

### **E-Sign Consent Agreement**

***Please read this E-SIGN Disclosure and Consent Agreement carefully and print a copy or retain this information electronically for your future reference.***

Laurel Road is a brand of KeyBank N.A. All products are offered by KeyBank N.A. Member FDIC. **Student loans, mortgages, personal loans, and credit cards ARE NOT FDIC INSURED OR GUARANTEED** NMLS #399797. Equal Housing Lender. ©2023 KeyCorp® All Rights Reserved.

As part of your relationship with us we want to ensure you have all the information you need to receive financial services from us. We are required by law to give you certain information “in writing” which means you are entitled to receive it on paper. As a user of one or more of our electronic banking or financial products or services, we wish to provide to you this information electronically instead. To do so, we need your consent. We also need your consent to use electronic signatures in our relationship with you. So, before you use our Electronic Services (as defined below) you must review and consent to the terms outlined below.

In this consent:

- “We,” “us,” “our” and “Lender” means KeyBank National Association and its respective affiliates, subsidiaries, agents, guaranty insurers, investors, assigns, and successors in interest.
- “You” and “your” means the person giving this consent, and also each additional account owner, authorized signer, authorized representative, delegate, product owner or service user identified on any Laurel Road Product that you apply for, use or access.
- “Communications” means each disclosure, notice agreement, fee schedule, statement, record, document, and other information we provide to you, or that you sign or submit or agree to at our request.
- “Electronic Service” means each and every Laurel Road Product we offer that you apply for, use, or access using the Internet, a website, email, messaging services (including text messaging) or software applications (including applications for any mobile or hand-held devices), either now or in the future.
- “Laurel Road Product” means any financial product or service offered under the Laurel Road brand name by Lender.

### **1. CONSENT TO USE ELECTRONIC RECORDS AND SIGNATURES**

The Communications we provide to you, or that you sign or agree to at our request, will be in an electronic form (“Electronic Records”). We may also use electronic signatures and obtain them from you as part of our transactions with you. Notwithstanding, we reserve the right to provide you with any Communication in writing, even if you have chosen to receive it electronically.

In the event that a law prohibits the electronic delivery of certain Communications, even with your consent, we will provide such Communications to you in writing. However, should such laws change,



allowing us to deliver those Communications to you electronically, this consent will automatically cover those Communications as well.

Examples of electronic records covered by your consent include, but are not limited to, the following:

- This E-Sign Disclosure and Consent Agreement and any amendments to it;
- All Communications related to a Laurel Road Product to the extent electronic delivery is not otherwise prohibited by law;
- Any notice or disclosure regarding fees or assessments of any kind, including late fees, overdraft fees, over limit fees, and returned item fees;
- Notices of amendments to any of your agreements with us; and
- Other disclosures and notices that we are either legally required to provide to you or choose to provide to you in our discretion.

## **2. AVAILABILITY OF PAPER COPIES**

If you want a paper copy of any Electronic Record we provide you, you may either print them from your computer or contact Laurel Road Customer Service at 1-833-427-2265 (1-833-HCP-BANK) TDD/TTY: 800- 539-8336. Upon request, a paper copy of the Electronic Record will be mailed to you at no charge.

## **3. CONSENT COVERAGE**

- Your consent covers all Communications relating to each and every Laurel Road Product we offer that you apply for, use, or access using the Internet, a website, email, messaging services (including text messaging) or software applications (including applications for any mobile or hand-held devices), either now or in the future.

Your consent remains in effect until you give us notice that you are withdrawing it.

Should you seek another Laurel Road Product from us in the future, we may present you with this E- Sign Disclosure and Consent Agreement again. Should you decide not to use Electronic Records and signatures in connection with the new Laurel Road Product, such decision does not mean you have withdrawn any prior consent given by you to us to provide you with Electronic Records. *See below for information on how to withdraw this consent.*

## **4. WITHDRAWING YOUR CONSENT FOR ELECTRONIC DELIVERY**

You have the right to withdraw your consent at any time. However, please be aware that withdrawal of consent may result in the termination of your access to our Electronic Services and your ability to use certain Laurel Road Products.

Your withdrawal of your consent will become effective after we have had a reasonable opportunity to act upon it.

