

# Website Privacy Policy

Effective as of January 1, 2020

This Privacy Policy is designed to help you understand how First National Bank of America and its related organizations and affiliates, including First National Acceptance Company, Rose Land and Finance and Rose Acceptance Company (collectively “FNBA”, “we”, “us” or “our”), collects, uses and shares personal information collected through our websites. We value your privacy, and we will not share your personal information with third parties except as described in this Privacy Policy without your consent.

**BY USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS OF THE PRIVACY POLICY, PLEASE DO NOT USE THIS WEBSITE OR PROVIDE US WITH YOUR INFORMATION.**

## What this Privacy Policy Covers

This Privacy Policy applies to our collection, use and sharing of your personal information (a) when you visit our websites at [fnba.com](http://fnba.com), [fnacusa.com](http://fnacusa.com), [fnacbrokers.com](http://fnacbrokers.com), or [roselandco.com](http://roselandco.com) (the “Sites”), (b) receive our communications or participate in our online or offline activities or events, (c) create an account on our website, and (d) that we obtain from third parties such as resellers, database vendors, content publishers and suppliers.

This Privacy Policy applies only to information gathered on and through the Site and does not apply to any other information or websites not owned or operated by FNBA or information collected by FNBA by other means.

## CHANGES TO PRIVACY POLICY

### PERSONAL INFORMATION WE COLLECT

### HOW WE USE YOUR PERSONAL INFORMATION

### HOW WE SHARE YOUR PERSONAL INFORMATION

### YOUR CHOICES

### COOKIE POLICY

### OTHER IMPORTANT PRIVACY INFORMATION

### NOTICE TO CALIFORNIA RESIDENTS

#### COLLECTION NOTICE

#### INFORMATION COLLECTED & PURPOSE OF COLLECTION

#### DO NOT SELL MY PERSONAL INFORMATION

### CONTACT US

### CHANGES TO PRIVACY POLICY

## Personal Information We Collect

Information You Give Us. Personal information you may provide through the Site or otherwise communicate to us includes:

- *Contact information.* We collect information about you when you provide contact information to us via email, mail, or through the Site, including as a result of creating an account, or registering for a contest. This information may include your first and last name, email address, mailing address, phone number, and credit card information.
- *Sensitive personal information.* We collect information that may be considered sensitive, such as your tax identification number, passport number or social security number, in connection with our product and service offerings.
- *Feedback and correspondence.* We may collect information about you when you request information, respond to surveys, or otherwise correspond with us.
- *Other information.* We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Privacy Policy.

Information We Get From Others. We may obtain additional information about you from third party sources, such as service providers, vendors, social media sites, and advertising agencies to provide you with more relevant information about our products and services.

Information Automatically Collected. Our servers and third party service providers may automatically record certain information about how you use the Site, such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy, below, for more information.

Statistical Analyses. We use service providers like Google Analytics to help us gather statistical information about the visitors to our Site and how they use the Site on an anonymous, aggregate basis. However, we will not associate this data with your personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental request or to comply with law. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services. Depending on the type of browser and device that you use, you may have the ability to control the type of information that Google Analytics use. To understand how Google Analytics collects and processes data, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). We reserve the right to license or sell aggregate, de-identified information about the visitors to our Site, but this information will not contain your personal information or otherwise be individually identifiable.

Sensitive Personal Information. We may collect some sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, gender, and criminal background) through the Site as a result of our evaluation process for providing products and services, including loans and financial and investment services. For more information about our activities related to such personal information, please [click here](#).

In collecting this sensitive personal information, FNBA respects individual privacy, protects against unauthorized access to or use of information, and complies fully with all laws and government regulations in the collection, use, storage, display, distribution and disposal of such information. Authorized uses of sensitive information within FNBA are limited to uses which are necessary to: a) meet our legal and regulatory requirements; or b) facilitate access to services, transactions, facilities and information.

## How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described to you in this Privacy Policy or at the time of collection:

To Provide the Site and Communicate With You. We use your personal information:

- to provide, maintain and improve the Site;
- to better understand your needs and interests, and personalize your experience with the Site;
- to register you for events and contests;
- to respond to your requests, questions, comments, and feedback; and
- to perform website analytics and database management services.

