

The Commerce Bank of Washington Online Privacy Statement

Effective Date: January 1, 2014

The Commerce Bank of Washington, N.A. (referred to in this Online Privacy Statement as “TCBWA,” we, our, or us) is committed to respecting your privacy, and we take the responsibility of protecting your personal and financial information seriously. This Online Privacy Statement (“Statement”) applies to www.tcbwa.com, including the web sites, features, applications, online services and functionality available via www.tcbwa.com that post a link to this Statement, whether accessed via computer, mobile device or otherwise (collectively, the “Site”), and explains how TCBWA collects, uses, and shares information from or about you when you visit the Site. The Site is owned or controlled by TCBWA and TCBWA is the commercial operator of this Site, although software, hosting and other functions and content may be provided by TCBWA’s service providers (“Service Providers”) or other companies affiliated with TCBWA or merely in a business relationship with TCBWA. PLEASE CAREFULLY READ THIS STATEMENT BEFORE USING THE SITE, AS IT AFFECTS YOUR LEGAL RIGHTS AND OBLIGATIONS. This Statement does not apply to any other web sites or any offline activities by TCBWA (unless specifically stated). In addition to this Statement you may receive and be covered by the TCBWA Consumer Privacy Notice, as well as other privacy disclosures that we provide to you with account opening documents.

This Statement describes the types of information TCBWA collects from visitors to the Site and what we do with this information. This Statement applies solely to information that visitors provide through our Site. This Statement does not apply to other data we collect, including data collected on other sites, such as separate sites operated by TCBWA, our affiliates or business partners, or information visitors may provide to us through e-mail or other means.

Information Collection

When you visit our Site, we collect the IP address of the device you use to connect to the Internet. In addition, we gather information such as what browser you’re using, the type of operating system you have, and which site you came from. This information helps us tailor your online experience to best match your device.

In addition to the above information, we may also gather personal information that you provide to us, including, but not limited to, your name, address, social security number, date of birth, phone number, and email address. We may gather such information, for example, when you use the Site to participate in TCBWA’s events or promotions (including, without limitation, webinars and online surveys), or otherwise provide information requested on the Site.

Collecting this personal information enables us to offer you online experiences and products that we believe may help you with your financial needs. We use this information to better tailor and personalize our service and marketing communications with you, both online and offline. We may also use your personal information for our business purposes (for example, to develop new products, improve the Site, and analyze data collected through the Site), as well as for risk management and for legal compliance purposes.

Some third parties may collect your personal information when you visit this Site.

Cookies

Cookies are pieces of information stored by your Internet browser directly on the computer you are using. Cookies are widely used and most browsers are set up to accept them automatically. The information they gather helps us improve your online experience by allowing us to:

- Offer you more relevant products and services;
- Collect technical and navigational information, such as browser type, time spent on our Site and pages visited;
- Monitor viewing and responses to our advertisements.

Cookies and other technologies provide us the capability to monitor the use of our Site so we can continually improve the design and functionality to better serve you. If you would prefer, you can choose to not accept cookies. (Follow your browser’s instructions for disabling or deleting cookies.)

Please note: If you choose not to accept cookies from our Site, you may not be able to access all or part of the Site, or benefit from the information and services offered. If you choose not to accept cookies, you will still see advertisements on our site; however, they will not be tailored to our perception of your interests or needs.

Flash Objects

TCBWA uses Flash objects (also known as “Local Shared Objects”) in two ways:

- For the online authentication process, we use Flash objects to assist in recognizing you and your computer when you come back to our Site.
- For pages using Adobe® Flash® content (moving content in demos and tutorials), Flash objects are used to determine your browser type and version of Adobe Flash allowing you to view the content.

Flash objects are not deleted when cookies are deleted. Deleting Flash objects from our Site may cause you to be unable to access or use all or part of the Site or benefit from information or services offered. If you would like to delete Flash objects, please follow the instructions provided by Adobe.

Additional Technologies

We may use third party advertising service providers who may advertise on our Site using web beacons. A web beacon is placed on a web page to set HTML cookies and can capture information such as IP address, time, web browser, time zone, and domain. We may also implement additional technologies to capture other data. This information helps us understand how customers use our Site.

Online Promotions, Sweepstakes and Surveys

On occasion, you may have the opportunity to participate in online surveys or sweepstakes on our Site. Your participation in online surveys, sweepstakes or promotions is not required. You do not have to complete online surveys, sweepstakes or promotions; however, online surveys are used to gather information to better serve you. Using the information you provide to us allows us to inform you of accounts and services from TCBWA.

Protecting Children’s Privacy Online

We feel strongly about protecting the privacy of children. As such, we do not knowingly collect personally identifiable information from children under 13 without parental consent. This Site is not directed to or intended for individuals under 13 years of age. If you are under the age of 13, please do not provide personally identifiable information of any kind whatsoever.