To withdraw your consent, you must call Laurel Road Customer Service at 1-833-427-2265 (1-833-HCP- BANK). TDD/TTY: 800-539-8336.

## **5. YOU MUST KEEP YOUR EMAIL OR ELECTRONIC ADDRESS CURRENT WITH US.**

You must promptly notify us of any change in your email or other electronic address. You may change your email address by accessing the 'Settings' feature within your online Account Dashboard and editing your contact information.

## **6. HARDWARE AND SOFTWARE REQUIREMENTS**

In order to receive Electronic Records, you must have access to:

- A valid working email account;
- A connection to the Internet;
- The latest version of one of the following web browsers: Google® Chrome, Apple® Safari, Microsoft® Internet Explorer; Microsoft® Edge;
- Adobe® Acrobat Reader 7.0 or higher; and
- A computer and operating system capable of supporting all of the above.

**By selecting the "I AGREE" button you confirm that you have access to the above and that you are able to view files in a Portable Document Format ("PDF").**

## **7. CHANGES TO HARDWARE OR SOFTWARE REQUIREMENTS**

If our hardware or software requirements change, and that change would create a material risk that you would not be able to access or retain Electronic Records, we will give you notice of the revised hardware or software requirements. Continuing to use Services after receiving notice of the change is reaffirmation of your consent.

## **8. ACKNOWLEDGEMENT**

**By clicking the "I AGREE" button**, you acknowledge that you are able to view and have read this E-Sign Disclosure and Consent Agreement and that you are agreeing to electronically access, receive, review, sign, and authenticate Electronic Records covered by the federal Electronic Signatures in Global and National Commerce Act ("E-Sign Act"). You further acknowledge that your electronic signature will bind you to the same extent as if you had signed on paper with an ink signature.

**Do not click the "I AGREE" button if you do not wish to consent to Electronic Communications.** You will not be able to use the Electronic Services for a Laurel Road Product provided by Lender.



FACTS	WHAT DOES KEYCORP DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product and services you have with us. This information can include: <ul style="list-style-type: none"><li>• Social Security number and income</li><li>• Account balance and payment history</li><li>• Credit history and credit scores</li></ul>
How?	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons KeyCorp (Key) chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Key Share?	Can you limit the sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts, and respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes</b> - to offer our products and services to you	YES	NO
For joint marketing with other financial companies	YES	NO
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	YES	NO
<b>For our affiliates everyday purposes</b> - information about your credit worthiness	YES	YES
<b>To our affiliates to market to you</b>	YES	YES
<b>For nonaffiliates to market to you</b>	NO	We don't share

To limit our sharing	<ul style="list-style-type: none"><li>• Call 1-800-361-0968 - our menu will prompt you through your choices</li><li>• Visit us online: <a href="http://www.key.com/security">www.key.com/security</a></li></ul> <p><b>Please Note</b> If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we can continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call 1-800-361-0968 or go to <a href="http://www.key.com/security">www.key.com/security</a>
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Who we are	
Who is providing this notice?	KeyCorp (Key) and the Key family of companies (see affiliate list below).

What we do	
How does Key protect my personal information?	To protect your information from unauthorized access and use, we use security measures that comply with federal law. These measures includes computer safeguards and secured files and buildings.
How does Key collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• Open and account or deposit moneys</li> <li>• Pay bills or apply for products and services</li> <li>• Use your credit card or debit card.</li> </ul> <p>We also collect your personal information from others such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes-information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	If you have a product held jointly with another person(s), each of you may opt out individually or you may opt out for each other.

