

Online Privacy and Security Policy

Last Updated: 10/28/2024

Introduction:

This Online Privacy Policy (the "Policy") applies to the financial services and products provided by Heritage Bank of the Ozarks. Trust has always been the foundation of our relationship with customers. We recognize that you trust us with your personal and financial information.

The Policy describes the treatment of information that is provided by you or collected through any of our online interfaces to which a copy of the Policy is posted, including (the "Website"), Applications we have placed on third party sites such as Facebook®, X® and other social media services, and Heritage Bank of the Ozarks' mobile applications (the "Applications," and together with the "Website," the "Services"). It also explains how we collect, use and share information based on users' interactions with online advertisements, both on the Services and on online interfaces owned by third parties. Note that the Policy does not govern our privacy practices offline or with respect to information that is not provided or collected through the Services.

We will use and share any information that we collect from or about our customers in accordance with the Policy, which provides choices regarding our sharing and use of information. For additional information on this Policy or our privacy practices generally, please feel free to contact the bank directly at 417-532-2265.

While this Online Privacy Policy describes how we treat information, please be aware that additional terms and conditions may apply for certain parts of our Website and Applications, such as our Privacy Policy. [https://www.heritagebankozarks.com/_/kcms-doc/445/4223/Privacy-Policy.pdf]

Types of Information We Collect:

We collect two basic types of information through the Services – personal information and anonymous information. We also collect location information in connection with our mobile applications.

"Personal information" refers to information that identifies (whether directly or indirectly) a particular individual, such as information you provide on our forms, surveys, applications or similar online fields. Examples may include your name, postal address, email address, telephone number, Social Security number, date of birth or account information.

"Anonymous information" means information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples may include information about your Internet browser, information collected through tracking technologies (see "Online Tracking and Advertising" for additional information regarding our use of tracking technologies), demographic information that you provide to us (e.g., your household income) and aggregated or de-identified data.

"Location information" means information that may be collected by certain mobile applications that identifies your physical location.

How We Collect Your Information:

We collect personal information from you or about you when you provide this information to us directly. For example, we may obtain personal information when you request information, products or services from us, register on the Website or an Application, respond to surveys, contact customer support or otherwise interact with us. We may also receive information about you from other online and offline sources, such as public databases, social media platforms and other third parties.

In addition, we may collect information about your activity on the Services automatically using tracking technologies, such as cookies, and pixel tags. Definitions for the tracking technologies we use, as well as information regarding how to disable them, are available in this Policy.

If you submit any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

How We Use Information That We Collect:

We may use information that we collect in order to, among other things:

- Provide you with, or evaluate your eligibility for, products and services that you request from us
- Communicate with you about your accounts or transactions with us
- Send you important information regarding the Services, changes to this Policy and/or other similar administrative information
- Allow you to participate in surveys, sweepstakes, contests and similar promotions, and to administer such promotions (note that these promotions may contain additional disclosures regarding our collection and/or use of your information)
- Consistent with local law, required disclosures, and choices and controls that may be available to you:
 - Send you offers and promotions for our products and services, or products and services that may be of interest to you;
 - Personalize content and experiences on the Services;
 - Verify your identity and/or location (or the identity or location of your authorized representative) for security, fraud prevention and other risk control purposes; and
 - Provide you with advertising based on your activity on the Services and on third-party websites and applications. For additional information regarding our use of your information for personalization and tracking, see below for more information.
- Optimize or improve our products and services
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Comply with our legal and regulatory obligations
- Enforce our terms and conditions and otherwise protect our rights and operations

How We Share Information That We Collect

We will not share your information outside the Heritage Bank of the Ozarks family of financial service providers, except under limited circumstances, as required by law and with our advertising partners, as described below.

Online Tracking and Advertising

We and certain trusted service providers operating on our behalf collect information about your activity on the Services using tracking technologies, including:

Cookies. Cookies are pieces of information that are stored directly on the device that you are using. They allow us to collect information such as the type of browser you are using, the amount of time you spend using the Services, the websites or applications you visit and the preferences you have set up for your accounts. We use this information for such purposes as to personalize your experience, enhance security, facilitate navigation, display material more efficiently, recognize the device that you are using to access the Services and understand how the Services are used. The Services do not use cookies that capture unencrypted personal information about you.

