

PRIVACY POLICY

Last Updated on February 13, 2024

Introduction and Scope

This Privacy Policy (“**Privacy Policy**”) describes how SouthEast Bank and its affiliates, divisions, subsidiaries, holding companies, and any subsidiaries of those holding companies (collectively “**SouthEast Bank**”, “**we**”, “**us**”, or “**our**”) collect, use, process, and/or disclose your information when you visit our Sites, use our services, or otherwise engage with us as described below. We respect your privacy, believe in transparency, and are committed to protecting your information. Please read this Privacy Policy carefully to understand how we handle your personal information.

This Privacy Policy applies to information we collect through:

- Our “**Sites**” which refers to www.southeastbank.com, www.elfi.com, or any other of our websites, mobile applications, platforms, and other online solutions, software applications, media, features, subdomains, content, and/or functionality made available by us containing a link to this Privacy Policy.
- Any e-mails, text messages, and other electronic messages between you and our Sites.
- Your interaction with our advertising and applications on third-party websites and services if those applications and advertising include links to our Sites.
- Our general interactions with you, including, when you request information or make general inquiries with us, interact with us, request or receive our marketing information, or engage with us through our social media pages.

This Privacy Policy does not apply to:

- Information collected by us that does not link to this Privacy Policy;
- Information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or our Sites;
- Any information subject to the [SouthEast Bank Consumer Privacy Disclosure](#).

If you have a financial product or service with us, we will use and share your personal information in accordance with the privacy notice that applies to your account. However, this Privacy Policy may still be useful to you in describing our online services and the options and choices described below are available to you as well.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with the terms of this Privacy Policy, you should not use our Sites, services, or otherwise interact with us. By accessing,

visiting, browsing, or using our Sites, registering or submitting your information through our services, or interacting with us, you agree to the practices, terms, and conditions described in this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of our Sites after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

The Sites are intended for users located in the United States and are not intended for users located in any other countries, including the European Union and the European Economic Area.

Information We May Collect

The information we collect depends upon things such as the nature of our relationship, the method you communicate with us, and the purpose of your interaction with us. We may collect the following information directly from you, from third-party sources, and automatically as you use our Sites:

- **Contact Information:** Such as your name, email address, mailing address, telephone number, professional title, and/or business name
- **Registration Information:** Such as your username, email address, and/or password to login to an online account with us.
- **General Identification Information:** Such as your name, date of birth, gender, and marital status.
- **Government Issued Identifiers:** Such as your Social Security number, tax identification number, driver's license number, or other identification numbers issued by government bodies or agencies.
- **Financial Information:** Such as your bank account numbers, credit card numbers, details of transactions you effectuate, and creditworthiness.
- **Communications Data:** Such as information you provide through our online web forms when you contact us with questions, feedback, surveys, engage with us for customer support or customer service-related requests, or otherwise choose to provide to us when you correspond with us online.
- **Usage Data:** Such as information about how you use our Sites and interact with us, including information you provide when you use any interactive features of the Sites or our services, the URL that referred to you our Sites, the areas within our Sites that you viewed and your activities there, domain name, a date/time stamp, Internet service provider (ISP), operating system, IP address, clickstream data, and similar device and usage information.
- **Device Information:** Such as information that is automatically assigned to your devices used to access our Sites, including IP address, unique device identifier, device type, browser type, location information, and other information about your browser.

- **Social Media Information:** Such as your name, username, or other profile information in connection with your social media account that we may collect if you connect with us through a third-party social media network or other websites, such as Facebook, Instagram, Twitter, or LinkedIn.
- Other information that you voluntarily share with us to facilitate your use of our Sites and services which is not specifically listed here. We will use such data in accordance with this Privacy Policy, as otherwise disclosed at the time of collection, in accordance with our agreement, or to the extent necessary for performing the services.

We may also collect information about you from additional online and offline sources, including our affiliates, credit reporting agencies, and other third-party sources as permitted by law.

The entry of personal information is required to access certain portions of our Sites and services. You may choose not to provide us with any personal information and may still access certain portions of our Sites. However, you may not be able to fully utilize all functionalities and features of our Sites and services if certain categories of personal information are required in order for us to deliver those functionalities.

