

## **Your Privacy Rights**

### **Huntington's Online Privacy Policy**

This Online Privacy Policy ("Online Policy") applies to The Huntington National Bank, its parent Huntington Bancshares Incorporated and their subsidiaries and affiliates (collectively described as "Huntington," "we," or "us"), this website and any Huntington website, online interface, mobile site, or mobile application that links to this Online Policy (each a "Site, and collectively "Sites"). This Online Policy specifically applies to Huntington's collection, use and disclosure of information collected from visitors during use of the Sites, such as for transactional purposes or through tracking technology, including cookies or action tags. This Site and all Huntington Sites are operated in and controlled from the United States of America. This Online Policy should be read together with the "What Does Huntington Do with Your Personal Information" Privacy Notice ("Privacy Notice") below, which, among other things, describes how Huntington may share personal information gathered from you and how you can opt-out or limit certain types of information sharing.

#### **Effective Date**

This Online Policy is effective as of August 2018.

#### **Changes to this Online Policy**

We reserve the right to amend this Online Policy at any time to address future developments of Huntington, our Sites or changes in industry or legal trends. We will post the revised Online Policy on this Site or announce the change on this Site's homepage. If we make changes to this Online Policy, we will revise the "Effective Date" section above. Any changes to this Online Policy will become effective upon the posting of the revised Online Policy on this Site. By continuing to use the Site following such changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Online Policy, as it may be amended from time to time, in whole or in part, please do not continue using our Sites. If you have any questions or comments about this Online Policy, please feel free to contact us at [privacy@huntington.com](mailto:privacy@huntington.com).

#### **Types of Information Collected**

We collect Personal Information and Aggregate Information from visitors or users of our Sites. We use the term "Personal Information" to mean any information that can identify a specific individual. We use the term "Aggregate Information" to refer to any information that does not allow us to identify a specific individual, such as demographic information, information about the Device used to access our Site(s) ("Device"), browser information or areas visited on our Sites.

#### **Personal Information**

Personal Information includes information that you may provide to us when you visit our Site(s) such as name, address, email address, phone number, mother's maiden name, Social Security number, date of birth, driver's license, employment, income, residence, and collateral information. For example, you may provide Personal Information when you complete an online application for a new banking product, when you enroll in our online or mobile banking services or when you complete online fields with your contact information.

### **Aggregate Information**

We may gather and store Aggregate Information about Site visitors and Site users. The collection of this Aggregate Information enables us to measure the number of visitors to various portions of our Sites, diagnose problems with our Sites, administer our Sites, track visitor activity, detect and prevent fraud and enhance the security of our Sites. We may collect information regarding the type of Device or browser you are using, the Device IDs, the IP address of your Device, the advertising ID of your Device, your screen resolution and other Device settings, information about your operating system, your location, your internet or mobile service provider, and how you use our Sites. We will use Aggregate Information to learn more about what you and our customers are expecting from our services to improve our Sites. Because Aggregate Information collected on our Sites does not personally identify you, we may use Aggregate Information for any purpose whatsoever and share Aggregate Information with third parties for any purpose whatsoever.

### **Association of Aggregate Information with Personal Information**

We may now, or in the future, associate or combine some or all of the Aggregate Information we collect about you with your Personal Information in order to provide you with more relevant content and marketing messages when you visit our Sites. For example, if you are an online banking customer we may be able to associate your Aggregate Information with your customer profile. This may allow us to provide you with tailored content when you visit our Sites. Please note: the association of Aggregate Information with Personal information does not change how we treat your Personal Information. Personal information is not stored or transmitted by cookies and is not shared with third parties to provide online behavioral advertising on third party websites. You should refer to the "Personal Information," "Use of Cookies or Similar Technologies," and "Online Behavioral Advertising" sections for more information.

### **Use of Cookies or Similar Technologies**

Cookies or other similar technologies may be used to gather information on our Sites. Cookies are electronic files that your internet browser places on your hard drive or other Device to retain information relating to visits to and use of our Sites. We use cookies to improve the functionality and performance of our Sites. We may also use cookies or other similar technology to associate or combine your Aggregate Information with your Personal Information (please refer to the "Association of Aggregate Information with Personal Information" section above for more information on this practice.). We do not use cookies to store or transmit Personal Information. We use cookies to enable our customers to navigate more easily within our Sites during a session. We use "persistent" cookies to allow you to set and maintain your preferences for using our Sites. Persistent cookies remain on your Device's memory after you close your internet browser or mobile application.

