

## 1FFC Online Privacy Policy

This 1<sup>st</sup> Franklin Financial Corporation ("1FFC") privacy policy ("Privacy Policy") sets forth our policies and practices regarding information collected about you during your visits to our Web Site.

### Definitions

The term "Site" means any websites, including but not limited to, [www.1ffc.com](http://www.1ffc.com), interactive features, widgets, plug-ins, applications, content, downloads or other services maintained by 1FFC.

The terms "we," "us," "our," or "1FFC," means 1<sup>st</sup> Franklin Financial Corporation; and the terms "you" or "your" mean you as an individual person and, if you are an employee or representative of another person or entity, that entity or person.

### Application

As a supplement to this Online Privacy Policy, please review our posted Acceptable Use Policy which governs your use of our Site and our presence on other social media platforms. By continuing to use the Site (or any other 1FFC social media platform), you agree to the terms and conditions of this Online Privacy Policy and the terms and conditions of our Acceptable Use Policy. You further agree that we may collect, use, disclose, and store your information as described here. If you do not agree to the terms of this Online Privacy Policy or our Acceptable Use Policy, please do not provide us with any Personal Information and do not use this Site or any 1FFC social media platform.

This Online Privacy Policy does not apply to:

- Data we receive from third parties, unless we combine such data with Personal Information (defined below) that we have collected under this Online Privacy Policy;
- Our data collection activities offline or otherwise outside of our Site (unless otherwise stated below); or
- The data practices of third parties who interact or may interact with our Site or various social media platforms. This also includes any websites at which we advertise.

### Non-personal Information:

We may, along with any of our third-party service providers, use a variety of technologies that automatically store or collect certain non-personal information whenever you visit or interact with the Site ("Usage Information"). This Usage Information may be stored or accessed using tracking technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device ("Device" or "Devices") whenever you visit or interact with our Site. This Usage Information may include:

- Your IP address, UDID or other unique identifier (“Unique Identifier”). A Unique Identifier is a number that is automatically assigned to your Device used to access the Site, and our systems identify your Device by its Unique Identifier;
- Your Device and how it functions (including browser, operating system, hardware, and mobile network information);
- The areas within our Site that you visit and how you interact with each. This may include remembering your preferences, and the pages, screens, or other displays of information that you access;
- Your Device characteristics and location;
- Certain other Device data such as (but not limited to): the date, time of day, length of time of your visit(s), the frequency of your visits, and patterns of use;
- Domain name you use to access the Internet and other information obtained from Web page headers (i.e., type of Device and type and version of web browser);
- Information contained in or relating to any communication that you send to us or sent through the Site, including the content of the communication and metadata associated with it; and
- Internet address from which you linked to the Site.

### **Personal Information:**

On the Site, we may ask you to provide us or our service providers with information that identifies you personally (“Personal Information”) such as:

- Full name
- Date of birth
- Relationship status
- Home address and telephone number
- E-mail address
- Social security number
- Driver's license number
- Bank account and/or payment card information
- Employment information
- Information about your assets, debts and income
- Username
- Password

We may collect this information through various applications, uses, and forms and in various places throughout our Site.

Please see our [Privacy Notice](#), which we provide to all our customers, for a comprehensive explanation of how we collect, use and share Non-Public Personal

Information and what you can do to limit the use and sharing of your Non-Public Personal Information.

### **How Do We Use Collected Information?**

We and our service providers may use your information that is subject to this Online Privacy Policy:

- To process transactions such as your loan application;
- To underwrite your loan;
- To provide you with information such as to send you electronic newsletters or to provide you with special offers or promotional and marketing materials on behalf of us or third parties, including to let you know about new products, services or upcoming events;
- To verify your identity;
- To prevent fraud;
- To create your account;
- To communicate with you about your transactions, such as to provide customer support;
- To offer you products and services;
- To send monthly statements, service and collect amounts you owe;
- To enable you to participate in a variety of the Site's features such as to enable you to participate in online entry sweepstakes, contests or other promotions;
- To customize your experience on the Site or to serve you with specific content or ads that are relevant to you;
- To improve the Site, our marketing and our Site offerings;
- To tailor our Site to you and your preferences;
- For internal business purposes;
- For other purposes that are disclosed at the time you provide your information or otherwise set forth in this Online Privacy Policy; and
- To the extent necessary to enforce the Acceptable Use Policy.

### **What about Cookies and other Tracking Technologies?**

1FFC (or its online vendors) use tracking technologies, such as Cookies and Web Beacons, on our Site to collect and store Usage Information whenever you visit or interact with the Service. A "Cookie" is a small file containing alphanumeric characters that stores information about the user or records the user's browsing activity. Cookies are stored on your Device's hard drive. A "Web Beacon" is an electronic image (1x1 .gif) located within a certain web page that allows the Site to record the simple

actions of the user opening the page. Cookies, Web Beacons, and other tracking technologies may be active on our Site. We reserve the right to add or change our tracking technology as such technology improves.