How We May Use Your Information

To the extent permitted by applicable law, we may use information that we collect about you or that you provide to us, including any personal information for the following purposes:

- **Provide Our Products and Services**, which includes, to present, maintain, and/or modify our Sites and its contents to you, to perform our contractual obligations to our customers, to complete the transaction for which we collected the personal information, to verify your identity, process applications and transactions, communicate with you about our products and services, use the location of your mobile device for location-based services you request, or otherwise provide you with our services
- **Personalized Support and Services**, which includes to communicate with you about events, promotions, and campaigns, manage your preferences to provide a more personalized experience to you.
- **Security and Fraud Prevention**, which includes to protect, investigate, mitigate, and deter against fraudulent, malicious, unauthorized, infringing, or illegal activity relating to our Sites, services, assets, products, or to monitor and ensure the safety and security of our premises, property, employees, customers, and visitors.
- **Advertising and Marketing**, which includes direct marketing and promotional purposes, posting ads through our third-party websites or mobile applications that may be of interest to you, contacting you with advertisements, promotions, or offers that may be of interest to you (as permitted by law and consistent with any marketing preferences that we offer and you have registered with us)

- **Manage our Business Operations**, which includes to facilitate and service our business, including the creation of new products or services, conduct data analytics, surveys, benchmarking, and create aggregated data and developing industry and sector-wide reports, to better understand our customers, website visitors, and mobile application users, improve our online services, and otherwise facilitate the operation of our Sites and mobile applications.
- **Legal Requirements**, which includes to enforce our terms and conditions or protect our business or our customers, and to comply with our contractual and legal obligations, such as complying with national security or law enforcement requirements, discovery requests, or where otherwise required or permitted by applicable laws, court orders or regulatory authorities, or to establish, exercise, or defend legal claims, whether in court, administrative, or other proceedings, including disputing a claim or recovering a debt.
- As otherwise set forth in this Privacy Policy, to fulfill the purpose or reason you provided the information, and/or with your consent such as when required by law.

How We May Disclose Your Information

When permitted by applicable law, including in cases that require your consent, we may disclose personal information that we collect or you provide as described in this Privacy Policy to our affiliates, business partners, service providers, and others, as follows:

- **Corporate Affiliates**, which include, our subsidiaries, divisions, affiliates, and holding companies for various purposes permitted by law, including the advertising and marketing of their products and services to you.
- **Service Providers**, which include contractors, service providers and other third parties we use to support our business and deliver products or services to you, and/or who perform functions on our behalf such as customer service, data analysis, servicing accounts, marketing, and/or development of our products and services, and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- **Acquisitions or Similar Transactions**, which include to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us is among the assets transferred.
- **With Your Consent or at Your Direction**, which includes to third parties to market their products or services to you if you have consented to these disclosures or where you have consented to the disclosure of your information to other unaffiliated third parties who are not described elsewhere in this Privacy Policy.
- **In Response to Legal Process or Defending Legal Claims**, which includes, as required by law, court orders, subpoena, or other legal process or if we reasonably believe such

action is necessary to comply with the law and the reasonable requests of regulators, law enforcement, or other public authorities or quasi-government authorities, including fraud detection agencies. We may also disclose the information to establish, protect, or exercise our legal rights, to enforce our terms and conditions or other legal agreements, to defend against a legal claim, to detect, investigate, prevent, or take action against illegal activities or potential threats to the rights, property, or safety of any other person, or as required by law.

- **Professional Advisors**, which includes our attorneys, accountants, tax advisors, investment advisors, and other fiduciaries or consultants that need access to your information to provide operational or other support on your behalf.
- **De-Identified or Aggregated Data**. We may disclose anonymous, de-identified, or aggregated data about our users that does not identify any specific individual, such as groupings of demographic data or customer preferences.

Cookies and Similar Technologies

Cookies

A “cookie” is a small file that is accessible within a folder on a computer and it is used for record-keeping purposes. “Session” cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session. “Persistent” or “permanent” cookies remain stored on your hard drive until they expire or are deleted by you. Local stored objects (or “flash” cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you’re visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website. You can block and control cookies using the information noted below. If you block all cookies, certain functionalities on our Sites or services may not work.