To Send You Marketing Communications. We may send you newsletters, promotions or other marketing communications, but you may opt out of receiving them as described in the Your Choices section below.

To Create and Maintain Your Account. In order to utilize some of the services provided through the Site, you must create an account using certain personal information, including your name and email address. You have choices about the information included in your account profile. You do not have to provide additional information on your profile; however, additional profile information may help you get more from our services.

To Advertise To You. We may use your personal information to manage and serve ads in the Site or on third party sites and to tailor ads to your interests and browsing history. In addition to the cookies utilized by us on this Site, FNBA may allow trusted third parties to place advertisements for our services on sites and applications operated by others. These third parties may use cookies and web beacons to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests both on our Site and other sites and applications that you may visit (see our Cookie Policy below). To support this interest-based advertising solution, we and the companies we have contracted with may use anonymous information about your visits to our and other websites and applications. The information collected and used by this process is always anonymous and does not enable any third party to identify you individually. You can learn more about interest-based advertising and opt out of such advertising from certain companies at [aboutads.info](http://aboutads.info).

For Compliance, Fraud Prevention and Safety. We may use your personal information as we believe appropriate to: (a) investigate or prevent violation of the law or your agreements with us; (b) protect our, your or others' rights, privacy, safety or property (including by prosecuting and defending legal claims); (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; and (e) where permitted by law in connection with a legal investigation. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons.

With Your Consent. In some cases we may ask for your consent to collect, use or share your personal information.

## How We Share your Personal Information

We may use third parties to help us design and operate the Site, provide services to support the Site, process your information, and provide promotional and marketing activities on our behalf. For example, we may hire a company to run certain website applications, help us analyze our data, process your loan request, or send information on our behalf about services and events in which you may be interested. Unless otherwise indicated at the time we collect your information, if we allow third parties to access the personal information we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Privacy Policy.

We do not share your personal information with third parties without your consent, except in the following circumstances:

FNBA-Related and Affiliated Organizations. We may share your personal information among our affiliates and related organizations, including First National Acceptance Company, Rose Land and Finance and Rose Acceptance Company, for each party's business purposes provided such use is consistent with this Privacy Policy.

Service Providers. We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities and to promote our services to you.

Business Partners. We may share your personal information with our business partners who offer a joint service and product to you, such as our mortgage brokers.

Security, Compliance, Fraud Prevention, Safety; Compliance with Law. We may disclose your personal information as we believe appropriate to government or law enforcement officials or private parties for compliance, fraud prevention and safety purposes and for compliance with law.

Business Transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

## **Your Choices**

Opt Out of Marketing Communications. You may opt out of marketing-related emails by changing the communication preferences in your account settings or by following the opt-out prompt in the email. To opt out of other forms of marketing communications, please contact us using the contact information provided at the end of this Policy.

Opt Out of Other Communications. You may opt out of email notifications by changing the communication preferences in your account settings.

Consequences of Not Providing Personal Information. You are not required to provide all personal information identified in this Privacy Policy to use our Site or to interact with us offline, but certain functionality and services will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

## **Cookie Policy**

What are Cookies? Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies set by the website are called “first party cookies.” Cookies set by parties other than the website are called “third party cookies.” Third party cookies enable third party features or functionality, such as advertising or website analytics, to be provided on or through the website. The parties that set these third party cookies can recognize your computer or device both when it visits the website in question and also when it visits certain other websites and/or mobile apps.

What Cookies and Other Tracking Technologies do We Use? We use several different kinds of cookies on this Site, including strictly necessary cookies, which are cookies that are necessary for the Site to function and cannot be switched off in our systems; performance cookies, which allow us to count visits and traffic sources so we can measure and improve the performance of our Site; and functional cookies, which enable the Site to provide enhanced functionality and personalization. Specifically, the cookies we use are:

<b>Name</b>	<b>Domain</b>	<b>Category</b>
__unam	roselandco.com	Performance
pa_uid	fnba.com, fnacusa.com, fnacbroker.com	Performance
pa_yahoo_ts	fnba.com, fnacusa.com, fnacbroker.com	Advertisement
personalization_id	fnba.com, fnacusa.com, fnacbroker.com	Advertisement
smarter-navigation[query]	roselandco.com	Functional
smarter-navigation[title]	roselandco.com	Functional
smarter-navigation[url]	roselandco.com	Functional
uid	fnba.com, fnacusa.com, fnacbroker.com	Advertisement
__unam	roselandco.com	Performance

Cookies are not the only way to track visitors to a website. We may use similar technologies from time to time, like web beacons (sometimes called “tracking pixels” or “clear gifs”). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Sites. These technologies often depend on cookies to function properly, and so disabling cookies may impair their functioning.

