BREMER

Our privacy policies

Consumer privacy statement

Download a current copy of our <u>Privacy Statement</u> (pdf) at **bremer.com/privacy-statement** Download a current copy of our <u>Online Privacy Policy</u> (pdf) at **bremer.com/onlineprivacypolicy**

Online privacy policy

Bremer Bank, National Association and Bremer Insurance Agencies, Inc. ("Bremer") is committed to the privacy of your information. This Online Privacy Policy ("Privacy Policy") is meant to help you understand the information we collect, why we collect it, and how you can manage it. This Privacy Policy applies to our website at www.bremer.com (the "Site") and all related Bremer-branded products, services, communications, mobile services, mobile applications, and other applications (the "Services"), and is intended for a U.S. audience only. By using our Site, or by using our Services, you are acknowledging that you have read, understood, and accept this Privacy Policy.

In this Privacy Policy, any use of the words "you," "yours," or similar expressions refers to users of this Site and our Services, as well as any other individuals whose information we collect and process. References to "we," "us," "our" or similar expressions refer to Bremer.

This Privacy Policy does not extend to anyone whose personal information is not under our control or management, including data that is collected by other websites that you may visit before or after this Site, and which are not governed by this Privacy Policy. We are not responsible for the data protection or privacy policies of any other websites and accept no responsibility or liability for those policies. Please carefully check the policies of other websites and services you use before you visit or submit personal information.

1. Information we collect

1.1 INFORMATION WE COLLECT AND RECEIVE

In order for you to use our Site and Services, we need to collect and process certain types of information. Depending on your use of our Site and Services, Bremer may have collected the following categories of personal information in the last 12 months. We may have also collected personal information from the individuals at businesses with whom we interact in the business to business context. This may include:

- Personal Identifiers you provide to us by contacting us or that others provide to us, including, without limitation: any personal information you may provide to us when you email, fax, mail, or call us, such as name, phone number, employer, and any other details you provide in your communications. Bremer may also request your contact information for the purposes of having someone contact you for additional information, or in response to your request for information from us;
- Information you provide to us by completing forms on our Site or mobile application, for example, this may include your name, telephone number and address information, and any other information you may provide in the forms on our Site;
- Information you grant access to on your mobile device through our mobile application, such as your contacts or camera;
- Characteristics of protected classifications under state or Federal law, such as your race, ethnicity, sex, marital status, veteran or military status;
- Purchase information, such as products and services you have obtained and transaction histories;
- Audio, electronic and visual information such as call recordings and video recordings;
- Professional or employment related information, such as current and past job history;
- Sensitive information you provide us. For example, if you enroll in Online Banking, we may collect the information you provide to us throughout the process such as your Social Security number, driver's license, state identification card, or passport number, or your financial account, debit card, or credit card number in combination with any required security codes or password;
- Internet or other electronic network activity information, which includes information about the ways people visit and interact with our Site, such as traffic analytics, geolocation information, and other statistics;
- Information about your activity through our Services, including your device information (such as your IP address, the type of device or browser you use, and your actions on the Site); and

• Inferences we draw based on any of the information listed above to create a profile about you reflecting preferences, characteristics, attitudes or similar trends.

We will only use personal information to provide you with information, products, or services you have requested, or for other purposes set out in this Privacy Policy. We may use aggregate information from which individual identities have been removed for other purposes.

1.2 INFORMATION FROM CHILDREN

Bremer does not knowingly solicit or collect any personal information from anyone under 13 years of age, and children under 13 are not permitted to register for or use our Site or Services, including by subscribing to receive information from Bremer. Parents can contact customer support to access, change, or delete the personal information that has been submitted by a child. If we become aware that a child under the age of 13 has provided us with personal information, we will delete it. We do not knowingly sell personal information of consumers under 16 years of age.

1.3 COOKIES AND TRACERS

We use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across the Site and different Services and devices. You may be able to control certain cookies through your browser settings and other tools. Our Site does not respond to Do Not Track signals.

