

# Cookies and Tracking in Digital Banking

All major browsers have a privacy setting for tracking or no tracking. Digital Banking does not honor the Do Not Track settings in browsers. Online & Mobile Banking require Personally Identifiable Information (PII) such as a login ID and password to enable end-users the ability to conduct transactions during their Online Banking session. We consider logging in to be the end-user's consent to track their activity to provide them with their banking information.

This information also addresses California Assembly Bill 370 (AB370) requiring businesses to disclose how they respond to Do Not Track requests.

## **Financial Institutions using web analytic software**

If your financial institution uses web analytic software such as Adobe Analytics, you may want to provide a disclosure in your Privacy Policy so end-users are aware that the Adobe software identifies, tracks and aggregates web activity the end-user conducts while visiting the FI's website, so the FI can analyze usage and create marketing programs to benefit FI clients. Tracking includes the website end-users visited prior to the FI's website, and the website visited after leaving the FI's website. Note that the Adobe Analytics software does not collect any Personally Identifiable Information (PII).

## **Financial Institutions with Money Management**

If your financial institution offers money management, you may want to provide a disclosure and agreement to end-users outlining the terms of using the product and making them aware that Money Management includes retrieval and aggregation of outside account information using credentials provided by the end-user. The product will obtain the account information using the end-user's login ID and password for each outside account to enable aggregation and categorization of transactions to display to end-users, facilitating personal financial management.

## **Financial Institutions with Purchase Rewards**

If your financial institution offers Purchase Rewards you may want to provide a disclosure requiring the end-user's acceptance in your Privacy Policy statements, to ensure they are aware and agree with receiving targeted offers. To present those offers, the Purchase Rewards product tracks and collects end-user debit card transaction activity. The product will obtain the merchant names and products

purchased via debit card to generate targeted offers that will present the end-user with an incentive (cash reward) to purchase the same or similar product from the same, different or similar type of merchant.

Please submit an incident to Customer Care to review options for how to update current or to create new disclosures.