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies. The Key family of companies, includes: KeyBank National Association; KeyBanc Capital Markets Inc.; Key Financial Services Inc.; Key Investment Services, LLC; KeyCorp Insurance Agency USA Inc.; KeyCorp Insurance Agency USA Inc. (ID); KeyCorp Insurance Agency USA Inc. (WA); Austin Capital Management LTD.; Austin Capital Offshore Management, LLC.; Key Trust Company of Delaware; KPB Investment Advisors LLC; Key Community Development Corporation; Pacific Crest Securities LLC.</p> <p>For a current list of the members of the Key family of companies, visit <a href="http://www.key.com/privacy">www.key.com/privacy</a>.</p>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other Important Information

You may have other privacy protections under applicable state laws. For example, if you have a California or Vermont mailing address we will automatically limit internal sharing and sharing for marketing use within the Key family of companies. Key does not share customer information with third parties, except as permitted by law. These sharing limitations will continue for as long as our records indicate you are a Vermont or California consumer. If our records show you no longer reside in Vermont or California, your opt outs will revert back to the preference(s) originally on file with Key. However, you may still limit sharing by recording your preferences with Key, by calling our toll-free Privacy Line at 800-361-0968.

Special Notice for Nevada (Nevada law also requires that we provide you with the following contact information)

KeyCorp Privacy Department OH-01-49-2995 4900 Tiedeman Rd. Brooklyn , OH 44144	Bureau of Consumer Protection Office of the Nevada Attorney General 555 E. Washington Street, Suite 3900 Las Vegas, Nevada 89101 Phone: (702) 486-3132 Email: BCPINFO@ag.state.nv.us
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# KeyCorp Online Privacy Statement

KeyCorp (together with its subsidiaries and affiliates, “Key” or “we”) is committed to maintaining the privacy and security of Personal Information. This Online Privacy Statement (“Statement”) explains how Key collects, uses, shares, and protects your Personal Information. This Statement applies to our clients, employees, and other individuals from whom we collect Personal Information when you interact with us through Key’s digital properties (e.g., websites, mobile applications), physical locations, such as branches, and affiliated websites displaying this Statement.

KeyCorp refers to all Key brands and affiliates including, but not limited to, KeyBank, Laurel Road, GradFin, and Key Investment Services.

The term Personal Information means information that alone or when in combination with other information may be used to identify, contact, or locate you, such as: address, email address, or phone number. Within this Statement, the term Personal Information also includes Sensitive Personal Information unless otherwise specified in the sections below. Sensitive Personal Information is called out separately in this Statement if it is handled differently. Sensitive Personal Information includes, but is not limited to, your social security number, drivers license and state identification numbers, login information, and financial account numbers.

At Key, we adhere to the following privacy principles:

- We do not sell your Personal Information;
- We do not allow those who are doing business on our behalf (i.e., our service providers) to sell your Personal Information or use your Personal Information for their own marketing purposes;
- We contractually require any person or organization providing products or services on our behalf to protect your Personal Information;
- We may share your Personal Information and permit others to use your Personal Information only if: you consent; it is necessary to originate a service or transaction you request; it is necessary to facilitate job applicant and employment processes at KeyCorp; or it is otherwise permitted or required by law;
- We handle Personal Information about former and prospective clients and non-clients the same as existing clients;
- We handle Personal Information about KeyCorp former and prospective employees the same as existing employees.

If we change our privacy practices set forth in this Statement, we will make updates to this Statement and will provide additional notification to you, where required by law.

For any inquiries regarding our privacy practices, please call 1-800-KEY2YOU (539-2968).

For our Consumer Banking clients, please also see our [KeyCorp Privacy Notice](#).

For Key employees and job applicants, please contact [HR\\_Compliance@KeyBank.com](mailto:HR_Compliance@KeyBank.com) for additional information on our privacy practices related to employment and applicant information.

## How We Use Your Personal Information

We use your Personal Information for reasons and business purposes such as:

- Facilitating the processing and servicing of your requested transactions;
- Confirming your identity and preventing, detecting, and monitoring for fraudulent activity on your accounts;
- Marketing our products and services to you and tracking the effectiveness of our advertisements;
- Improving our products and services and ways to better service your requests and/or inquiries;
- Responding to your feedback and inquiries;
- Monitoring website or mobile usage and/or performance;
- Remembering personal settings and preferences to enhance your customer experience;
- Developing and offering you additional options or enhancing your online experience;
- Providing you personalized insights into the usage and management of your accounts;
- Ensuring technological compatibility with your computer and mobile devices;
- Facilitating our employment processes for Key employees and job applicants; and
- Performing other activities as required by law.