2. How we use information

Bremer may use the personal information we collect for the following business purposes:

- To provide and manage products and services, including maintaining or servicing accounts; providing customer service, processing, or fulfilling orders and transactions; verifying your information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services;
- To alert you about product updates, special offers, updated information and other news and services from Bremer;
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us;
- To market, personalize, develop and improve our products and services;
- To ensure our Site and Services are relevant to you and your interests;
- To help us create and publish content most relevant to you;
- To contact you in response to sign up forms, requests, or surveys;
- To audit related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- To help ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- For debugging to identify and repair errors that impair existing intended functionality of our Site and applications;
- To undertake internal research for technological development and demonstration;
- To undertake activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us;
- To manage any other business relationships we may have with you or your company;
- To engage in any other activities reasonably anticipated within the context of our ongoing business relationship with you, or otherwise to perform any contract between Bremer and you; and
- For any other purpose not otherwise prohibited by applicable law.

3. How information may be disclosed

Bremer will never sell or rent any of your personal information, and we will never disclose your personal information publicly without your consent. However, we may disclose your information with certain trusted third-party service providers to help us provide, improve, promote, or protect our products and Services. For example, we may partner with other companies to store your data to support delivery of our Services. Whenever we disclose data with third-party service providers, we require that they use your information only for the purposes we've authorized, and that they protect your personal information at least to the same standards we do.

We also reserve the right to disclose personal information when it is reasonably necessary to conduct our business; protect Bremer's legal rights and property or as part of a merger, acquisition, bankruptcy, or other

transaction; to comply with the law or law enforcement; or carry out any of the uses described above in this Privacy Policy. Otherwise, your personal information is never disclosed with any individual or other organization.

4. Protection of your personal information

We follow industry-standard practices to protect the data we collect and process. Bremer has therefore put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and secure the personal information that Bremer collects. Access to personal information will be restricted to our authorized personnel who require the information in order to perform their duties properly. In addition, access will be limited to only that information that is strictly necessary for the performance of those duties.

Remember, the safety and security of your information also depends on you. Where you have chosen, or where we have given you a username and password for access to certain parts of the Site or Services, you are responsible for keeping the username and password confidential. No method of transmission over the internet or electronic storage is completely secure, so Bremer cannot guarantee its absolute security.

5. Email notifications

We give you the ability to opt out of any marketing communications we send. For example, we may send you email relating to the Services we offer. You may also elect to receive certain marketing email communications, in accordance with your preferences, and from which you may opt out at any time. You can always opt out of receiving email information or mobile device notifications from Bremer (other than certain transactional or required communications), by sending us an email at contactus@bremer.com or calling us at 800-908-2265 stating your request. If we have sent you a promotional email or mobile device notification, you may send us a return email or mobile device communication asking to be omitted from future email or mobile device distributions.

6. California residents only

The following sections apply to those California residents who are considered consumers under the California Consumer Privacy Act of 2018; CA CIVIL § 1798.100, as amended (the "CCPA"). Certain exemptions apply to your rights and Bremer's obligations pursuant to the CCPA. These rights may not apply in certain situations depending on your relationship with Bremer and Bremer's other legal obligations and as otherwise provided for in the CCPA.

This policy does not address personal information collected for employment related inquiries or transactions. For additional details about the use of personal information for employment matters, please refer to the Bremer HR Notice at Collection and Privacy Policy.

Under the CCPA, personal information is defined as information that identifies, relates to, or could reasonably be linked with a particular California resident or household ("Personal Information"). Any other terms defined in the CCPA have the same meaning when used in this Privacy Policy. To understand our collection, use and disclosure practices with respect to Personal Information, please refer to the chart on the following pages.