Information Use and Sharing

Unless otherwise described in this Statement, we will use and share information that we collect through the Site in accordance with the TCBWA Consumer Privacy Notice, available at www.tcbwa.com. We will only provide third parties with the minimum amount of information necessary to complete the requested service.

When you provide information to us through our Site, we may share your information with Service Providers we have retained to perform services on our behalf. These Service Providers are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may disclose your information (i) if we are required or permitted to do so by law or legal process, (ii) to law enforcement authorities, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.

We reserve the right to transfer any information we have about you in the event that all or part of TCBWA or all or part of its assets are acquired by, merged with, sold to, or otherwise disposed of to one or more third parties (including, without limitation, in the event of bankruptcy).

California Residents

TCBWA does not share California residents' personal information with affiliates or third parties for the affiliates' or third parties' direct marketing purposes.

Information Security

We have policies restricting access to nonpublic personal information about you to those employees and Service Providers who have a need to know such information (e.g., to process your transactions or provide services to you). We and our Service Providers have implemented and maintain physical, electronic, and procedural safeguards designed to protect against loss or unauthorized access, disclosure, alteration or destruction of the information you provide on our Site.

Maintaining Accurate Information

We have procedures in place that help us to maintain the accuracy of the personally identifiable information we collect. Please contact your customer service representative at (206) 292-3900 if you believe that our information about you is incomplete, out-of-date, or incorrect. You may also login to your account online to update your email address.

To update/change your email address within online banking, follow these steps:

- Login to your online banking account
- Click on the My Profile link,
- Click on the Change Profile link
- Update your email address within the email address field
- Click the Proceed button. Once you have confirmed the email address was changed correctly, click on the Submit Info button.

Advertising

We use our Site to advertise our products and services. We strive to place ads where we think they will be most relevant to our customers. We advertise on pages within our Site as well as on other unaffiliated websites. These advertisements may be presented in the form of banner ads, splash ads (ads that appear as you sign on or sign off of your online accounts), and other formats. These advertisements may include prescreened offers of credit. We may use information about your relationship with us including the types of accounts you have, the state in which you bank, or purchase activity to customize advertisements that may be of interest to you.

We also may use advertising service providers to assist us in determining which of our advertisements most likely would be of interest to you. For this purpose we use certain information and limit access and collection of information for specific purposes by these providers. Information collected by our advertising service providers through cookies and other technologies include:

- The number of people who look at each of the pages on the Site
- Search engine referrals
- Browsing patterns within the site
- Responses to advertisements and promotions on the Site and on websites where we advertise

Third Party Links

We may reference links in our content to other websites (including blogs, articles, products, services, news sites and other web sites) controlled by third parties who are not affiliated with TCBWA (Third-Party Sites). These Third-Party Sites may not follow our same privacy, security, or accessibility standards.

We are not associated with the Third-Party Sites referenced and are not responsible for, or endorse or guarantee, the content, web sites, products, services or operations of the Third-Party Sites or their affiliates. We are not responsible for how these Third-Party Sites collect information. We cannot guarantee how these Third-Party Sites use cookies, or if they place cookies on your computer that may identify you personally. We

urge you to review the privacy policies of each of the linked websites you visit before providing them with any personally identifiable information.

In addition to TCBWA's Site referencing third party links, periodically, third party websites may link back to online properties owned and operated by us, including websites, blogs, articles, products, services, news and more. We may not be associated with these third party sites linking back to our website. Furthermore, we are not responsible for and do not guarantee the content, products, services or operations of third party sites linking to us. TCBWA does not guarantee and is not responsible for the privacy or security of third party websites linking to our website, including the reliability, accuracy and completeness of the information they provide.

Social Media

TCBWA does not actively engage in social media at this time. All content you post and make available on social media platforms (including, without limitation, any personal information, pictures, or opinions) is subject to the Terms of Use and Privacy Policies of those platforms. To better understand your rights and obligations with regard to such content, please refer to them.

Notice to Persons Accessing this Site Outside the United States

If you are accessing our website from a location outside of the United States, all information you provide on our Site will be transferred out of your resident country into the United States. Do not provide information to us if you do not want your personally identifiable information to leave your country. By providing personally identifiable information to us, you are explicitly consenting to the transfer of your information to the United States and will be bound by United States law, this Statement, and our Consumer Privacy Notice, available at www.tcbwa.com.

Changes to this Notice

We may add to, delete, or change the terms of this Online Privacy Statement from time to time by posting a notice of the change (or an amended Online Privacy Statement) at this website. Your continued use of our website or any online service following notification will constitute your agreement to the revised Online Privacy Statement.

Questions

If you have any questions regarding this Online Privacy Statement, you can call us at (206) 292-3900.