If you sign up to receive our e-mails, we will also use cookies in conjunction with these emails. When your browser downloads any graphic content in the e-mail, we will also place a cookie on your computer that will tell us if you come to our website at a later date.

Third-Party Cookies. In addition to our own cookies, we collaborate with various third-party service providers who also use cookies to help us optimize our website and understand more about the visitors to our website. For example, we use Google Analytics to provide us with demographic information about our visitors and to help us analyze how people use our website. Currently, our third-party service providers include: [Google Analytics](#), [Perfect Audience](#), and [WordPress\[KRH6\]](#). To learn more about how such parties use cookies, please click the links above or visit their respective websites to view their privacy policies.

How Can You Disable Cookies and Other Tracking Technology? Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what

cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com](http://www.youronlinechoices.com).

Some Internet browsers also may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## **Other Important Privacy Information**

Third Party Sites and Services. The Site may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications or services, and we are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more.

Security. The security of your personal information is important to us. We take a number of organizational, technical and physical measures that are designed to protect the personal information we collect. For example, our Site features a GlobalSign-issued Certificate for the Internet Service Provider hosting our Site, Transport Layer Security (TLS) protocol for data encryption, and a router and firewall to regulate the inflow and outflow of server traffic. However, security risk is inherent in all internet and information technologies and we cannot guarantee the absolute security of your personal information.

International Data Use. We are located in the United States and have affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country.

Verifying, Changing, and Deleting Your Information. If you have created an account through our Site, you can access, review and manage many changes yourself via your account, including updating your profile information and changing your communication preferences. You can contact us as detailed below and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate. You can also request that we erase or delete all or some of your personal information or otherwise object to, limit, or restrict the use of such information (if we have no legal right or legitimate business interest in retaining such information).

### Children.

The Site is not intended for use by anyone under the age of 13, nor do we knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, you should not attempt to use the Site or send any information about yourself to us.

## **Notice to California Residents**

The following section applies to California residents.

*Shine the Light.* Under California’s “Shine the Light” law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes. To make a request [click here](#), email us at [CAPrivacy@fnba.com](mailto:CAPrivacy@fnba.com), or call us at 1-855-828-7229 and specify you are making a Shine the Light request.

*California Consumer Privacy Act* (“CCPA”). The CCPA creates consumer privacy rights and requires businesses to make disclosures about their privacy policies and practices. Pursuant to the CCPA, both our privacy practices and your privacy rights are discussed in detail in the following information.

Personal Information We Collect. We collect your personal information when you interact with our Site or otherwise communicate with us. For the purposes of this Privacy Notice, “personal information” means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device.

We have collected the following categories of personal information covered by the CCPA from consumers within the past 12 months, and have used it for the following business purposes:

<b>Category of Personal Information Collected</b>	<b>Business Purpose of Collection</b>
Identifiers, including real name, signature postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, tax identification number, social security number, driver’s license or state identification number, passport number, telephone numbers.	To market and provide you our services and communicate with you. In addition, we collect your IP address anonymously to provide you more relevant content, track original Site visits, and optimize your Site experience.
Financial information, including payment history; information relating to the individual’s creditworthiness	To market our services to you.  Note that information collected in this category is generally subject to the Gramm-Leach-Bliley Act, and is addressed separately <a href="#">here</a> rather than this Privacy Policy.
Commercial information, including records of personal property, products or services purchased, leased, rented, obtained or considered, or other purchasing or consuming histories or tendencies; real property purchased, leased or rented.	We collect publically-available commercial information to market our services to you.
Internet or other electronic network activity information, including browsing history, search history, and information regarding an individual’s interaction with an internet Web site, application or advertisement	To provide you more relevant content, track original Site visits, and optimize your Site experience
Geolocation Data	To support website functionality and identify traffic patterns.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible business purposes without providing you notice.