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Parties with Whom Personal Information is Disclosed
Personal Identifiers	 Directly from you Individuals authorized to act on your behalf Our affiliates Service providers Government agencies and other publicly available sources Operating systems and platforms Data analytics providers 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance Helping to ensure security and integrity of Personal Information Debugging to identify and repair errors that impair intended functionality Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Undertaking internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufacture	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information Data analytics Providers Operating systems and platforms

Categories of Third

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Contact details such as telephone number and address, financial information such as account number and balance, credit and debit card numbers	 Directly from you Service providers Operating systems and platforms Government agencies and other publicly available sources 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance Helping to ensure security and integrity Debugging to identify and repair errors that impair intended functionality Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Undertaking internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufac	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information Data analytics providers Operating systems and platforms

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Characteristics of protected classification under California or Federal law	Directly from you	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Comply with legal and regulatory obligations Detect, investigate and prevent activities that may violate our policies or be illegal Enforce our terms and conditions and otherwise protect our rights and operations 	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information Operating systems and platforms

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Parties with Whom Personal Information is Disclosed
Commercial information such as products or services purchased, obtained or considered	 Directly from you Individuals authorized to act on your behalf Our affiliates Service providers Government agencies and other publicly available sources Operating systems and platforms Data analytics providers 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance Helping to ensure security and integrity of Personal Information Debugging to identify and repair errors that impair intended functionality Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Undertaking internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured, manufactured for, or controlled by us, and to improve upgrade, or enhance the service or device that is owned, manufactured, manufactured	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information Operating systems and platforms Data analytics providers

Categories of Third

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Biometric information	N/A	N/A	N/A
	Collection Sources N/A • Directly from you • Service providers • Operating systems and platforms • Our affiliates		
		protect our rights and operationsComply with legal and regulatory obligations	

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Geolocation	 Directly from you Service providers Operating systems and platforms 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance Helping to ensure security and integrity of Personal Information Debugging to identify and repair errors that impair intended functionality Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Undertaking internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufacture	 Service providers Our affiliates Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information Operating systems and platforms Data analytics providers

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Parties with Whom Personal Information is Disclosed
Audio, electronic, visual, or similar information	 Directly from you Our affiliates Service providers Operating systems and platforms 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance Helping to ensure security and integrity of Personal Information Debugging to identify and repair errors that impair intended functionality Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Undertaking internal research for technological development and demonstration Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufacture	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information

Categories of Third

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Professional or employment-related information	 Directly from you Individuals authorized to act on your behalf Our affiliates Service providers Government agencies and other publicly available sources 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Comply with legal and regulatory obligations Detect, investigate and prevent activities that may violate our policies or be illegal Enforce our terms and conditions and otherwise protect our rights and operations 	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information
Education information	 Directly from you Individuals authorized to act on your behalf Our affiliates Service providers 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Short term transient use meeting the conditions of the CCPA Comply with legal and regulatory obligations Detect, investigate and prevent activities that may violate our policies or be illegal Enforce our terms and conditions and otherwise protect our rights and operations Providing advertising and marketing services not including cross-context behavioral advertising 	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Inferences drawn to create a profile about a consumer	 Directly from you Our affiliates Service Providers Data Analytics Providers 	 To open, maintain and service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, or similar services. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance Helping to ensure security and integrity of Personal Information Short-term transient use meeting the conditions of the CCPA Providing advertising and marketing services not including cross-context behavioral advertising Undertaking internal research for technological development and demonstration Comply with legal and regulatory obligations Detect, investigate and prevent activities that may violate our policies or be illegal Enforce our terms and conditions and otherwise protect our rights and operations 	 Service providers Our affiliate Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information

Category of Personal Information Collected	Collection Sources	Business Purpose for Collection	Categories of Third Parties with Whom Personal Information is Disclosed
Sensitive personal information	 Directly from you Individuals authorized to act on your behalf Our affiliates Service providers Government agencies and other publicly available sources Operating systems and platforms Data analytics providers 	 To perform services, including maintaining or servicing accounts, customer service, processing orders and transactions, verifying customer information, processing payments, providing financing, analytic service, storage or similar services; To provide requested goods and services Help to ensure security and integrity Short term, transient use meeting the conditions of the CCPA To verify or maintain quality or safety of service or device or improve upgrade or enhance service 	 Service providers Our affiliates Government agencies Third parties to whom you authorize us, directly or indirectly, to disclose your Personal Information