- **Essential Cookies:** Essential cookies and other similar technologies used by us enable you to navigate our Sites and use our services and their features. Without these essential cookies, the Sites will not perform correctly, and we may not be able to provide the Sites to you or provide you with certain services or features of our Sites.
- **Functionality/Preference Cookies:** Functionality cookies (or preference cookies) and other similar technologies allow our services to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of our services after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.
- **Performance Cookies:** These cookies and other similar technologies collect information about how you use our services, including which pages you go to most

often and if they receive error messages from certain pages. These include cookies from third-party analytics services as long as the cookies are for the exclusive use of the owner of the website visited. These cookies are only used to improve the functions of our Sites and how they perform.

- **Advertising Cookies:** Advertising cookies and other similar technologies are used by us to display promotions or advertisements based on your use of the Sites and interests and to manage our use of advertising resources. These cookies collect information about your activities on our Sites to provide you with interest-based advertising. WE may also allow our third party business partners to use targeting and or advertising cookies on our Sites for similar purposes, including collecting information about your online activities over time and across different websites. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt-out of receiving targeted ads from members of the National Advertising Initiative ("NAI") on its website (www.networkadvertising.org).

Other Similar Technologies

In addition to cookies, there are other automatic data collection technologies, such as Internet tags, web beacons (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.), HTML Local Storage, Social Widgets, or UTM Codes that can be used to collect data as users navigate through and interact with a website.

- **Web Beacons:** Web beacons, also known as pixel tags or clear GIFs, are small strings of code that enable delivery of a graphic image on a webpage for the purpose of transferring data, such as the IP (Internet Protocol) address of the computer that downloaded the page on which the Web beacon appears, the URL (Uniform Resource Locator) of the page on which the Web beacon appears, the time the page containing the Web beacon was viewed, the types of browser that fetched the Web beacon and the identification number of any cookie on the computer previously placed by that server. Web beacons and similar technologies let us know whether you accessed or opened our email or that certain content was viewed or clicked.
- **Tracking Pixels:** A tracking pixel is a small piece of code we may use to collect and share information on your usage of our website, such as the pages that you have visited, or the way you have interacted with them. Through the tracking pixels, your browser automatically establishes a connection with the server of an online advertiser. In this way, the online advertiser receives information that you access our Sites. This can allow us to ensure that we are serving ads that match your interests, when you are visiting any of the websites of the online advertiser, or a website that includes ads served by the online advertiser. If you are authenticated to an online advertiser using tracking pixels, e.g. by being registered and logged in to a social network, the online advertiser can assign the visit to our website to your account. The data we may collect through tracking pixels is anonymous and does not include any personal information of individual users. We have

no influence on the extent to which the data collected through the tracking pixels is used by the online advertisers and therefore direct you to their privacy notices.

- **Social Widgets:** These are buttons or icons provided by third-party social media platforms that allow you to interact with social media services when you view a webpage or mobile app screen. These social widgets may collect browsing data, which may be received by the third party that provided the widget and are controlled by third parties.
- **UTM Codes:** These are strings that can appear in a URL (the “Uniform Resource Locator,” which is typically the http or https address entered to go to a webpage) when you move from one web page or website to another. The string can represent information about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

Particular third-party cookies or tracking technologies used on our Sites include, but are not limited to:

- **Google Analytics:** We use Google Analytics to collect and process data about the number of people using the Sites and to better understand how they find and use the Sites. The data collected includes data related to your device/browser, your IP address, and on-site activities to measure and report statistics about user interactions on the Sites. The information stored is reduced to a random identifier. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Any data collected is used in accordance with this Policy and Google’s privacy policy. You may learn more about Google Analytics by visiting:

<https://www.google.com/policies/privacy/partners/> and
<https://support.google.com/analytics/answer/6004245>

You can learn more about Google’s restrictions on data use by visiting the Google Privacy Policy at: <https://www.google.com/policies/privacy>. To opt-out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> and install the opt-out browser add-on feature. For more details, visit the “Google Analytics opt-out browser add-on” page (located at <https://support.google.com/analytics/answer/181881?hl=en>).