Sharing Your Information. We may disclose or sell some of your personal information to third parties.

We disclose the following categories of personal information covered by the CCPA for a business purpose:



<b>Category of Personal Information Disclosed</b>	<b>Category of Third Parties with Whom Information is Disclosed for our Business Purposes</b>
Identifiers	Service providers, including our customer relationship management (CRM) solution providers, Site service providers, data analytics providers, and social networks
Internet or other electronic network activity information and Geolocation Data	Data analytics providers, marketing service providers

We sell the following categories of personal information covered by the CCPA:

<b>Categories of Personal Information Sold</b>	<b>Category of Third Parties with Whom Information is Sold</b>
Identifiers, financial information, commercial information, and Internet or other electronic network activity information	We share this information with our affiliates for their business and marketing purposes. We do not otherwise make this information available to third parties.

Please note that we may collect, use and share additional personal information about you that is governed by laws other than the CCPA, such as the Gramm-Leach-Bliley Act, and that our activities related to such personal information are not disclosed here. [Click here](#) to learn more about our privacy practices related to such personal information.

Source of Personal Information. To read a more detailed disclosure of the personal information we collect, see the section entitled “Personal Information We Collect” above. More broadly, we obtain the categories of personal information that are listed above in the following ways:

*Directly from You.* We collect the following categories of personal information directly from you: identifiers, financial information, and commercial information. We collect this information when you:

- Create a personalized account with us.
- Sign up to receive promotional emails or text messages.
- Provide your contact information to us.
- Submit a request to us.
- Participate in one of our contests or surveys.
- Interact with our social media pages.

*Passively.* We collect IP addresses, internet and other electronic activity information, and geolocation data from you when you:

- Install and use our mobile application.
- Visit and navigate our Site on any device.
- Click on sponsored links or third-party advertisements.
- Receive or interact with our communications and Site that may contain cookies.

*From Third Parties.* We may receive identifiers, commercial information, and financial information about you from other sources. For example, we get information from:

- Our business partners, including online advertising networks.
- Facebook Advertising



- Companies that provide information to supplement what we already know about you, including data brokers.

Your Rights. The CCPA gives you certain rights regarding your personal information:

- *Right to Know.* You may request no more than twice in a 12-month period that we provide you with copies of specific personal information we have collected, sold, or disclosed about you. However, under California law, we cannot provide you with certain sensitive information, despite your request (for example, we will not send you copies of your social security number even if it is something we collected).
- *Right to Delete.* You may request that we delete certain personal information we have collected about you, with certain exceptions.
- *Right to Opt Out.* You may opt out of the sale of your personal information to third parties.

Exercising Your Rights. To exercise your rights above, please submit a request to us by clicking [here](#), by emailing us at [CAPrivacy@fnba.com](mailto:CAPrivacy@fnba.com), or by calling us at 1-855-828-7229. Please describe your request with sufficient detail so we can properly respond to your request. As part of your request, please specify which right you are exercising and be prepared to provide your name and contact information. We may ask for additional information to verify your identity. The information you provide in your request and any follow up information we ask for from you will be used solely to verify your request.

After receiving your request, we may need to contact you for further information and will notify you if your request has been granted or declined, or if an exception applies to your request.

Only you or an individual designated as your authorized agent to act on your behalf may make a request related to your personal information. You may also make a request on behalf of your minor child.

We may not discriminate against you if you choose to exercise your rights.

Responding to Your Rights Request. We will try to respond to your request within 45 days. If we need more time, we will contact you with the reason we need more time and the extension period. In response to your request to know, we will only disclose the information we have collected in the 12 months prior to our receipt of your request. Our response will also explain the reasons we cannot comply with any request, if applicable.

We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

## **How to Contact Us**

First National Bank of America and affiliates  
PO Box 980  
East Lansing, MI 48826  
United States of America

Email: [CAPrivacy@fnba.com](mailto:CAPrivacy@fnba.com)  
Phone: 1-855-828-7229

## **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make changes to this Privacy Policy, we will post them on the Site and indicate the effective date of the change. If we make material changes to this Privacy Policy we will notify you by email or through the Site.

This Privacy Policy was last updated January 1, 2020.