Rights and requests under the CCPA

California residents may have certain rights regarding their personal information. Except where an exemption applies, these rights may include 1) the ability to request a copy of the information we have collected about you during the previous 12 months, as well as the right to review our data collection practices related to you; 2) the ability to request deletion of your Personal Information; 3) the ability to correct your Personal Information; 4) the ability to opt out of our selling or sharing of your Personal Information; 5) the ability to limit the use and disclosure of sensitive Personal Information; and 6) the right not to be discriminated against due to your exercise of any of the preceding rights. While these rights are not globally applicable, our customers and other individuals with whom we interact are entitled to access the Personal Information that we hold about them.

How to submit requests

To ensure that your Personal Information is accurate and complete, please contact us using the information below regarding any errors or updates affecting the Personal Information that we may hold.

You may also call us at 800-908-2265 or submit your request by completing the form found on **bremer.com** at <u>bremer.com/ccpa-privacy-request</u> to exercise any of these rights. To protect your privacy and security, Bremer may take reasonable steps to verify your identity before granting access to, correcting, or deleting data. As part of our verification procedures, we may request that you provide the following information to identify yourself: name, contact information, social security or individual taxpayer identification number, date of birth, cell phone number, email, user ID, business ID, password, account number, government issued ID, such as driver's license, state ID, passport or matricula card and/or answers to security questions that we have on file. In addition, for certain requests, we may require an extra layer of verification such as requiring you to sign a declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request. We will attempt to match information that you provide in making your request with other sources of similar information to reasonably verify identity.

Requests by authorized agents

A California resident who is considered a consumer under the CCPA may designate an authorized agent to make a request on behalf of the California resident by contacting us at the toll-free number or completing the form listed above. If you designate an authorized agent to make an access, correction or deletion request on your behalf we may require you to provide the authorized agent written permission to do so and require you to verify your own identity directly with us (as described above).

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As part of our verification process, we may request that the authorized agent provide:

- The authorized agent's name; contact information; social security or individual taxpayer identification number; date of birth; and government issued ID, such as driver's license, State ID, passport or Matricula Card.
- The name; contact information; social security or individual taxpayer identification number; date of birth; and the government issued ID of the California resident on whose behalf the request is being made.
- A document to confirm that the authorized agent is authorized to make the request such as a copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.
- For an authorized agent of a company or organization ("legal entity agent") making a request on behalf of a California resident:
 - The legal entity agents' active registration with the California Secretary of State.
 - Proof that the California resident has authorized the legal entity agent to make the request.
 - The name; contact information; social security or individual taxpayer identification number; data of birth; and government issued ID of the California resident on whose behalf the request is being made.
 - From the individual who is acting on behalf of the legal entity requestor, proof that the individual is authorized by the legal entity requestor to make the request.

Our response to requests

We will generally respond to your request for information within 45 days, unless, for reasons beyond our control, a longer response time is necessary, in which case, you will be advised accordingly. Please note that we may retain certain information as required by law or as necessary for our legitimate business purposes.

7. Questions, comments or complaints

If you have questions or comments about this Privacy Policy, or if you are not completely satisfied with this Privacy Policy or its application by us, we invite you to convey your concerns or suggestions to us at contactus@bremer.com or 800-908-2265. We will reply as quickly as possible and inform you of the steps, if any, that have been or will be taken in order to address your concern or implement the suggestion.

8. Updates and changes to this Privacy Policy

This Privacy Policy is effective from **June 27, 2023**. We may change this Privacy Policy from time to time, and the most current version will be available on our Site. You understand that by continuing to use our Site or Services after a change becomes effective, you have agreed to the most recent version of this Privacy Policy.