- **Google Marketing:** We use Google’s marketing technologies to track user activity on the Website and to provide personalized advertisements. Your browser is assigned a pseudonymous ID to track the ads that have been served to your browser and to identify those on which you’ve clicked. The cookies enable Google and its partners to select and display ads based on your browsing behavior. For more information on how Google uses this information, you can visit:

<https://policies.google.com/technologies/ads>
<https://support.google.com/displayvideo/answer/7621162> and
<https://support.google.com/google-ads/answer/7548399?hl=en>

To block certain ads served by Google, please visit:
<https://support.google.com/ads/answer/2662922>.

Google's Privacy Policy is available at: <https://www.google.com/policies/privacy>.

- **Facebook Pixel.** We use Facebook Pixel to customize and display advertisements only to Facebook users who have shown an interest in our Sites or who have specific characteristics (e.g., certain demographics or interests in certain topics or products determined by websites visited) that we submit to Facebook. The use of Facebook Pixel helps ensure that our advertisements are in line with the potential interests of users and do not have a nuisance effect. Facebook Pixel also allows us to track the effectiveness of Facebook advertisements for statistical and market research purposes by seeing whether users have been redirected to our Sites after clicking on a Facebook advertisement. The Facebook Pixel is directly integrated into our Website by Facebook and can store a cookie on your device. The information collected about you is anonymous for us. However, the information collected via the Facebook Pixel, on the Sites as well as other websites on which Facebook Pixel is installed, is also stored and processed by Facebook. Facebook may link this information to your Facebook account and also use it for its own promotional purposes in accordance with Facebook's Data Usage Policy.
- **LinkedIn Pixel.** We use LinkedIn Marketing Solutions Pixel (also known as the LinkedIn InsightTag) which is a snippet of Javascript code implemented on our Website to track page views and conversions and to provide insight into post-click and view-through conversions of our ad campaigns on LinkedIn. LinkedIn collects information relating to your visit to our Website, including referring address, IP address, device, and browser characteristics. LinkedIn does not share this information with us and only provides us with aggregated reports and alerts about the Website visitors and ad performance. However, LinkedIn may use this information to serve you ads elsewhere. For more information on how LinkedIn uses this information, see their privacy notice. LinkedIn members can control the use of their information for advertising purposes through their LinkedIn account settings.

We do not control these third parties' technologies or website or how they may use your personal data once you are referred to these third-party websites. If you have any questions, you should contact the responsible party directly or consult their privacy policies.

Choices About Cookies

Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website tracking technologies and advertising. You may adjust your browser settings to opt out of accepting a "persistent" cookie and to only accept "session" cookies, but you will need to log in each time you want to enjoy the full functionality of the Sites.

If you decline the use of cookies, you may not have access to the full benefits of the services. Further, your opt-out only applies to the web browser you use, so you must opt out of each web browser on each computer you use. Once you opt out, if you delete your browser's saved cookies, you will need to opt out again. In addition, adjusting the cookie settings on the services may not fully delete all of the cookies that have already been created. To delete them, visit your web browser settings after you have changed your cookie settings on the services.

Additional information is provided below about how to disable cookies or manage the cookie settings for some of the leading web browsers (PLEASE NOTE: these third party links are provide for your convenience, and we may not actively monitor the content of these links):

Google Chrome	https://support.google.com/chrome/answer/95647?hl=en
Firefox	https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
Internet Explorer	http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies
Microsoft Edge	https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09
Safari; iOS	https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac and https://support.apple.com/en-us/HT201265
Adobe Flash Cookie	https://www.macromedia.com/support/documentation/en/flashplayer/help/help09.html

For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>.

Your Choices to Control Your Information

Please use the “Contact Us” details provided at the end of this Policy to exercise your rights and choices under this Privacy Policy. We honor such requests when we are required to do so under applicable law.

Email Opt-Out: If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link at the bottom of our emails or by contacting us at marketing@southeastbank.com and providing your name and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take

corrective action. Please note that registered users on the Sites cannot opt-out of receiving transaction emails related to their account.

Online Tracking Signals: We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions. “Do Not Track” is a web browser setting that seeks to disable the tracking of individual users’ browsing activities. We adhere to the settings in this Privacy Policy

Accuracy and Updating Your Information: Our goal is to keep your information accurate, current, and complete. You may send us an e-mail via the “Contact Us” details at the end of this Privacy Policy to, correct or update any personal information that you have provided to us. For instance, if your email address changes, you may wish to let us know so that we can communicate with you. If you become aware of inaccurate personal information about you, you may want to update your information. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We are not responsible for any losses arising from inaccurate, inauthentic, deficient, or incomplete personal data that you provide to us.