We also use 1x1 pixel "action tags," which are types of tracking technology associated with cookies. Action tags help us know how many visitors link to our Sites from a third-party website, which areas of our Sites visitors use most often, and how much time visitors spend at our Sites. We provide this type of Aggregate Information to a nonaffiliated application service provider that compiles statistical information for us. Collection of this data enhances Huntington's ability to meet the needs of our online and mobile users and make improvements to the online and mobile experience.

You can block cookies by changing the settings on your internet browser or through the use of software programs specifically designed to block cookies. Please note, however, that if you choose to block cookies, you will not be able to log into our secure Online Banking service, and you may limit other functionality we can provide when you visit our Sites. You can also remove cookies by deleting them from your Temporary Internet or Cookies folder. Blocking or deleting cookies may also impact our ability to honor certain online behavioral advertising opt out choices you have made. See the “Online Behavioral Advertising” section below for more information.

### **Adobe Device Co-Op**

Huntington participates in the Adobe Marketing Cloud Device Co-op, which helps us better understand how you use our website and provide advertisements tailored for you across all your devices (devices could include a desktop, laptop, tablet, or phone). The Device Co-op recognizes which of your devices are being used by the same person. The Device Co-op does not collect or store your personal information. Visit the [Adobe website](#) for more information on cross-device tracking and/or how to unlink your devices.

### **Online Behavioral Advertising**

We may engage third party advertising companies to serve ads on Huntington's behalf across the internet. Huntington is not providing, and these companies do not collect, your Personal Information. These companies may use behavioral information (which is considered Aggregate Information) obtained from cookies, action tags, or similar technology, such as how you navigate websites, to provide personalized Huntington advertisements tailored to your interests. This type of advertising is often referred to as “Online Behavioral Advertising” or “Interest-Based Advertising.” We may also engage these companies to track and report performance of advertising and marketing campaigns to and from Huntington. These companies may not use your behavioral information for any purpose other than to deliver Huntington advertisements on the internet. To learn more about this type of advertising please visit the Network Advertising Initiative at [www.networkadvertising.org](http://www.networkadvertising.org).

You can opt out of certain Huntington advertisements on third party websites that have been tailored to your interests by either: visiting [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices); or, by clicking on the YourAdChoices Icon contained in the ad. Keep in mind that this opt-out works using cookies, so if you delete cookies, then you will need to opt out again. Also, if you use different browsers or devices, you will need to opt out for each one individually.

Please note: even if you opt out, you may still see advertisements from Huntington while browsing online; but they may be less relevant to you and your interests because they won't be based on information collected about you.

### **Browser Settings**

Our Sites do not recognize Web browser “do not track” signals or other mechanisms. For more information about opting out of certain types of advertising, please see the Online Behavioral Advertising section above.

### **Our Use of Personal Information**

Consistent with our Privacy Notice, we use Personal Information provided by Site visitors to fulfill the

purpose for which such information was provided, such as to open an account for you, to process a transaction authorized by you, to send you information we think may be of interest to you, to evaluate your suitability for a job if you apply on line through the Careers section of our Site, or as specifically disclosed at the time the information is requested.

We also may remove identifiers from Personal Information or aggregate that information to make it anonymous. We will use such Aggregate Information as described in the "Aggregate Information" section.

You authorize your wireless carrier to disclose information about your account, such as subscriber status, payment method and device details, if available, to support identity verification, fraud avoidance and other uses in support of transactions for the duration of your business relationship with us. This information may also be shared with other companies to support your transactions with us and for identity verification and fraud avoidance purposes.

### **Disclosure of Personal Information**

We may disclose Personal Information, as permitted by law, and: (1) consistent with our Privacy Notice; (2) to comply with applicable laws; (3) to respond to governmental inquiries or requests; (4) to comply with valid legal process; (5) to protect the rights, privacy, safety or property of Huntington; (6) to permit us to pursue available remedies or limit damages that we may sustain; and (7) to enforce our rights resulting from inappropriate use of our Sites.

In the event there is a change in the corporate structure of Huntington such as, but not limited to, merger, consolidation, sale, liquidation, or transfer of substantial assets, Huntington may, in its sole discretion, transfer, sell or assign information collected on and through our Sites, including without limitation, Personal Information concerning visitors, to one or more affiliated or unaffiliated third parties.

