



ISRAEL DISCOUNT BANK OF NEW YORK GLOBAL PRIVACY POLICY

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I. INTRODUCTION

The Israel Discount Bank of New York Global Privacy Policy (“Policy”) explains what personal information that Israel Discount Bank of New York (“IDB Bank” or “the Bank”) and its subsidiaries and affiliates (collectively, “our”, “we” or “us”) collects about you, and how the Bank uses, discloses, protects and safeguards your personal information.

This Policy discloses the Bank’s privacy practices and applies to information that is collected online through www.idbny.com (“the Site”), visitors to the Bank’s premises (including regional headquarters and branches), individuals who register for or attend events that are organized by the Bank, and recipients of communications issued by or on behalf of the Bank.

Personal information that we collect from or about you when you apply for or obtain an IDB Bank product or service for personal, family or household purposes is governed by a separate consumer privacy notice. If you are a potential, current or former customer or consumer of the Bank and/or its subsidiaries, this Notice or one (or more) of the below privacy notices may be applicable to you. The notices below contain additional information about our privacy practices applicable to your product or service with IDB Capital Corporation and IDB Lido Wealth LLC.

- IDB Capital Corp.
- IDB Lido Wealth LLC

Personal information that we collect about you when you act as an employee or contractor for IDB Bank is governed by a separate employee privacy notice, which will be provided to you at or before the time of collecting your personal information.

II. WHAT PERSONAL INFORMATION WE COLLECT

As described throughout the rest of this Policy, we may collect your personal information for business purposes, to provide you with requested products or services, or for any other purposes, as permitted by



law. This section illustrates the categories of personal information that the Bank may collect about you to disclose with its subsidiaries and/or affiliates.

Category of Personal Information We May Collect	Examples of Personal Information We May Collect
Personal Identifiers	Your name, alias, postal address, email address, bank account number, credit card number, social security number, driver's license information, passport number, and other similar identifiers.
Sensitive Personal Information*	Social security number, driver's license information, state identification card, passport number, religious or philosophical beliefs, health information, health insurance information, and citizenship, Green Card, and/or Visa information
Financial Information	Financial account number, account balance, loan number, loan amount, account history, income, debt, assets, credit history, credit score, investment experience
Account Authentication and Verification Information	PIN number, CVV number, security question and answer
Protected Classification Characteristics Under California or Federal Law	Your age, race, national origin, citizenship, religion or creed, marital status, sex, veteran or military status
Internet or Similar Network Activity	Browsing history, search history, session information, and other information about how you interact with our website and mobile applications
Professional or Employment-Related Information	Past or current employment history and information (including employer name), professional license or registration information, and employment identification number, salary or compensation information
Education Information	Academic record information, degree information, schooling history

***Please note:** Sensitive personal information is a higher risk subset of personal information. IDB Bank does not infer characteristics about you based on your sensitive personal information unless permitted by applicable law, including the CCPA and its regulations. IDB Bank routinely limits the use and disclosure of sensitive personal information to the following purposes: (1) to provide short-term, transient and non-personalized advertising; (2) to perform business services, such as enhance the quality of service we deliver to consumers; and (3) to ensure the physical safety of our personnel, customers, and others.

III. WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect and use your personal information for the following business priorities:

1. **For Products and Services:** We collect and use your personal information as necessary to administer and manage your relationship with us by providing products and services to you. This may include disclosing your personal information internally (for example, across business lines, affiliates, and subsidiaries) and externally (for example, to a third party, such as a credit bureau or vendor), as described in this Policy and any other privacy notice that is issued to you in your connection with our products and services.
2. **To Meet Legal, Industry and Internal Governance Obligations:** We collect and use your personal information to satisfy our legal, contractual, regulatory and compliance obligations; to comply with relevant industry standards; and to comply with our policies and procedures.



3. **For Contact Purposes:** We collect and use your personal information to contact and communicate with you.
4. **For Site Functionality:** We collect and use your personal information to enable administration of and functionality on our website.
5. **To Improve Our Business, Products and Services:** We collect and use your personal information to evaluate, improve, and continuously operate our business, products and services. This may include using your personal information to assess and manage risk, develop new products and services, and improve existing ones.
6. **To Conduct Internal Bank Functions:** We collect and use your personal information to perform accounting, auditing, other internal bank functions.
7. **To Protect Against Fraud:** We collect and use your personal information to authenticate your identity, to mitigate against fraud and fraudulent behavior and to enhance the security of the Bank's products and services offered;
8. **For Market Activity and Marketing Purposes:** We collect and use your personal information to conduct market activity, identify target marketing recipients, and deliver marketing communications.
9. **For Social Media Purposes:** We collect and use your personal information to respond to, review, or interact with social media messages and/or post about our products and services.

IV. DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to the following third parties and for business purposes as set forth below:

To IDB Bank Subsidiaries and Affiliates: We may disclose your personal information with IDB Bank subsidiaries and affiliates in order to accommodate your business needs, to market, provide and improve our products and services or for other purposes permissible under applicable regulations and laws.

To Our Vendors, Service Providers and Business Partners: We may disclose your personal information to non-affiliated companies of the Bank. These non-affiliated companies, which are our third-party vendors, service providers, and business partners, may perform support services for the Bank, such as security services, mail and email services, information technology, risk management, customer services and others.