Data Retention

We retain and use your personal information for an appropriate period of time as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, to pursue legitimate business purposes, to enforce our agreements, and other business or commercial purposes to the extent provided in this Privacy Policy.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, or (3) if you ask us to delete your personal information, *unless* we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives. When we delete your personal information, it will be removed from our active servers and databases; but it may remain in our archives when it is not practical or possible to delete it.

Data Security

We recognize the importance of safeguarding your personal information. We endeavor to maintain reasonable and appropriate physical, technical, and organizational safeguards designed to protect your personal information from accidental loss and unauthorized access, use, alteration, or disclosure. From time to time, we review our security procedures to consider appropriate new technologies and methods. We use reasonable security measures when transmitting personal information to customers in responding to requests under applicable data protection or privacy laws.

While our security measures seek to protect the personal information in our possession, no security system is perfect, and no data transmission is 100% secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to or from our Sites. The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of our Sites or our services, you are reasonable for keeping your password confidential. Do not share your password with anyone. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

SMS Text Communications

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

- Message frequency varies per user.
- Message and data rates may apply.
- Text HELP for help. Text STOP to unsubscribe.
- Carriers are not liable for delayed or undelivered messages

Links to Third-Party Websites

This Policy does not apply to any third-party websites or applications.

Our Sites may contain links to websites or mobile applications operated and maintained by third parties. These links are to external websites and third parties that have their own privacy policies. If you follow any links that direct you away from the Sites or services, including links to social media sites or to other websites, this Privacy Policy will not apply to your activity on the other sites you visit. Because of the dynamic media capabilities of the Sites, it may not be clear to you which links are to the Platform and which are to external, third party websites. If you click on an embedded third-party link, you will be redirected away from the Sites to the external third-party website. You can check the URL to confirm that you have left the Sites.

We cannot (i) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites, (ii) control the privacy policies or the privacy practices of any third parties regarding their independent collection or use of your personal information, or (iii) endorse any third-party information, products, services or websites that may be reached through embedded links on the Sites.

Any personal information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms of use. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit the Privacy Notice for California Residents here: <https://www.southeastbank.com/wp-content/uploads/2024/02/SEB-ELFI-CPRA-Consumer-Privacy-Notice.pdf>

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits California residents who are users of our Sites to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us via the Contact Us link and we will honor such requests where they may apply.

Children’s Privacy

Our Sites are not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Sites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Sites or on or through any of its features/register on the Sites, make any purchases through the Sites, use any of the interactive or public comment features of the Sites or provide any information about yourself to us. If we learn that we have collected personal information from any person under the age of 13 without verification of parental or guardian consent, we will delete that information as quickly as possible. If you are a parent or guardian of a child under 13 years of age and believe your child has provided us with personal information, please contact us via the instructions at the “Contact Us” section below.

Changes to Our Privacy Policy

We reserve the right to add to, change, update, or modify this Privacy Policy at any time to reflect any changes to how we treat your information or in response to changes in law. In the event we make changes to this Privacy Policy, such policy will be re-posted on this page. If we make material changes to how we treat our users’ personal information, we may notify you by e-mail to the e-mail address specified in your account and/or through a notice on the Website home page. The date the Privacy Policy was last revised is identified at the top of the page. All changes are effective on the date listed at the top of this page and will apply to all information we have about you.

You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Sites and this Privacy Policy to check for any changes. Your continued use of the Sites and our services after the “Last Updated” date indicates your acceptance of the changes and your continued consent to our processing of your personal information according to the terms of the then-current Privacy Policy. If at any point you do not agree to any portion of this Privacy Policy, then you should immediately stop using the Sites and the services.

Contact Information

For more information, or if you have any questions or comments about this Privacy Policy and our privacy practices, you may contact us using the information below.

In Writing: SouthEast Bank
12700 Kingston Pike
Farragut, TN 37934

By Email: contactcenter@southeastbank.com

By Telephone: 1-844-732-2657