### **Your Choice About Receiving Promotional E-mails**

Visitors may choose not to receive promotional e-mails or electronic newsletters from us by following the instructions in the specific email from which they wish to opt-out. We will respond to a request made pursuant to this method as promptly as practicable. Even if you elect to stop receiving promotional emails from us, we may still contact you through email to tell you important information about our Sites or us, or in response to a transactional or service related matter.

### **Maintaining Accuracy in Online and Mobile Information**

We strive to maintain complete and accurate online and mobile information about you and your accounts. If you believe that our records contain inaccurate or incomplete information about you, please call us toll-free at 1-800-480-BANK (2265) (24 hours a day, seven days a week). Our Online and Mobile Banking customers may access and edit their own information by logging in to our secure Online Banking service and clicking on the "Customer Service" tab. We will correct any confirmed inaccuracies as necessary and appropriate.

### **Children's Information**

We respect the privacy of children and comply with the practices established under the Children's

Online Privacy Protection Act. We do not knowingly collect or retain personally identifiable information from children.

### **Safeguarding Personal Information**

We employ appropriate safeguards to protect Personal Information that you provide to us through our Sites. Unfortunately, no method of transmitting or storing data can be guaranteed to be 100% secure. As a result, although we strive to protect Personal Information, we cannot ensure the security of any information you transmit to us through or in connection with our Sites. If you have reason to believe that your interaction with us is no longer secure, please notify us of the problem by contacting us at [privacy@huntington.com](mailto:privacy@huntington.com)

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

We may include links in our emails that link you to information on our Sites about our products, services, and special pricing or promotional offers. However, we will never ask you for Personal Information in an email from us (for example, username, password, Social Security number or account number). We will also never include links that take you to a non-secure page where you are asked to provide this information. To determine whether an email that you have received from Huntington is legitimate, you may contact our Customer Service Center toll-free at 1-800-480-BANK (2265) (24 hours a day, seven days a week). You can find more information and tips on ways you can protect yourself by visiting our Privacy and Security section at [huntington.com/privacy-security](http://huntington.com/privacy-security).

If you receive an email or other correspondence requesting that you provide any sensitive information via email or to a Site that does not seem to be affiliated with us, or that otherwise seems suspicious to you, please do not provide such information and report such request to us at [idtheft@huntington.com](mailto:idtheft@huntington.com).

### **Web Linking Practices**

We may provide access to information, products or services offered on websites that are owned or operated by other companies ("Third Party Websites"). We provide this access through the use of hyperlinks that automatically move you from a Huntington Site to the Third Party Website.

While we do our best to provide you with helpful, trustworthy resources, we cannot endorse, approve or guarantee information, products, services or recommendations provided at any Third Party Website. Because we may not always know when information on a linked site changes, Huntington is not responsible for the content or accuracy of any Third Party Website. Huntington shall not be responsible for any loss or damage of any sort resulting from the use of a link on its websites nor will it be liable for any failure of products or services advertised or provided on any Third Party Website.

Huntington offers links to you on an "as is" basis. When you visit a Third Party Website by using a link on our Sites, you will no longer be protected by Huntington's privacy policy or security practices. The data collection, use, and protection practices of the Third Party Website may differ from the practices of our

Sites. You should familiarize yourself with the privacy policy and security practices of Third Party Websites that you choose to visit. Those are the policies and practices that will apply to your use of the Third Party Website, NOT Huntington's policies and practices (unless otherwise disclosed to you).

Products, services, and benefits offered by third parties at Third Party Websites are obligations of those third parties, are not an obligation of, a deposit of, or guaranteed by Huntington or any of its affiliates, and are not FDIC insured.

#### **Use of Online Surveys and Sweepstakes**

Online surveys and sweepstakes are offered from time to time on our Sites. Online surveys are used so that we can gather information to better serve you. Based on the information you provide to us, we may inform you of accounts and services from Huntington. You are not required to complete online surveys, sweepstakes or promotions. You should carefully review the rules of each sweepstakes or promotion in which you participate through our Sites, as they may contain additional important information about Huntington's use of Personal Information about you. To the extent that the terms and conditions of each sweepstakes or promotion concerning treatment of your Personal Information conflict with this Online Policy, the terms and conditions will control.

#### **Use of Online Planning Tools**

We make planning tools, such as mortgage and savings calculators available. We do not currently store information that you enter into one of these planning tools or calculators.