

This Internet Privacy Disclosure applies to your use of the websites and mobile device applications (“Websites”) of Frost Bank and its affiliates (“Frost” or “us”), regardless of whether you are using a desktop computer, laptop, smart phone, electronic tablet, or other electronic device. If you are a Frost customer, you should also review our [Customer Privacy Statement](#), which more broadly governs Frost’s handling of your personal information.

### **Information We Collect**

We may collect and store the following information when you use any of our Websites:

Contact and Content Upload Information. When you contact us using one of our online contact forms, we collect the messages you send as well as the personal information you provide, such as your name, phone number, and email address. If you upload a digital photo or customer testimonial for use on our Websites, we also collect the personal information you submit at the time.

Online Application and Services Information. We require certain personal information when you apply online for an account, loan or other service, or when you subscribe to an online or mobile banking service. In addition to basic details such as your name, email address, and phone number, we may require information to verify your identity, such as your social security number, driver’s license number, and place of employment. We may also require that you use “Additional Authentication Information” (“AAI”), such as tokens, one-time access codes, or other such similar mechanisms that we may require in our sole discretion in order to authenticate your use of the services. We may obtain reports from credit bureaus or other third parties in order to evaluate your applications.

Financial and Transactional Information. Our use of customers’ financial and transactional information is limited as set forth in our [Customer Privacy Statement](#) and in keeping with applicable law. We generate and collect information for our customers as necessary in order to run the day-to-day operations of the financial services that we provide. For example, in connection with online banking services, we generate and collect details pertaining to your accounts with us, including deposit, payment, and balance information, as well as instructions and other communications from you, such as instructions regarding wire transfers or joint account holders. We receive information concerning your transactions with others, such as checks that you deposit, and we also collect information from ATM and other third-party processor transactions. Further details and disclosures pertaining to our financial services may be found in the [Frost Online Banking Agreement and Disclosure](#), [Online Statement Delivery Agreement and Disclosure](#), [Deposit Account Agreement and Other Disclosures](#), and any other agreements or disclosures that may be presented for your agreement or acknowledgement in connection with the services that you may choose to obtain from us from time to time.

Log Data. When you access and use our Websites, we automatically record information concerning the device you are using and your activity on the Websites. This may include your device’s Internet Protocol (“IP”) address, your browser type, the types of information you search for and view on our Websites, locale preferences, location, identification numbers associated with your device, and your mobile carrier. If you arrived at one of our Websites by clicking on an advertisement, promotion, or search result on another website, we also take note of the web page you visited before you came to our Website.

Cookies. A “cookie” is a small data file that is transferred to your device. We use cookies to collect information in order to study, enhance and improve the use and capabilities of our Websites. We also use cookies to enable certain features of our Websites and to preserve your preferences and customize your

experience when you visit and return to our Websites. In addition, we and third parties acting on our behalf also use cookies to perform certain online advertising and analytics functions (discussed further below). Most browsers provide controls whereby you can choose to block receipt of cookies, delete cookies, or to be prompted before cookies are received. Please note that, if you delete or choose not to receive cookies from our Websites, the functionality of the Websites may be impaired.

Geo-Location Information. Many mobile devices permit applications to access real-time location-based information. Our mobile applications may collect such information, with your permission, in order to enhance the features and functionality of our Websites and financial service offerings. In addition, some of the information we already collect, such as IP addresses, may be used to estimate an approximate location of the device you are using to access our Websites.

## **Our Use of Information**

We use your information to verify your identity, provide you with quality customer service, evaluate your request for products and services, and improve our Websites and service offerings. We may be obligated by law to retain certain communications and other information concerning you. In addition, we may retain and use communications, transaction details, and identifying information (such as IP addresses) in order to maintain audit trails for security and anti-fraud purposes.

Frost does not share information concerning you with unaffiliated third parties for marketing purposes. However, we may use some of the information that we collect concerning you in order to present you with information concerning Frost services that may be of interest, and we may share that information within the Frost family of affiliates. For example, we may tailor our marketing efforts based on the types of financial services you use, the services in which you demonstrate an interest, and your use of our Websites.

