



# Digital and Mobile Privacy Notice

Your privacy is important to us. This Digital Privacy Notice explains how Columbia Banking System, Inc. ("COLB") and its subsidiaries, and affiliates (collectively, "Columbia", "we", "us" or "our") collect, share, use, and protect information when you visit or use this online service and any other online services offered by us that link to or reference this policy (collectively, our "online services"). This policy covers many online services, including all our websites and our mobile apps, and social media sites or pages, as well as any interactions you may have while viewing content provided through one of our digital advertising campaigns.

As you review this Digital Privacy Policy, here are a few general principles to keep in mind:

- Our online services are intended for a U.S. audience. If you visit or use one of our online services, your information may be transferred or processed in the United States of America.
- We do not knowingly collect personal information from children under 13 without parental consent. See the Children's Online Privacy Protection Act (COPPA) section below.
- If you have a financial product or service with us, we may use and disclose information that we collect from or about you in accordance with our Privacy Notice, which offers you certain choices with respect to the use and sharing of your personal information.
- Our Mobile (defined below) applications and our social media sites or pages may have additional terms and conditions about the privacy of your information. Please review the privacy policy for the specific online service you are using.
- If you have questions after reviewing this policy, please visit [Frequently Asked Questions](https://www.umpquabank.com/privacy/frequently-asked-questions/) at <https://www.umpquabank.com/privacy/frequently-asked-questions/>.

## Online Collection and Use of Personal Information

### Collection

When you visit or use our online services, we may collect personal information directly or indirectly from or about you such as your name, email address, postal address, telephone number(s), account numbers, location information (for example, a zip code to help you find a nearby ATM), username and password or other unique identifiers. We may also collect payment card information, Social Security Numbers (SSN), driver's license numbers (or comparable) or other unique identifiers when you provide such information while using our online services and where we believe it is reasonably necessary for ordinary business purposes.

### Use

We may use personal information:

- To respond to your inquiries and fulfill your requests.
- Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, online services, customer service, payments and collections, and account notifications.

- Establish your account(s) and/or preferences, process transactions for our products and services including checking accounts, credit cards, loans, investment accounts, as well as additional products for businesses such as commercial financing and payment services.
- To provide important information regarding the products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information.
- Enable information security and anti-fraud operations, verify your identity, as well as credit, underwriting, and due diligence.
- Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims.
- Enable the use of service providers for business purposes.
- For compliance, fraud prevention, and safety purposes, including protecting the security of account and personal information.
- Comply with policies, procedures, and contractual obligations.
- Collect information through our social media pages and other online interactions with you to assist in verifying your identity and account status. We may combine this online information with information collected from offline sources or information we already have.
- Personalize, develop, as well as improve our products and services.
- Support customer relationship management.
- to personalize your experience on our websites and enhance websites.
- to allow you to participate in surveys and other forms of market research, sweepstakes, contests, and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared.
- Understand how you use our websites, mobile applications, and other digital properties (collectively, the "Sites").
- The methods and devices you use to access our Sites.
- Make improvements to our Sites.
- Conduct research and analysis, identify usage trends, determine effectiveness of promotional campaigns, and to drive product and services innovation.
- Conduct research and analysis, identify usage trends, determine effectiveness of promotional campaigns, and to drive product and services innovation.
- Send you marketing and advertising communications about our products and services, tailored to your interests or more general in nature.
- Information stored on your device, such as location, camera, contacts, or other features you are enrolled in to enrich and simplify your own user experience and improve our services, as well as provide additional security to protect your account.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

## **Additional Sources of Information**

We may also collect information about you from additional online and offline sources including from third parties, outside companies or organizations that interact with us in connection with the services we perform and products we provide. We may combine this information with the personal and other information we have collected about you under this Digital Privacy Notice.

## **Umpqua Mobile**

For your convenience, we offer you the ability to access some of our products and services through mobile applications and mobile-optimized websites. When you interact with us through our Mobile applications, we may collect information such as unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device.

<b>FACTS</b>	<b>WHAT DOES COLUMBIA BANKING SYSTEM, INC. DO WITH YOUR PERSONAL INFORMATION FROM THE MOBILE APPLICATION</b>
<b>Why?</b>	<p>The mobile application requests access to information stored on your device such as location, camera, contacts, or other features you are enrolled in to enrich and simplify your own user experience and improve our services, as well as provide additional security to protect your account.</p> <p>It is important for you to understand that:</p> <ul style="list-style-type: none"> <li>• Before granting access to this information, you will be prompted to give the application that permission.</li> <li>• If you do not wish to grant that permission, you may decline.</li> <li>• If you later change your mind, those permissions can be updated in your device's settings.</li> </ul>
<b>What?</b>	<p>Some examples of information your app will request access to are:</p> <ul style="list-style-type: none"> <li>• Location</li> <li>• Contacts</li> <li>• Camera</li> </ul>
<b>How?</b>	<p>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.</p> <p>The application information is retained in accordance with state and federal record retention laws. Please contact us to determine specific timeframes for your personal stored information and if that information may be deleted.</p>
<b>Questions?</b>	<p>Please contact Columbia Banking System, Inc. Privacy toll-free, at 1-833-427-5227 regarding questions about the information included in <b>this Mobile Privacy Disclosure</b> or questions about this application.</p> <p>You can also access our full Privacy Notice <a href="#">here</a>.</p>

