



PRIVACY NOTICE & MOBILE PRIVACY NOTICE

Effective October, 2025



I. PRIVACY NOTICE



Facts	What does MBG do with your personal information?
Why?	Financial companies choose how they share your 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 your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • social security number and income • account balances and transaction history • credit history and payment history
How?	<p>All financial companies need to share customers’ 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 MBG chooses to share; and whether you can limit this sharing.</p> <p>SMS opt-in consent and phone numbers collected for SMS purposes are not shared with any third parties under any circumstances.</p>

Reasons we can share your personal information	Does MBG share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing	<ul style="list-style-type: none"> • Visit us online at www.modern.bank.com and login to your account; or • Call us at 1.212.323.1125, Monday to Friday between 9:00am and 4:00pm ET, and have your name, full account number and zip code available. <p>Please note: 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 continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	<ul style="list-style-type: none"> • Visit us online at https://www.modernbank.com/privacy-policy/ or • Call us at 1.212.323.1125 Monday to Friday between 9:00am and 4:00pm ET.

Who we are	
Who is providing this notice?	Modern Bank, National Association (N.A.) doing business as MBG and MBG, Modern Banking Group.

What we do	
How does MBG protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We authorize our employees to get your information only when they need it to do their work, and we require companies that work for us to protect your information.
How does MBG collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or make deposits or withdrawals from your account • pay your bills or apply for a loan • use your credit or debit card <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"> • sharing for affiliate's everyday business purposes – information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include Modern Financial Inc & Subsidiary and Modern Banking Partners LLC.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. Our affiliates include such companies as retailers and membership clubs
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include categories of companies such as credit card issuers.

Other important information	
<p>VT: Accounts with a Vermont mailing address are automatically treated as if they have limited the sharing as described on the previous page. For joint marketing, we will only disclose your name, contact information and information about your transactions.</p> <p>NV: We are providing you this notice pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our Internal Do Not Call List by calling 1-212-323-1100, or by writing to us at 410 Park Ave, Suite 830, New York, NY 10022. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; phone: 702.486.3132; email: BCPinfo@ag.nv.gov.</p> <p>CA: We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transaction or to maintain your account.</p>	

II. MOBILE PRIVACY NOTICE

Facts	What does MBG do with your personal information?
Why?	<p>This mobile application may request access to certain features or data on your device—such as your location, camera, contacts, or other tools you use—to enhance your experience, improve our services, and help keep your account secure.</p> <p>It is important for you to understand that:</p> <ul style="list-style-type: none"> ▪ You'll be asked to grant permission before we access this information. ▪ You can choose to deny any request—your choice matters. ▪ You can change your permissions anytime in your device settings.
What?	<p>Our mobile application may request access to certain features and data on your device, including:</p> <ul style="list-style-type: none"> ▪ Location – to detect suspicious activity and help prevent fraud ▪ Camera – to scan documents or verify your identity ▪ Contacts – to simplify peer-to-peer payments (with your consent) ▪ Biometric data (e.g., fingerprint or facial recognition) – to enable secure login ▪ Device information – to enhance security and app performance
How?	<p>We take the protection of your personal information seriously. To prevent unauthorized access and use, we implement security measures that comply with federal law, including secure computer systems, encrypted data storage, and controlled access to our physical facilities.</p> <p>Your privacy and control over your data are important to us. You will always be asked for your explicit consent before we access features or information on your device, such as location, contacts, or camera. You can manage or revoke these permissions at any time through your device settings. We only collect data that is necessary to provide and secure your banking services, and we never sell your personal information.</p> <p>Any information collected through the mobile application is stored in accordance with applicable state and federal data retention laws. All data is handled in compliance with the General Data Protection Regulation (GDPR) and other applicable privacy laws.</p> <p>If you would like to know how long your data is retained or whether it can be deleted, please contact us directly.</p>
Questions?	<p>For questions about the information included in this Mobile Privacy Disclosure, please:</p> <ul style="list-style-type: none"> ▪ Call us at 1.212.323.1125 Monday to Friday between 9:00am and 4:00pm ET. ▪ You can also access the bank's Privacy Policy at https://www.modernbank.com/privacy-policy.