## **Disclosure of Information**

We disclose information concerning you as necessary to run our everyday business, such as in connection with processing your transactions. We also may disclose information concerning you if required to do so by law or if we believe that such action is necessary to comply with a legal obligation or to protect and defend our rights or property, or those of our customers.

## **Online Tracking and Advertising**

Like many website operators, we use services offered by third parties (including, but not limited to, Google, Twitter, and Facebook) to advertise on third party websites based on search terms used by you and your visits to our Websites. We also receive relevant history and Website usage information and information about your receipt and use of marketing emails from us collected by those third parties, including search terms that direct visitors to our Websites, and we use that information to improve our Websites and for our own marketing purposes. Those third parties use cookies, web beacons, pixels, or similar technology to provide these services to us and to serve ads and customize search results based in part on your visits to our Websites. You can set preferences for Google services using the [Google Ad Settings](#) page, and you can opt-out of Google Analytics' use of data by installing a browser ad-on available [here](#). You can find information concerning personalized ads delivered by Twitter, as well as an opt-out from interest-based advertising, [here](#). Other tools for opting out of targeted advertising are the [Network Advertising Initiative \(NAI\) Opt-Out Page](#) and the [Digital Advertising Alliance \(DAA\) Consumer Choice Tool](#). Note that if you opt-out on the NAI page, or using the DAA tool, you will still see advertisements when you browse the Internet, but those advertisements may be less tailored to you and your interests. The Websites may also use the services of AdTheorent, a DAA member, whose opt out page can be found [here](#), and Lucky Orange, whose opt out page can be found [here](#).

Currently, various Internet browsers offer a "do not track" or "DNT" option that uses a DNT header to indicate the DNT preference setting on the browser. Because standards for DNT continue to evolve, we do not currently respond to browsers' DNT signals with respect to the Websites. We do not track your activity over time and across different websites or online services. The third parties that collect data through our Websites and marketing emails may combine the data with other information they collect about your online activities over time, on other devices, and on other websites or apps, if those websites and apps also use the same third parties. We do not permit third-parties to collect information from the Websites for other websites or for their own purposes, except on a limited basis in connection with the analytics and advertising discussed in the preceding paragraph.

## **Security**

Frost is committed to maintaining the security of your information, which is consistent with our core values and commitment to customer service. When you send information to us using the Internet, we use TLS (Transport Layer Security) or SSL (Secure Socket Layer) protocols to secure the transmission of information that you send to us over the Internet. Once we receive information, we store and protect it using industry-standard firewalls and other technology. Please remember, though, that no method of electronic transmission or storage is 100% secure.

## **Privacy of Children**

The Websites are not intended for use by children under the age of 13. Only the parent or legal guardian of a child under the age of 13 may utilize any services provided through the Websites that involve a password, user ID, or the provision of any other information by the user, even when a deposit or other account has been established on behalf of the child. Should you have additional questions or concerns, please contact our Internet Banking Service Center 1-877-714-4932.

## **Your Choices, and How to Contact us**

Customers can limit sharing of information within the Frost family of affiliates as described in the [Customer Privacy Statement](#). To limit sharing, call 800-513-7678, and ask to speak to a Frost customer service representative.

Should you have any questions or concerns regarding your information or privacy-related issues, please contact us via any of the methods listed directly below:

Via Mail

Customer Service/Privacy  
Frost Bank  
P.O. Box 1600  
San Antonio, TX 78296

Via Email

[webhelp@frostbank.com](mailto:webhelp@frostbank.com)

Via Telephone

(800) 513-7678

Upon your verifiable request using any of these methods, we will do our best to correct inaccurate information that we have concerning you.

## **Changes to this Privacy Disclosure**

We may need to make changes to this Privacy Disclosure from time to time, in order to reflect changes to our Websites or services, or to accommodate new technology or legal requirements and guidelines. Please check the links on our Websites to this Privacy Disclosure for any updates periodically. Information collected in connection with your use of our Websites after any changes to this Privacy Disclosure become effective will be handled in accordance with the revised Privacy Disclosure.