For our clients and employees, we use your Sensitive Personal Information for reasons and business purposes such as:

- Facilitating the processing and servicing of your requested transactions;
- Confirming your identity and preventing, detecting, and monitoring for fraudulent activity on your accounts;
- Facilitating our employment processes for Key employees and job applicants; and
- Performing other activities as required by law.

We do not collect Sensitive Personal Information from website visitors or nonclients, including prospective clients or marketing leads.

Key and its service providers may also use anonymized or de-identified information for analysis to understand more about our customers and our industry, or for commercial purposes permitted by law. This information is not Personal Information.

See **Other Important Information Related To The Use And Control Of Your Information** section for additional details.

## What Personal Information We Collect

We collect your Personal Information in different ways depending on how you interact with us. For example, we collect your Personal Information from:

- Interactions with our corporate and social media websites and mobile environments through the use of cookies, pixels, web beacons and other similar technologies;
- Interactions with our digital advertisements;

- Mobile device interactions with physical hardware beacons/nodes where Key conducts business (e.g., branches, ATMs, and sponsorship, marketing placements and marketing events);
- Applications and other forms related to our products and services;
- Conversations, in person, over the phone, text, or email, and online chats with Key representatives;
- Social media interactions with our owned social media properties;
- Transactions or experiences with us, such as payments, underwriting, and servicing;
- Completion of surveys or forms;
- Service providers, including consumer reporting agencies and marketing agencies; and
- Employment applications and processes for those who apply for employment at Key.

Depending on your relationship with us, the categories of your Personal Information and Sensitive Personal Information we collect may vary depending on your interaction with us but include:

#### Personal Information:

- Your demographic information such as name, current address, telephone number, mobile telephone number and social security number;
- Information about you such as your birth date, prior addresses, and marital status;
- Information about your accounts with us such as account numbers and account username;
- Information about your financial standing such as credit score and credit history;
- Your employment information such as current and prior employers, employment title and incomes;
- Your education information such as degrees held and years of schooling;
- Your internet/electronic network activity information such as your internal protocol (IP) address; mobile device identifier; and geolocation data;
- Characteristics of protected classifications such as military/veteran status and ethnicity; and
- Your biometric information such as your voice print or voice recording for certain identity verification when you contact us.

The Sensitive Personal Information contained in the above may include:

- Your social security number and other identification numbers such as drivers license, state identification, passport, or military identification;
- Your financial account numbers;
- Characteristics of protected classifications such as military/veteran status and ethnicity;
- Your biometric information for certain identity verification.

We retain each category of Personal Information above for the lengths of time required by applicable law and our retention policies.

## How We Share Your Personal Information

We share your Personal Information among our affiliates (defined above) to offer additional products and services to you. This sharing occurs only within the Consumer Banking division including KeyBank, Key Investment Services, Laurel Road, and GradFin brands.

In addition, we share your Personal Information with our contracted service providers for the uses described in the "HOW WE USE YOUR PERSONAL INFORMATION" section above. The categories of third parties with which we share your Personal Information include:

- Loan and transaction servicers;
- Marketing service providers;
- Credit reporting agencies;
- Technology service providers;
- Employment service providers for Key job applicants and employees.

You authorize us to share, and you consent to our sharing, your mobile subscriber details with service providers which will request your mobile carrier to use your mobile subscriber details for verifying your identity. Those details may include name, billing address, email, and phone number. This information may also include location information, if available. Additional use of your mobile subscriber data may be subject to third party privacy policies.

In addition, we may partner with third-parties (e.g., Meta, Google, LinkedIn, Trade Desk) to deliver and monitor advertisements on our Site and other sites across the web and digital properties (e.g., websites, mobile, etc.). We and/or our partners may monitor and record advertisement interactions, Web traffic, activities on third-party websites, and other activities in order to improve visitor experience and provide relevant advertising. We and/or our partners may use cookies, web beacons, or other monitoring technology to compile statistics about website traffic.

To learn more about this type of advertising, including how to opt out of certain types of online advertisements, please visit the Network Advertising Initiative's website at [www.networkadvertising.org](http://www.networkadvertising.org). Also note that opting out of this activity will not prevent advertisement placement. Generally speaking it will limit the placement of advertising that may interest you and place advertisements at random that may not be relevant to you.