For Due Diligence Legal Processes: We may disclose personal information to third parties to comply with applicable laws and regulations, as permitted. Examples of legal processes for which we'd need to disclose your personal information include: to protect against fraud, to cooperate with legal and regulatory authorities, or to respond to a subpoena or similar or related due diligence. The Bank, its subsidiaries, and affiliates may disclose personal information in order to protect the property or safety of itself, as an entity, as well as its employees, customers, consumers, or others. The Bank may also disclose personal information in order to enforce its legal rights, as well as those of its subsidiaries and affiliates.

For Transactional Purposes: We may disclose your personal information to a buyer or other successor in connection with a merger, divestiture, restructuring, reorganization, dissolution, or similar proceeding,



in which personal information held by us about our website users is among the liabilities or assets transferred.

Please note: The phone numbers, opt-in consent and any mobile information that we collect and receive via our website will not be shared with third party service providers and affiliates, specifically for marketing and promotional purposes.

V. INFORMATION SECURITY: HOW YOUR PRIVACY IS PROTECTED

IDB Bank takes protecting your personal information very seriously. The Bank maintains physical, electronic, and procedural safeguards and controls that are designed to protect against and prevent personal information loss, damage, misuse, or modification and unauthorized access while in our possession.

We train our employees on our internal Privacy Policy, Information Security Program and related internal policies and procedures. We work to limit access to personal information to only those authorized employees, contractors, or vendors that need it to perform their business functions.

VI. RETAINING YOUR PERSONAL INFORMATION

We retain your personal information consistent with our document retention policy and other policies and procedures, which establish standards and guidelines regarding the retention, handling, and disposition of our records and personal information. Your personal information is retained as long as is necessary to administer our products and services to you, as well as meet any applicable legal and regulatory requirements. Retention of your personal information may be extended if we are required to preserve it in connection with litigation, investigations or any other legal or regulatory proceedings.

VII. OUR COOKIE POLICY

This section on cookies shall be carefully reviewed before engaging with the Site.

Cookies and How We Use Them

Cookies are small text files that are stored on devices, such as a computer or mobile device, allowing web servers to track your browsing activity. Cookies are widely used by service providers and businesses to operate and run their websites more efficiently, for marketing and advertising purposes, and to report information. Cookies are an important tool that can give service providers and businesses insight into their users' online activity.

We employ three types of cookies:

1. **Necessary (or "essential") cookies** for you to browse our website and use its features. Necessary cookies are placed on your device directly by the Bank's website. These cookies make it possible for us to know when you have created an account and have logged into that account through our website.
2. **Preference (or "functionality") cookies**, which allow the Bank to collect data on your choices and remember your past preferences. For example, preference cookies allow us to remember your username and customizations made to the Site for current and future visits.
3. **Performance (or "analytics") cookies**, which allow the Bank and third-party services to collect aggregated data on how visitors use the Site. These cookies are used exclusively for statistical



purposes, and do not contain personal information such as names and email addresses. The Bank uses performance cookies to help improve a user's experience with the Site.

VIII. YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM

This section describes your privacy rights as a customer and consumer of the Bank, and how to exercise those rights under particular regulatory regimes, such as the California Consumer Privacy Act ("CCPA") as amended by the California Privacy Rights Act ("CPRA").

California residents, for example, should be aware that this section does **not** apply to:

1. Sector-specific laws and regulations, such as the Gramm-Leach-Bliley Act, Fair Credit Reporting Act, California Financial Information Privacy Act, and others.
2. Information collected about you when you apply for or obtain financial products and services for personal, family or household purposes.
3. Other information subject to CCPA exceptions.

Description of Your Rights

Subject to certain exceptions and depending on where you are based and other circumstances, you may have the following rights regarding covered personal information that we collect from or about you.

- **Right to request access to personal information and details about how we use it:** You have the right to request access to information that we collect about or from you. You can request information from us including:
 - Specific pieces of personal information that we have about you and to have them transferred to a third party;
 - Categories of personal information collected about you, shared, and disclosed (as applicable);
 - Categories of sources from which your personal information is collected;
 - Categories of third parties with whom your personal information was shared or disclosed; and
 - The purpose(s) for collecting and sharing your personal information.
- **Right to request we delete personal information:** You have the right to request that we delete personal information collected from or about you.
- **Right to correct personal information:** You have the right to request that we correct inaccurate personal information maintained about you.
- **Right to opt-out of the sale or sharing of personal information or object to processing:** You have the right to request to be opted out from the sale or sharing of your personal information. We do not sell your personal information for monetary gain. However, we may share your personal information with vendors, service providers and other third parties, as previously stated in this Policy. You may also have the right to object to, or restrict processing of your personal data.
- **Right to non-discrimination:** You have the right to not be discriminated against as a result of exercising any of the aforementioned rights.
- **Right to complain:** You have the right to lodge a complaint with the relevant regulatory authority.



Please note: The rights described above do not apply to certain categories of personal information collected of you, including personal information we collect from or about you when you apply for or obtain a financial product or service from us, among other categories.

How to Exercise Your Rights

Bank customers and consumers can exercise their privacy rights by dialing the Bank's toll-free number, (888) 695-3661, by emailing their privacy rights requests and inquiries to privacyinquiries@idbny.com, or by filling out a web form via the Privacy-designated page on our website, www.idbny.com.

IX. OTHER IMPORTANT INFORMATION

Changes to this Policy

We reserve the right to amend and change this Policy at our discretion. Should we make changes to this Policy, we will update its "Last Modified" date. Any changes to the Policy will become effective when it is published online, unless specified otherwise. Your continued use of the Bank's products and services following these changes mean that you accept the changes that are made to this Policy.