In the case that fulfilling a request to know or access proves impossible or involves a disproportionate effort, we will strive to give you the requested categories of information collected or maintained by us in the immediately preceding twelve months from the date of your request.

- **The right to deletion.** The right to request we delete the personal information that we or our vendors collected from you and kept. There may be circumstances under which we will be unable to delete your personal information, such as if we need to comply with our legal obligations or complete a transaction for which your personal information was collected. If we are unable to comply with your request for deletion, we will let you know the reason why.
- **The right to correct inaccurate personal information.** The right to request that any of your inaccurate personal information that is maintained by us be corrected, taking into account the nature of the personal information and the purposes of the processing of the personal information.

- The right to portability. The right to request that we transmit your personal information to another entity in a portable, easily understandable, and to the extent technically feasible, in a structured, commonly used, machine-readable, and readily usable format.
- The right not to receive discriminatory treatment. The right to not be discriminated against if you exercise any rights under California privacy laws. We will not discriminate against you for exercising any such rights.

Only a resident of California or a person who has authority to act on behalf of a resident of California may submit a request. You do not have to open an account with us to make a request. To submit a request, you may click [here](#) or call us toll free at 1 (855) 578-8488. You may make a request for access or data portability two times within twelve months.

To verify your request and identity, we may need you to provide more information. We may require you to provide written consent to allow a person to submit a request for you. We may require a person who submits a request for you to verify his or her identity. If we require such consent or verification and we do not receive it, we may deny the request. We are not able to respond to a request if we are not able to verify your identity. If we are not able to verify authority of a person who submits a request for you, we are not able to respond to the request.

We will try to confirm receipt of a request within ten days after we receive it. We will try to respond to a request within forty-five days after we receive it. If more time is needed to respond, we will let you know and tell you why more time is needed. We will send you the response by mail or electronically, at your option. Any information we provide will only cover the twelve-month period prior to receipt of your request. If we deny a request, we will tell you the reasons for the denial in our response. We may deny your request to exercise any of the rights listed herein if we have a good faith, reasonable, and documented belief that such request is fraudulent.

We did not sell or share, each as defined by California law, personal information of a California resident, including the personal information of California residents under sixteen years of age, in the past twelve months. We do not sell or share, each as defined by California law, personal information of California residents, including the personal information of California residents under sixteen years of age, at this time. These two statements and California residents' rights are subject to exclusions tied to privacy laws including:

- the Fair Credit Reporting Act (FCRA)
- the Gramm-Leach-Bliley Act (GLBA)
- the California Financial Information Privacy Act (FIPA)

While we may collect and store personal information that would be considered your sensitive personal information under California law, we will not use or share your sensitive personal information except (i) to perform the services or provide the goods you've requested; (ii) to prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity or confidentiality of stored or transmitted personal information; (iii) to resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for those actions; (iv) to ensure the physical safety of natural persons; (v) for short-term, transient use; (vi) to verify or maintain the quality or safety of any of our products, services, or devices and to improve, upgrade, or enhance any of our products, services or devices; or (vii) for purposes that do not infer characteristics about you.

We will retain your personal information, including sensitive personal information, for no longer than is reasonably necessary for the purpose(s) for which it was collected. In certain cases, it may be necessary for us to keep personal information for an extended period of time in order to comply with a legal obligation or for the establishment, exercise, or defense of a legal claim, in accordance with applicable law.

What is different for Vermont residents?

We will not share information about your creditworthiness with our affiliates and will not share your personal or creditworthiness information with nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to do so. For joint marketing, we will only share your name, contact information, and information about our transactions and experiences with you.

What do international users need to know?

Bank products, services, and Sites are (i) offered and hosted in the United States, (ii) subject to U.S. law, and (iii) are intended for users located only in the U.S. If you are accessing the bank products, services, and Sites from outside the United States, please note U.S. law may not offer the same privacy protections as the laws of your jurisdiction. By accessing and using bank products, services, and Sites, you consent to the transfer to and processing of your personal information in the U.S.