



Children's Online Privacy Policy

Protecting your child's privacy is important to us. BayCoast Bank complies with the Children's Online Privacy Protection Act (COPPA) to protect children's privacy online. COPPA requires us to inform parents and legal guardians how we collect, use, and disclose personal information from children who are under 13 years of age. The following information does not apply to children who are 13 years of age or older.

We do not purposefully or intentionally market to children. However, under certain circumstances, such as when you allow your child to create an online banking profile, your child may have access to some of our services.

BayCoast Bank partners with Banzai, Inc. to deliver the online financial literacy component of the RightStart program. Banzai never knowingly collects personal information from any user under the age of 13. More information regarding Banzai's COPPA compliance practices can be obtained by contacting Banzai:

By email: support@banzai.org

By telephone: (888) 822-6924

By mail: 2230 N University Pkwy, Suite 14, Provo, UT 84604

Information We Collect from Children

If you open a RightStart account and allow your child to be an authorized user on the account, we will ask you to consent to our collection, use, and disclosure of your child's personal information in connection with that account. At account opening, we will ask for your child's name, address, date of birth, telephone number, email address, and Social Security Number. Your child will also need to input this information when registering for their online and mobile banking profile. To access online or mobile banking, your child will also need a username and password. Your child may be able to change some of this information within his or her online profile. You may not receive notice if this happens.

We may also receive and store certain types of information automatically when your child interacts with the Bank online or through our mobile banking apps, including when your child views activities or links while on our web site. This data is collected through session cookies when your child engages with the online banking platform.

We will not require you or your child to provide more information about the child than is reasonably necessary. If we discover that we have collected information from a child in a manner inconsistent with COPPA, we will take appropriate steps to delete the information or seek consent from a parent or legal guardian.

How We Use Children's Personal Information

Information collected from children (including personal information and information collected automatically) is never used or disclosed for third-party or behaviorally-targeted advertising. We never sell or rent children's personal information, including to marketers, advertisers, or any other third-parties. We use children's information in the following ways: to provide our services, process transactions, verify their identity, respond to their requests and communicate with them, perform analytics about how they use our services, improving our businesses, for security and safety purposes, to prevent fraud, as required by law or contract, to enforce our terms and account agreements, track progress in the financial literacy component of the RightStart Program, offer incentives to continue participating in the Program, and for

any other use that we disclose to you in connection with your RightStart account. Where permissible, we may also use children's data that has been collected on an aggregate or anonymous basis (meaning that your child is not identified) for various business purposes.

Please be aware that by allowing your child to have an online banking profile, you are consenting to your child viewing our normal marketing messages that may be displayed to all accounts, even though we will not use your child's information to specifically target and advertise other products or offerings until the child is of legal age.

Disclosure of Children's Personal Information

We may share children's personal information with our affiliates and other third parties where necessary and permitted. For example, we may share their information with our service providers, our affiliates, to comply with legal requirements, to enforce our terms and other rights and policies, to address fraud, security or technical issues, to respond to an emergency, or where it is otherwise necessary to protect our customers or third parties.

We do not allow children to make their personal information publicly available through our services.

Third Party Tracking and Data Collected

By default, your child will be opted out of data sharing with third party vendors until they reach the age of 18. However, the following third parties will receive certain data in order to provide the RightStart Program services, which you do have the ability to opt out of as a participant in the RightStart Program:

i. MX Money Management

As an exception to third party data sharing, once the designated, authorized child enrolls and accesses Online Banking, the child will be provided access to MX Money Management, which is a tool designed to allow the child to set goals and track their finances. Access will be given to the child via a single sign-on, with encrypted data sent to third party, MX. This data cannot be decrypted, and MX will only store the encrypted data values. Data passed through to MX includes name, account numbers, transaction data, as well as any outside financial institution information that your child wishes to connect to MX.

ii. Live Person

As a means of better supporting customers, BayCoast Bank has enlisted Live Person to offer secure chat support. If your child engages with a support representative through this platform, their session data will pass through to Live Person. This includes name and account information, as well as chat transcripts. Each LivePerson user is provisioned with a unique Conversational Cloud account (site ID), and each request to the LivePerson servers is based on that unique identifier. All consumer (web visitors, mobile messaging, etc.) and agent interactions go through the Conversational Cloud platform for control and validation, and to help ensure appropriate segregation and security. Independent security vulnerability assessments and penetration tests are performed on a regular basis, with specific test cases and scenarios that focus on the effectiveness of user controls.

iii. Banzai

As part of the RightStart Program, the Bank will offer financial literacy modules suitable to the child's age through a third party, Banzai. To track and monitor the child's progress with the modules, Banzai will collect the child's full name and email address.

Should you, as the parent/legal guardian and account owner, wish to have this service disabled for the child, you may do so by emailing the Bank at ecommerce@baycoastbank.com or by calling 508-678-7641. Upon receipt of notice, the Bank will disable the child's access to these third parties within 3 business days.

Additionally, data on your child's online banking session, as well as tracking of the session, may be collected via third party cookies when using the Bank's online and mobile banking. You have the ability to opt out of these cookies within your web browser or in your phone's settings.

Parental Rights

BayCoast Bank will not require a child to disclose more information than reasonably necessary to participate in the online features of the RightStart Program.

Parents and legal guardians have the legal right to request and review the personal information the Bank has collected from your child online, refuse to allow further use or collection of personal information from your child, and delete the personal information we have collected from your child online (unless we are required by law to retain it). Parents and legal guardians can also agree to the collection and use of their child's information, but not allow disclosure of that information to third parties unless required by the RightStart Program. However, if you decide that you do not want us to use or collect your child's personal information, or you ask us to delete it, we may have to remove their online banking profile.

To exercise any of these rights, please contact us:

By email: ecommerce@baycoastbank.com

By telephone: (508) 678-7641

Last Updated: December 2023