We may send one or more tracking technologies to your Device when you visit the Site or allow ads to appear, including:

- To monitor your experience on the Site;
- To allow you to use and access the Site's functionality;
- To allow us to improve the Site to better serve our customers and other users;
- For identity verification and fraud prevention;
- To improve security on the Site;
- To analyze traffic and transactions on this Site;
- Keeping track of your specified preferences, including in terms of the presentation of content on our Site; and
- To market our products and services, including to deliver content, including content relevant to your interests on our Site and third party services based on how you interact with our content.

In addition to the list above, we may also work with data providers who may also collect data from you, such as your IP address and information about your browser or operating system. We may place a data provider's cookie which will be used to recognize your browser and enable you to receive customized ads or content. These cookies contain no personally identifiable information; they may contain or reflect demographic or other interest-based data in a de-identified form. The information in these cookies may be linked to data you voluntarily have submitted to us, such as your name, postal address or email, which we may share with a data provider in hashed or encrypted form. To opt-out of these data provider cookies, please go to the Digital Advertising Alliance ("DAA") website at <http://www.aboutads.info>.

1FFC also uses depersonalized aggregated Usage Information to assess and maximize the performance of the Site. This depersonalized Usage Information may be provided to other companies to assist us with these objectives, including, but not limited to, third party advertisers, analytics providers, and other service providers. Depersonalized Usage Information does not include any Personal Information that can be used to identify individuals.

Your browser should allow you to manage tracking technologies. However, if your browser's settings are too restrictive you may not be able to use all of the features of this Site.

In cases where you may enter this Site from a third party site, such as a search engine or referral site, those sites may use tracking technologies to monitor their own site performance, traffic, etc. You must review the privacy policy of each third party site in order to determine what information about you is collected and how that information is used.

## **What about Our Interactions with Third-Party Services?**

The Site may include functionality that allows certain kinds of interactions between the Site and a third-party web site or application. The use of this feature may involve a third-party operator providing certain information, including Personal Information, to us. For example, if you click on social media icons on the Site (such as for Facebook, Twitter or Instagram), such action may be associated with your Personal Information you provided on those third-party sites or applications, and we may then have access to that Personal Information. If so, we will then treat it as Personal Information under this Online Privacy Policy. In addition, we may provide third-party sites' interfaces or links on the Site to facilitate your ability to send communications from the Site. For example, we may use third parties to facilitate emails, tweets or Facebook postings. These third parties may retain any information used or provided in any such communications or other activities. Such third parties' practices are not subject to our Online Privacy Policy. We may not control or have access to your communications through third parties. Further, when you use third-party sites or services, you are using their services and not ours. Therefore, the third party, not us, would then be responsible for their practices. You should review the applicable third-party privacy policies before using such third-party tools on our Site.

## **What about Advertising?**

Data about your activities online is being collected on our Site for use in providing advertising tailored to your individual interests. We may use third parties such as network advertisers and ad exchanges to serve advertisements across the Internet and may use third party analytics service providers to evaluate and provide us and/or third parties with information about the use of these ads on third party websites and viewing of ads and of our content. Third parties may offer you a choice as to whether or not to have your information collected for that purpose. This section of our Online Privacy Policy provides details and explains how you can exercise that choice.

You may see certain ads on other third-party websites and services across the Internet because we participate in advertising networks administered by third parties. These networks track your online activities over time and across third party websites by collecting information through automated means, including through the use of the tracking technologies described above. They may use this information to show you advertisements (including our ads) that are tailored to your individual interests. The information they collect includes information about your visits to our Site, such as the pages you have viewed. These third-party tracking technologies may be set to: (1) help deliver advertisements to you that you might be interested in; (2) prevent you from seeing the same advertisements too many times; and (3) understand whether you find the advertisements that have been delivered to you useful. You acknowledge and agree that associated technology may access and use your Device and may set or change settings on your Device in connection with the associated operations.