You can choose to have your device refuse to accept any cookies, and the majority of devices and browsers offer additional privacy settings for cookies. You do this through your browser settings. Each device and each browser is a little different, so look at your device Settings or your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you will not have access to many features that make your user experience more efficient and some of the Services will not function properly. Please note that you will need to manage your cookie settings for each device and browser that you use.

Pixel tags, web beacons, clear GIFs and other similar technologies. These are typically small pieces of data that are embedded in images on the Website, our products, services, or certain email communications. They may involve the transmission of information directly to us, to another party on our behalf or to another party in accordance with its privacy policy. We may use these technologies to bring together information we collect about you.

Location tracking on mobile devices. Certain applications on mobile devices may transmit information to us about your location and includes your physical location when you search for a nearby ATM using your mobile device. We may use that information to improve the products and services we provide to you as well as improving our services generally in your area.

Information collected through tracking technologies is used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you use or return to the Services
- Deliver relevant content based on your preferences, usage patterns and location
- Monitor and evaluate the use and operation of the Services
- Analyze traffic on the Services and on websites or mobile applications of third parties

Other technologies. We may use other technologies, such as the capture of screenshots while you are using the Services, to understand how you navigate and use the Services. This information helps us to better understand how the Services are used and to improve them.

We may associate this tracking data with any personal information you provide, in which case we will treat it as personal information.

Do Not Track. There is no industry standard for how Do Not Track consumer browser settings should work on commercial websites. Due to the lack of such standards our websites do not respond to Do Not Track consumer browser settings.

We use trusted service providers, such as advertising and media companies to collect information about use of the Services anonymously and report website trends, without identifying individual visitors. Those third parties use cookies and other similar technologies.

Advertising and Banners. Occasionally, you may encounter banner advertisements for our products and services on third-party websites and mobile applications. We use third-party advertising service providers to distribute our advertisements on websites and mobile applications where we have paid to advertise. These advertisements may use tracking technologies to capture information such as IP address, browser type and usage information in order to track the effectiveness of our advertising efforts. We may associate the information collected by these technologies with your identity. Our advertising service providers are prohibited from using any information collected except to track advertising effectiveness.

In addition, we use advertising service providers to place advertisements for our accounts and services on websites not affiliated with us, and to help us determine which of our advertisements are most likely to be of interest to you using non-personal behavioral information. Advertisements placed by these service providers may use tracking technologies that allow monitoring of your responsiveness to such advertisements. We restrict access and collection of information by advertising service providers for purposes other than assisting us with our advertising efforts.

For behavioral advertising opt-outs to work on your device, your browser must be set to accept cookies. If you delete cookies, buy a new device, access the Services from a different device, log in under a different screen name or change web browsers, you will need to opt out again. If your browser has scripting disabled, you do not need to opt out, as online behavioral advertising technology does not work when scripting is disabled. Please check your browser's security settings to validate whether scripting is active or disabled.

Other Information Collected Automatically

Browser or Device Information: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the Services (such as the Application) you are using. We use this information to ensure that the Services function properly.

Application Information: When you download and use a product or service, we and our service providers may track and collect usage data, such as the date and time the Application on your

device accesses our servers and what information and files have been downloaded to the Application based on your device number.

IP Address: Your IP address is a number that is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, helping diagnose server problems, administering the Services, for analytics purposes, and to deliver personalized advertisements. For advertising and analytics purposes, we may share your IP address with third-party advertising partners.

Linked Websites

Some of our products and services may contain links to third-party websites not controlled by Heritage Bank of the Ozarks. We encourage you to be aware when you leave our product or service and to read the privacy policies and terms of use of any such websites that may collect your personal information, as they will likely differ from our policy. Heritage Bank of the Ozarks does not guarantee and is not responsible for the privacy or security of these websites, including the accuracy, completeness or reliability of their information.

In addition, Heritage Bank of the Ozarks is not responsible for the information collection, use and disclosure practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft or any other app developer or provider, social media platform provider, operating system provider, wireless service provider or device manufacturer.

Data Security

Your privacy is very important to Heritage Bank of the Ozarks and we are committed to protecting your personal information from unauthorized access or use. We will use reasonable organizational, physical, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us at 417-532-2265.