## Disclosure of Information

We may share the information we collect from and about you with our affiliates and other third-parties, service providers and contractors. For example, we may share your information with:

- **Affiliates.** We may disclose your personal information with our subsidiaries, and affiliates, for purposes consistent with this Privacy Notice.
- **Service Providers and Contractors.** We may disclose personal information with third-party service providers and contractors subject to appropriate confidentiality and use restrictions, as part of providing products and services, completing transactions, supporting everyday operations or business management and development.
- **Advertising or Analytics Providers.** As mentioned above, we may use personal information in support of our: (1) advertising and marketing efforts, including to serve interest-based advertisements across the Internet; and track and categorize your activity, interests and device(s) used over time on our websites and applications, and on third-party websites and mobile applications; and (2) research and analytics efforts, including to better understand your use of our websites and applications to improve those technologies and optimize your experience and interactions. To do this, we may disclose your information with certain third-party advertising or analytics providers (collectively, "Analytics and Advertising Providers") through our use of Collection Technologies. These Analytics and Advertising

Providers may use Collection Technologies on our digital properties to collect and store information about you and your use of our websites, applications, and other digital properties.

- **Representatives of California Residents.** We may disclose personal information with companies or individuals that represent California residents, such as accountants, financial advisors, or individuals with power of attorney.
- **For Routine or Required Reporting.** We may disclose personal information for routine or required reporting, including to consumer reporting agencies or other third parties
- **Professional Advisors.** We may disclose your personal information to professional advisors, such as lawyers, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Business Partners.** We may disclose personal information with our business partners, such as those companies that we offer co-branded services, products, or programs with.
- **For Risk, Legal, and Compliance.** We may disclose your personal information with third parties, including regulators, government agencies, and law enforcement, for the risk, legal, and compliance purposes described in the section above.
- **Business Transfers.** We may transfer or disclose some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.
- **Your Consent or Instruction.** We may disclose your personal information in situations where we have your consent or instruction to do so.
- We may also disclose your personal information (1) for risk, legal, or compliance purposes; (2) to our Professional Advisors; (3) because of a business transfer (or potential business transfer); or (4) based on your consent or instruction.

Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our [Privacy Notice](#) and our [Privacy Notice for California Residents](#).

We may disclose anonymous or aggregated information with third parties to help deliver products, services, and content that are tailored to the users of our online services and for other purposes.

### **Understanding Cookies, Web Beacons and Other Tracking Technologies**

Columbia Banking System, Inc., our services providers, and third parties engaged on our behalf may use cookies, pixel tags, or similar tracking technologies (collectively, "Collection Technologies") to gather personal information when you use, access, or otherwise interact with our websites, mobile applications, or other digital properties. While we do not disclose your personal information in exchange for money, our use of these collection technologies may be considered a "Sale" or "Sharing" under California Law. California residents have the right to opt out of such selling/sharing activity. For more information about our use of collection technologies, please visit our [\(Link to Digital/Mobile Notice\)](#). We may use the information for business purposes such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

"Cookies" are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns, and measure site or campaign engagement.

Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation but may not be managed in your browser in the same way. For more information on managing Local Shared Objects, [click here](#).

*Bear in mind that because cookies are stored by your browser, if you use different browsers on your computer, or multiple computers and devices that have browsers and you do not wish to have cookies collect information, you will need to opt out from each browser on each of the computers and devices that you use. Please note that even if you opt out of those preferences, you may still receive advertisements from us; they just won't be customized based on your web-browsing activities on third-party websites.*

### **Linking to Third-Party Websites**

Columbia Banking System, Inc. may provide links to websites that are owned or operated by other companies (“third-party websites”). When you use a link online to visit a third-party website, you will be subject to that website’s privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

### **Children’s Online Privacy Protection Act (COPPA)**

The Federal Trade Commission adopted a regulation (16 CFR 312) to implement the Children's Online Privacy Protection Act (COPPA), which governs the collection and use and/or disclosure of personal information from and about children on the internet.

We do not operate a website or online service directed to children that collects or maintains personal information about children under the age of 13 or operate a general audience website or online service and knowingly collect or maintain personal information online from a child under the age of 13.

For more information about the Children’s Online Privacy Protection Act (COPPA), visit the FTC website: [www.ftc.gov](http://www.ftc.gov).

### **Security**

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your SSN) to us.

### **Updating Your Information**

Keeping your account information up to date is very important. You may review or update certain account information by logging in and accessing your account(s). If you cannot change the incorrect information online, or you prefer to request changes offline, please use the [Contact Us](#) option on our site or call or write to us using the contact information listed on your account statements, records, or other account materials. You can also speak to one of our branch representatives, your financial advisor, or your digital banking representative.

### **Changes to this Digital Privacy Policy**

We may change this Digital Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new “Last Updated” date. Any changes to this Digital Privacy Policy will become effective when posted unless indicated otherwise.