

FIRST CITIZENS BANK MOBILE BANKING APPLICATION PRIVACY POLICY

This Mobile Privacy Policy (“Policy”) applies to users of the First Citizens Mobile Banking Application (“App.”) through First Citizens Bank Limited. The term “First Citizens”, “Bank” or “we”, “us” or “our(s)” in any mobile banking application we own and control and in this Policy refers to First Citizens Bank Limited and our affiliates.

Your privacy is important to us. This online privacy policy explains how we collect, share, use and protect information when you visit or use this mobile banking app. As you review this Mobile Privacy Policy, here are a few general principles to keep in mind:

1. Agreement to Policy

By downloading the First Citizens Mobile Banking App. on your mobile device, you consent to this Policy which includes your consent to disclose and use information about you in the manner detailed in this Policy.

2. Gathering, Using and Sharing: Information that we collect

Information that we may collect about you through mobile banking includes information that you voluntarily disclose such as your name, address, phone number, email address and other contact information; transaction information, information resulting from your mobile activity and your location information. We may also gather additional information associated with your mobile device through cookies and other technologies as described below.

3. Usage and Other Information

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, the type of operating system and browser you use, and information about the site you came from, the parts of our online service you access, and the site you visit next. We or our third-party partners may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you.

4. First Citizens Mobile Banking Service

For your convenience, First Citizens offers you the ability to access some of our products and services through mobile banking applications. When you interact with us through First Citizens Mobile Banking App., we may collect information such as unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device.

5. Location Tracking

There may be certain information transmitted to us regarding your location when you request information through applications on your mobile device, such as your physical location when accessing the App. Location data we collect from your mobile device will assist us in mitigating against any potential breaches or unauthorized access to customer information.

6. Working with Other Companies.

From time to time, First Citizens may establish relationships with other companies in a bid to provide you with additional value and products and services. In these circumstances, we will treat your personal information in the same manner described in our Privacy Policy.

7. Use of Information

We use the information discussed above in a number of ways, such as:

1. Processing applications and transactions.
2. Verifying your identity (such as when you access your account information).
3. Preventing fraud and enhancing the security of your account or our online services.
4. Responding to your requests and communicating with you.
5. Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies.

8. Disclosure of Information

We may share the information we collect from and about you as well as information about your Accounts or the transfers you make, with our affiliates within the First Citizens Group, with credit reference agencies and with any third parties with whom we have signed Non-Disclosure Agreements. For example, we may share your information for the following:

1. To comply with the requirements of the law or with court orders
2. Where required in the interests of the public or to protect the Bank's own interest, including where required to address, rectify, ameliorate or mitigate fraud, security or technical issues.

9. Security Measures

User IDs and Passcodes are used to help safeguard against unauthorized access to your information through the Mobile Banking Application or Mobile Web. As always, we strongly encourage you to assist us in that effort by not sharing your First Citizens Mobile or Web Banking User ID and Passcodes with anyone.

10. Questions and Concerns

If you have any questions about this Policy or our privacy practices, please contact our Telephone Banking Center at 62-FIRST OR email FCB-E-BANK@firstcitizenstt.com or channelsupport@firstcitizenstt.com

11. Policy Updates and Effective Date

This Policy is subject to change and any changes to this Policy will become effective when posted on this application. Your use of the application following these changes means you accept the revised Policy.