We do not sell or otherwise share your Personal Information with third parties.

## How We Protect Your Personal Information

We take our responsibility to protect your information very seriously. We use reasonable physical, technical, and procedural safeguards to secure your information from unauthorized use, access, alteration or disclosure. Please see [Privacy & Security](#) section for additional information.

## What Your Privacy Rights Are and How You Can Exercise Your Privacy Rights

There are a number of privacy rights that may be afforded to you by laws and regulations regarding your Personal Information. Related to your interaction with KeyCorp, these privacy rights are as follows:

### For California Residents under the California Privacy Rights Act (CPRA)

California residents have the right to request a copy of the categories or specific pieces of Personal Information a business has collected about them or to request deletion of certain Personal Information collected from the California resident. In addition, CPRA provides the right to correct inaccurate Personal Information a business maintains about the California resident.

Prior to processing your request and to protect your Personal Information, Key will perform reasonable processes to verify your identity which will require you to provide certain information for us to confirm against our records or independent sources. To submit a request to access your Personal Information we collect or to submit a deletion request for certain Personal Information click on the link to access our [CCPA request page](#) or call 1-800-KEY2YOU (539-2968).

If you are client and have identified Personal Information that needs correction, please call 1-800-KEY2YOU (539-2968).

If you are an employee and your information requires correction, please contact [HR\\_Compliance@KeyBank.com](mailto:HR_Compliance@KeyBank.com).

In addition to your California privacy rights to request, correct, or delete your Personal Information, CPRA also provides you with the right:

- To not receive discriminatory treatment by any business for exercising your privacy rights under CPRA.
- To authorize an agent to exercise your privacy rights on your behalf. Your authorized agent can submit a request by calling 1-800-KEY2YOU (539-2968).
- Submit a request to access, correct, or delete household information. For inquiries and requests related to households you can contact 1-800-KEY2YOU (539-2968).
- To know what Personal Information is sold or shared and to whom and the right to opt-out of this sharing and selling. However, Key does not sell or share your Personal Information as defined under CPRA or otherwise outlined in this Statement. For inquiries and requests related to CPRA selling and sharing you can contact 1-800-KEY2YOU (539-2968).
- To limit the use of your Sensitive Personal Information. However, we only use your Sensitive Personal Information for the purposes outlined in this Statement and our [KeyCorp Privacy Notice](#). You cannot limit this sharing because it is necessary for KeyCorp to perform its services and products requested by you. For inquiries and requests related to the use of Sensitive Personal Information you can contact 1-800-KEY2YOU (539-2968).

### For Customers to limit information sharing among Key affiliates for marketing purposes:

To limit the sharing of your Personal Information among Key affiliates you can call 1-800-361-0968 and follow the prompts accordingly. Please see our [KeyCorp Privacy Notice](#) for more information on this sharing.

### General Marketing Preferences

We offer you additional choices to limit our marketing to you including limiting our mail, telephone, and email marketing. Please contact us at call 1-800-361-0968 and follow the prompts accordingly.

## Children's Online Privacy

Our online services are not intended for the use of children under the age of 13. We do not knowingly collect or retain any Personal Information from individuals under the age of 13 online. To learn more about the Children's Online Privacy Protection Act (COPPA) please visit the Federal Trade Commission's [website](https://www.ftc.gov/) or at <https://www.ftc.gov/>.

## Other Important Information Related To The Use And Control Of Your Information

### Links to Third-Party Websites including Financial Data Aggregators

Our digital properties (e.g., websites, mobile applications) may contain links to third-party websites that link our products/services to Financial Data Aggregators (FDAs) when you choose to utilize services offered by FDAs. You should use caution and ensure that the FDA has appropriate policies and practices to protect the privacy and security of the information you provide. The use of your information by the FDA is governed by the FDA's terms of use, not by Key. Key is not responsible for any information that you provide FDAs and if you share your information such as username and password, we will consider that you have consented and authorized any transaction initiated by using the information you provided.