This collection and ad targeting takes place both on our Site and on third-party websites that participate in the ad network, such as websites that feature advertisements delivered by the ad network. This process also helps us track the

effectiveness of our marketing efforts. For example, third-party service providers, including Google, may show you our ads on the Internet. Third party vendors, including Google, use tracking technologies to serve ads after a user visits our Site. You may opt out of Google's use of cookies by visiting the Google advertising opt-out page at: <https://www.google.com/settings/u/0/ads/authenticated?hl=en> . We are not responsible for the effectiveness of or compliance with any third parties' opt-out options, including Google's opt-out option

### **How does 1FFC share information collected online?**

We may share non-personal information, such as aggregated user statistics, with third parties. We may share your Device Identifiers with third parties along with data related to you and your activities. Please refer to our [Privacy Notice](#), which explains what Personal Information we may share with third parties. In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below or otherwise in this Online Privacy Policy. We may disclose your information, including Personal Information, as follows:

- For any purpose to which you expressly consent;
- To protect or enforce our rights or the rights or safety of others;
- As permitted or required by applicable law, regulation, subpoenas, governmental requests or legal process;
- In association with a merger, acquisition, restructuring, asset transfer, or other operational or corporate changes to our company, including during the course of any due diligence process;
- For joint marketing with other companies;
- To our third party service providers who may only use shared information in accordance with this Online Privacy Policy and only provide the services we request. We may use third-party service providers to perform certain services on behalf of us or the Site, such as: (1) to assist us in the operation of our Site; (2) to process any transaction you request (if any) and to maintain any online account you have with us; (3) to manage a database of customer information; (4) hosting the Site; (5) designing or operating the features available on the Site; (6) tracking the activities and analytics of our Site; (7) enabling us to send you special offers or perform other administrative services; and (8) other services designed to assist us in maximizing our business potential. We may provide these service providers with access to user information, including Unique Identifiers and Personal Information, to enable them to carry out the services they are performing for us.

### **Can I confirm that the information 1FFC collects is correct or make changes to my information?**

Keeping your online account information accurate and up to date is important. You may request access to the Personal Information 1FFC maintains about you, or you may ask questions or raise issues with the accuracy of your Personal Information by

contacting us at: 1-800-700-7943, 1<sup>st</sup> Franklin Financial Corporation, PO Box 880 Toccoa, GA 30577. In the event that you contact us and raise an issue, we will promptly investigate your concerns, respond to you and update our records as needed. We request that you keep your information as up to date as possible so that you may get the maximum benefit from us and your use of our online services. You can make changes by logging into account management on the Site. In particular, please make sure that you inform us of e-mail address changes you experience. When you edit your Personal Information or change your preferences on the Site, information that you remove may persist internally for our administrative purposes.

### **What about Email and Text Messaging?**

You may cancel or modify our e-mail marketing communications you receive from us by following the instructions contained within our promotional e-mails. This will not affect subsequent subscriptions and if your opt-out is limited to certain types of e-mails the opt-out will be so limited. If you subscribe to text messages from us, you can terminate a particular text message subscription by reply texting "STOP." Subsequent or different subscriptions will be unaffected. Please note that we reserve the right to send you certain communications relating to your account or use of our Site, such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt-out from receiving our marketing communications.

### **How is information collected on this Site protected?**

1FFC endeavors to incorporate commercially reasonable physical, electronic, and procedural safeguards to help protect and secure your Personal Information. We maintain Personal Information in secure computer systems and we limit the employees' access to those with a business reason to see it. More specifically, employees may access information about you when needed to maintain your accounts or otherwise meet your needs. Our employees are trained to understand and comply with our security safeguards. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure.

### **Am I protected when linking from the Site to other sites?**

This Online Privacy Policy is for customers and visitors, and only applies to this Site. This Site only includes its home page and affiliated pages operated and maintained by 1FFC or its online vendors. As noted previously, this Online Privacy Policy does not apply to any linked site or any site provided by a third party.

### **Do We Collect Information about Children?**

We are a general audience site and we do not knowingly collect, maintain, or use Personal Information on our Site about children under the age 13 that requires parental notice and consent under the Children's Online Privacy Protection Act ("COPPA"). If you are a child under 13 years of age, you are not permitted to use the Site and should not send any information about yourself to us through the Site.

If we become aware that we have collected personal information from any child, we will dispose of that information in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of 13 has provided us with Personal Information without COPPA-required consent, please contact us using the contact information provided below.

### **What about Transfer of Information to the United States?**

Our Site is operated in the United States and intended for users located in the United States. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Site or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Online Privacy Policy.

### **What about Changes to this Online Privacy Policy?**

From time to time, we may change this Online Privacy Policy. If we do, we will post the changed Online Privacy Policy on the Site. The effective date of this Online Privacy Policy, as stated below, indicates the last time this Online Privacy Policy was revised or materially changed. Checking the effective date below allows you to determine whether there have been changes since the last time you reviewed this Online Privacy Policy.

**This Online Privacy Policy is effective as of: August 1, 2017**

**This Online Privacy Policy is provided to you for informational purposes only. You do not need to call or take any action in response to this notice. We recommend that you read and retain this notice for your personal files.**

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