

Online Privacy Policy

LAST UPDATED: DECEMBER 2, 2022

Recognition of your expectation of privacy

We recognize and respect the privacy expectations of our clients. To meet those expectations, the Bank maintains policies and procedures to safeguard your personal information. All consumer personal information collected, processed or disclosed is pursuant to the Federal Gramm-Leach-Bliley Act (Public Law 106-102) and implied regulations. You may have other privacy protection under the applied State Law and to the extent applicable. We will comply with those provisions.

Protecting online applications

When you apply online for accounts or services, enroll in Online Banking, and/or download TotalDirectBank's mobile application available on platforms that include but are not limited to Google Play and Apple's App Store, you provide personal information that is necessary for us to process your application, and/or provide features of our Online Bank and mobile app to you. To ensure that your application remains confidential, the information is sent to us in a "secure session". After you have submitted your application online, we recommend that you end your browser session before leaving your computer. We, along with the outside companies with which we work, if applicable, may keep the information you provide to us, along with information we collect from outside sources, so that we can offer you accounts and services related to your financial needs.

Linking to Third-party Websites

The Bank 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.

How we handle e-mail

We preserve the content of your e-mail, your e-mail address and our response so that we can more efficiently handle any follow-up questions you may have. We also do this to meet legal and regulatory requirements. If we think that a particular TotalDirectBank account or service might apply to your situation, we may occasionally contact you at your e-mail address to inform you of potential benefits and availability.

What we do with online surveys

The information you provide on surveys and promotions on our website will be used for internal marketing purposes, including developing website information and services that you may find helpful. In addition, we may inform you of new accounts and services from TotalDirectBank based on the information you provide to us.

No data "capture" with planning tools

There are many planning tools throughout the site to help you make the financial decisions that are right for you in the privacy of your home. We encourage you to try all of your "what-if" scenarios as often as you like. Examples include the mortgage principal and interest calculator and the savings goal calculators.

When you use various planning tools on our website, the calculations run on your PC or our server. We do not capture the personal information you provide on these planning tools.

Maintenance of accurate information

We have standards and procedures to ensure that your financial information is accurate, current and complete in accordance with commercial standards. We will respond to your request to review and correct inaccurate information in a timely manner.

Protecting your online banking

When you bank online with us and/or access our mobile app, we, along with the outside companies we work with to bring these services to you, have access to your information. Information is retained on our system or the system of the appropriate outside company, depending on what is required to serve you.

We use state-of-the-art Internet technology, supported by the outside companies we work with, to make Online Banking secure and to protect your personal information.

We also require a username and password and, as applicable, we may require an out of band authentication code delivered to you via text or email, in order to access your accounts. If you do not provide this information, we cannot establish an Online Banking service for you. You can also help maintain the security of your banking information by not sharing your username or password with anyone, by changing your password regularly, and by remembering to sign off.

When information is collected and not collected

Some areas of our website and/or mobile app require personally identifiable information, such as your name, e-mail address, phone number, physical address, financial information, your account number, or access to your contacts to enable you to perform certain tasks (for example, review your accounts or correspond with us). In these cases, we collect your information if necessary to interact with you and/or provide our banking services.

If you do not interact with us, you browse our website anonymously, and personal information, such as your e-mail address, is not collected.

We gather and analyze data regarding usage of our website and/or mobile app, including domain name, number of hits, pages visited, length of user session, etc., to evaluate the usefulness of our services. Personally identifiable information and non-public contact information will not be disclosed other than for purposes described herein.

About "cookies" and "unique identifiers"

To provide better service and a more effective website, we use "cookies" as part of our interaction with your browser. A "cookie" is a small text file placed on your hard drive by our web page server. These cookies do not collect personally identifiable information, and we do not combine information collected through cookies with other personal information to determine who you are or your e-mail address. Cookies are commonly used on websites and do not harm your system. By configuring your preferences or options in your browser, you determine if and how a cookie will be accepted. We use cookies to determine if you have previously visited our web site and for a number of administrative purposes.

In addition, our mobile app may use unique identifiers, including but not limited to, a string of characters specific to your mobile device, GPS location, camera and/or photos access, and information about the network your mobile device is connected to, and your IP address. Any time you access the mobile app we collect and receive information about the different devices you use and how you use them. We may use this information to measure the frequency of users accessing specific features and/or functions of the mobile app, to help us make the app more useful for users, fraud prevention, as well as security and compliance purposes.

In addition, your precise location (linked to your identity) and/or approximate location may be collected to help target advertisements and for internal marketing purposes based on your location.

Limiting employee access to information

We have procedures to limit employee access to your personal information to those with a business reason for knowing such information. We educate our employees to understand the importance of confidentiality and client privacy. We take appropriate disciplinary measures to enforce employee privacy responsibilities.

Protecting our children

We do not knowingly solicit data from and market to children under the age of 13. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so resides with both the online industry and with parents.

Restrictions on the Disclosure of Account information

We do not reveal specific information about client accounts, including but not limited to, client financial information, payment activities, transactions or other personally identifiable data to unaffiliated third parties for their independent use, except for the exchange of information with reputable information-reporting agencies, unless 1) the information is provided to help complete a client-initiated transaction; 2) the client requests it; 3) the disclosure is required by/or allowed by law (e.g., subpoena, investigation of fraudulent activity, etc.), or 4) the client has been informed about the possibility of disclosure for marketing or similar purposes through a prior communication and is given the opportunity to decline to necessary. [Download a copy of the bank's consumer Privacy Notice.](#)

The Fair Credit Reporting Act requires that we notify you of your right to ask that we not share certain outside credit information with companies affiliated with TotalDirectBank. If you do not want such (i.e. Consumer Credit Reports) shared among TotalDirectBank affiliates, you may notify us in writing of your instructions at any time. To do so, please send your name and address (as they appear on your account statement), and Social Security number to:

TotalDirectBank
Attention: CIS Department
PO Box 025620
Miami, FL 33102-5620

Please Note: All accounts with the primary Social Security number noted in the request will be affected.

Count on our commitment to your privacy

You can count on us to keep you informed about how we protect your privacy and limit the sharing of information you provide to us - whether it's at a banking center, via a phone call, through the Internet, or our mobile app.

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.