Our Site may also contain information from third-party sites or provide surveys, advertisements, online calculators, forms, tips and tools related to fraud prevention or links to governance regulator websites for additional information. These links, pointers, and information from third party websites or applications are not part of our Site. This Statement does not apply to the online practices of these third-party websites. Key does not make any representations or warranties regarding these third-party websites. We are not responsible for any losses or damages in connection with the information, security, privacy practices, availability, content, or accuracy of materials of such third-party websites or applications. These third-party websites or applications might have Terms of Use or Privacy Policies different from us and third-party websites may provide less privacy and/or security than our Site. We encourage you to review the Terms of Use and Privacy Policy of all third-party websites before you share any Personal Information with them.

### Physical Hardware Beacons at Our Bank Locations

Our customer-facing physical locations such as branches, ATM vestibules, and Key sponsorship/marketing events may also utilize your mobile device location services to identify when you are in or around one of our physical locations. You will be prompted to allow Key access to your location services. We may use your location services including your mobile device identifier to communicate with you including welcoming you to our properties, targeting advertisements, or offering other services such as automatically unlocking an ATM vestibule as you approach and locating a nearby branch. When you download our mobile



application, you are provided additional information on this data collection and how to enable or disable the sharing over your mobile device information. You can enable/disable location sharing for our mobile applications within Settings of Key Applications on your own device at any time.

#### Use of Artificial Intelligence to Enhance Your Customer Experience

When you use our digital properties, we may utilize Artificial Intelligence (AI) based software or other mathematical models to analyze your financial transaction history and provide you with personalized insights into your account activity over time to assist with managing your finances. For example, notifying you when your paycheck is direct deposited; alerting you when you have a payment scheduled but not enough funds in your account; and providing suggestions on performing certain activities to save money. You consent to the use of this software when you accept the terms and conditions of our digital properties.

#### Third-Party Widgets

Please also be aware that we allow certain widgets (e.g., social share buttons) on our digital properties that enable users to easily share information on another platform, such as a social media platform. The third parties that own these widgets may have access to information about your browsing on pages of our digital properties where these widgets are placed.

#### Cookies

Cookies are small text files that are placed on your device to distinguish you from other visitors to our digital properties. The use of cookies helps Key to improve your experience on our digital properties by helping provide usage data on the performance of our digital properties. The use of cookies is a standard practice. Key or our third-party advertising service providers may place cookies or similar files on your device's hard drive. Certain browsers can inform you every time a cookie is being sent to you and certain web browsers allow you to choose not to accept cookies. You can also delete cookies from your computer at any time. If you refuse cookies, the functionality of our website may be impacted or become non-functional. Since every browser and device is different, you will need to follow your browser's instructions for disabling or deleting cookies. Most web browsers allow you to delete or decline cookies, however doing so may impact your digital experience. For example, you may have to identify yourself more frequently, as services like Online Banking require you to accept cookies or similar files in order to function properly.

#### Pixels, Web Beacons, and Other Technologies

Key or our third-party advertising service providers may also use technologies to track users' interactions with our digital properties. Some of these technologies include web beacons (transparent graphical images placed on a website), pixels, tags, and Flash objects (also referred to as "Local Shared Objects"). Please refer to your browser's instructions to remove cached sites, history, and images from your device.

#### Additional Information on Digital Behavioral Advertising

Key and other third parties may collect information about your digital activities over time and across different digital properties when you use our digital properties. Some of the advertisements that click-through to Key's digital presence and/or may be on Key's digital presence contain cookies that allow for the monitoring of your response to these advertisements (sometimes referred to as interest-based advertisements), to help understand campaign effectiveness. This information is used by Key and others to analyze and track data, determine the popularity of certain content, deliver content targeted to users' interests on our services and other digital properties, and to better understand digital activity. Key's advertisements may also appear on other digital properties that use the same advertising service providers as Key does. These advertising service providers may use your browsing history across websites to choose which advertisements to display to you.

How browsers communicate Do Not Track signals is not yet uniform. As a result, this site is not currently equipped to interpret or respond to Do Not Track signals communicated by your browser. To learn more about online tracking, you can visit the Future of Privacy Forum's ["All About Do Not Track"](#) website.