In addition, Heritage Bank of the Ozarks protects customers from liability for unauthorized online transactions. Certain conditions and limitations may apply. See the Unauthorized Transfers section in your Electronic Fund Transfers Agreement. [Note: These liability rules are established by Regulation E, which implements the federal Electronic Fund Transfer Act and does not apply to business accounts.]

Preventing Identity Theft

To help us protect your personal information, it is important that you always keep your account information safe. We recommend that you consider the risk of sharing your username, password, or PIN with anyone.

Importantly, Heritage Bank of the Ozarks will never initiate (unless otherwise stated for a specific product or service application), a request via email for your sensitive information (e.g., Social

Security number, username, password, PIN or account number). If you receive an email asking for your sensitive information, you should be suspicious of the request and promptly to report the suspicious activity to us at 417-532-2265.

Please be aware, however, that in certain telephone and in-person transactions we may ask for your full Social Security number, account number or other information to verify your identity before conducting the transactions you have requested. For example, we may ask for such information to verify your identity when you place a call to us, when you visit a Heritage Bank of the Ozarks branch office or when we call you about a new product or service, we believe that you will find valuable. We will never request that you disclose your personal ID, password or PIN under any circumstances, including telephone or in-person transactions.

Additional information regarding identity theft and the steps you can take to help protect yourself from fraud can be found at the following websites:

<https://www.banksneveraskthat.com/>

<https://www.heritagebankozarks.com/security-policy.html>

<https://www.aba.com/advocacy/community-programs/consumer-resources/protect-your-money/protecting-your-identity>

Children's Privacy

We do not use the products and services to knowingly solicit personal information from or market to children under the age of thirteen (13) without parental consent. We request that such individuals do not provide personal information through our products. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly notify us and we will delete such information from our files. For additional information regarding the Children's Online Privacy Protection Act (COPPA), please visit the FTC's website below:

<https://www.ftc.gov/business-guidance/privacy-security/childrens-privacy>

External Aggregation Services

You have the responsibility to help us protect your accounts. Consider the risk of revealing your username, password, or other credentials to any person or third party. By providing your username, password or other credentials to any person or third party (including an aggregation service) you authorize that person or third party to initiate transfers to or from your account.

Some third-party companies offer aggregation services that allow you to consolidate your financial account information from a variety of sources, such that you can view all your account information at a single online location. For example, an aggregation service might collect and consolidate your checking and savings account balances at your bank, the value of your stocks and bonds in your brokerage account and your frequent flier mileage information from an airline. To do so, the aggregator may request access to personal information — including identification information, account information, personal IDs and passwords — from you for each individual website.

Please use caution when providing personal information to an aggregation service. By providing your username, password or other credentials to an aggregation service you authorize that person or third party to initiate transfers to or from your account.

Should you decide to revoke the authority you have given to an aggregation service, you should notify the aggregation service. In addition, if you are having difficulty revoking the aggregation service's permission, please notify us at any branch location or call us at 417-532-2265. We may need to block your account until we issue new access codes.

Social Media Platforms

Heritage Bank of the Ozarks may interact with registered users of various social media platforms, including Facebook® and X®. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile), is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.

Retention Period

We will retain your personal information for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required by law.

Cross-Border Transfer

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any country or territory other than that of the United States. We may store and process your personal information in any country where we have facilities or in which we engage service providers, and, by using our products and services, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

Changes to the Online Privacy Policy

From time to time, we may make changes to this Policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We encourage you to review the Policy periodically to ensure that you understand how we collect, use and share information through our products and services. If we do make changes to the policy, we will let you know by posting the revised policy with a new "Last Updated" date posted at the top of the Policy.

Any changes to the Policy will become effective when the revised Policy is posted on the Website, relevant Application or other Heritage Bank of the Ozarks online interface, as applicable. By continuing to use our products and services following such changes, you are agreeing to accept the terms of the revised Policy.

Contact Us

If you have any questions or comments about this Policy or our privacy practices generally, we encourage you to contact us at 417-532-2265 or the Contact Us link on our website

<https://www.heritagebankozarks.com>. Alternatively, you may contact any of our local branches either by telephone or going into one of our branches near you.

In the event you notice suspicious activity on your account or believe your personal ID, password or PIN has been compromised, please contact us immediately at 417-532-2265.