If you do not wish to have us or our third-party advertising service providers know which advertisements and subsequent websites you have viewed, you may opt-out at AboutAds (established by the Digital Advertising Alliance). The Digital Advertising Alliance website contains important information on cookies, behavioral advertising, and what opting out will and will not do and choices you can make regarding interest-based advertisements.

To learn more about this type of advertising, including how to opt out of certain types of online advertisements, please visit the Network Advertising Initiative's website at [www.networkadvertising.org](http://www.networkadvertising.org).

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These tracking technologies are used to gather information about Key's user base. The information collected may include device-specific information (including, but not limited to, hardware model or version, operating system version, and unique device identifiers) and unique application numbers if included within the respective service. Key may produce and receive reports on this information from and by leveraging analytic service providers to understand specific market segments based on the demographic, location, and interest data received. This information may be used for, but not limited to, Remarketing, Display Network Impression Reporting, and Demographics and Interest Reporting. The use of these tracking features is governed by Google's Privacy Policy, as amended by Google. You may opt-out of this data collection by installing the Google Analytics Opt-Out Browser Add-on and Google Ad Removal Plugin.

Please note: opting out of behavioral advertising will not stop you from receiving advertisements. You will still see the same number or a similar number of advertisements as before, but they may not be as relevant to you. If you use other devices or browsers and want to opt out of interest-based advertisements, you will need to repeat this process for each computer or browser. If you delete your cookies and want to continue to be opted out of interest-based advertisements, you will have to repeat this opt-out process.

#### Secure Submission of Personal Information

Please only submit Personal Information to Key through secure channels such as online applications, over the phone, or as otherwise directed by a Key representative. Do not provide Sensitive Personal Information, such as your social security number or account number, in public forums, such as social media websites. Please carefully review the Terms of Use and Privacy Policies on these social media and other sites as they may be different than our own policies.

#### Adobe Device Co-Op

Key participates in the Adobe Marketing Cloud Device Co-op, which helps companies build websites, applications, and advertisements that seamlessly flow across all user devices (desktops, laptops, tablets, phones, smart watches, etc.). The Adobe Marketing Cloud Device Co-op recognizes which of your devices are linked (used by the same person) through the use of technology that includes cookies and your IP address. Visit the [Adobe website](#) for more information on cross-device tracking and/or to unlink your devices.

#### Social Media

Key provides information about our products, services, and community involvement on social media sites like Facebook and Twitter. Please keep in mind that any information you share on these social media sites is visible to all users. You should never post any Sensitive Personal Information (such as account number or social security number) on these sites. Please carefully review the Terms of Use and Privacy Policy on these sites as they may be different than our own policies.

#### Digital Session Recording

We use digital session recording to troubleshoot website and mobile performance and individual user issues, as needed. Sensitive Personal Information such as account number is masked within this session recording. You consent to the use of session recording when you agree to our online banking terms and conditions.

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## Changes to Key's Online Privacy Statement

Key's Online Privacy Statement is subject to change from time to time. When changes are made, Key will communicate these changes to you by posting the revised Statement on this page and adjust the "Last Updated" date. Any changes to this Statement will become effective on the date of posting unless indicated otherwise.

Last updated: January 1, 2023

## WIRELESS EXPRESS CONSENT AND IDENTIFICATION DISCLOSURE

By using the Site, you are accepting the terms of this Disclosure and acknowledge, authorize and agree as described herein:

### **Your agreement that we may contact you.**

You expressly authorize KeyBank National Association and its service providers, affiliates, agents, successors, assigns, and third party debt collectors to contact you on any of your mobile phone numbers, whether you provide those numbers to KeyBank (now or in the future) or whether KeyBank identifies those mobile numbers via other sources including, but not limited to, those obtained via skip tracing or those provided by third parties. This consent applies to all calls including text messages or telephone calls made via or using an automatic telephone dialing system, autodialer, and/or an automated or prerecorded voice. This consent applies to any and all accounts including, but not limited to, depository accounts, loans, lines of credit, credit cards, or other relationships you have with KeyBank (including business accounts upon which you are identified as a point of contact or an authorized user), including those you already have or any that you may obtain in the future, and this consent permits calls regardless of their purpose. These calls and messages may incur access fees from your cellular provider.

### **Important Information About Procedures for Opening a New Account**

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.