

BMO Digital Privacy Policy (U.S.)

Effective Date: January 1, 2020

SUMMARY

This Digital Privacy Policy (“Policy”) applies to individuals in the United States who visit or use our websites, mobile applications, branded applications, social media sites, or pages, and any other online or mobile services available electronically in the United States, as well as any interactions you may have with our digital or online promotional campaigns (collectively, “BMO Digital Services” or the “Services”). *(Please note: This Policy replaces and supersedes BMO’s Online and Mobile Privacy Policy.)*

This Policy explains how we collect, use, share, disclose, and manage your information when you visit or use BMO Digital Services. By using BMO Digital Services, you agree to the terms contained in this Policy.

SCOPE

- This Policy applies to BMO Digital Services provided by BMO Harris Bank N.A. (the “Bank”) and its affiliates providing services in the U.S.
- Personal information of customers will be collected, used, managed and shared in accordance with the applicable entity’s Privacy Notice.

COLLECTION OF PERSONAL INFORMATION AND YOUR CONSENT

- We may collect personal information when you use BMO Digital Services, including our websites, mobile application or other electronic services. We, or third parties acting on our behalf, may also collect other data about you through your online or mobile activities that may or may not be personally identifiable.
- Data we may collect includes location information, device information, website use information, and other information.
- Each time you use our BMO Digital Services, you are indicating your acknowledgement and consent to the collection, use and disclosure of information about you collected through our BMO Digital Services as set forth in this Policy. We may revise this Policy periodically at any time. We will let you know of any changes by posting a revised Policy on our website with a new effective date. If you do not accept the terms outlined in this Policy or any revised Policy, please do not use our BMO Digital Services.

PURPOSES FOR USE AND DISCLOSURE

- We may use and disclose your personal information in accordance with applicable law, our [U.S Privacy Code](#), our [Privacy Notice](#), and other state-specific policies (if applicable) found at bmoharris.com/privacy. Such uses include providing and managing the BMO digital banking and account opening services (“BMO Digital Banking Services”).
- Personal information includes information that identifies you. It includes information you have provided to us or that was collected by us from other sources. It may include details such as your name, address, age, gender, financial records, and identification numbers, including Social Security Number.

USE OF TRACKING TOOLS

- We and our service providers may use various tracking tools, such as cookies, pixel tags and web beacons, on our websites and advertisements. We use these tools to collect and display certain information about you over time and across multiple websites or other platforms when you use BMO Digital Services.

INTEREST-BASED ADVERTISING AND “DO NOT TRACK” SIGNALS

- We and our service providers may present ads to you using information gathered about you over time across multiple websites or other platforms, including mobile applications.
- BMO does not respond to “do not track” signals. We provide links to certain third party ad programs for online behavioral advertising, where you may opt-out of having your online behavior collected for advertising purposes.

YOUR CHOICES

- We may send you promotional emails, from which you may opt-out.
- You may choose to participate in online surveys, contests, sweepstakes and other voluntary activities, where information provided will be used in accordance with this Policy and, if applicable, the sweepstakes’ official rules.

SAFEGUARDS AND THIRD PARTY LINKS

- We use security controls to protect your personal information.
- Our websites may contain links to other sites that we do not own or operate, of which we may not have any control over the data that is collected.

1. SCOPE

We are committed to respecting and protecting the privacy of our online and mobile visitors. This Policy explains what information the Bank and its affiliates providing banking and non-banking services in the U.S. (together with the Bank referred to collectively herein as “BMO,” “we” or “us”) may collect about you via BMO Digital Services and how we use and protect that information. It should be read in conjunction with the [Website Terms of Use](#).

The Bank uses and shares its customers’ personal information in accordance with the terms of its [Privacy Notice](#). In addition, each of the Bank’s affiliates providing services in the U.S. uses and shares its consumer customers’ personal information in accordance with the terms of its privacy notice, which is available on each entity’s website.

2. COLLECTION OF PERSONAL INFORMATION AND YOUR CONSENT

We may collect personal information when you use BMO Digital Banking Services, including when you apply to open an account online, log in online, use the mobile application, or schedule an appointment.

We may also collect other data about you through (i) your use of BMO Digital Banking Services, (ii) other BMO Digital Services or (iii) third parties acting on our behalf. This data may or may not be personally identifiable. Data that we may collect includes:

- **Transactional Information**, about your use of our products and services.
- **Location Information**, such as the information about your device's approximate physical location for purposes such as validating your identity, the prevention, suppression or detection of crime, and to enhance the functionality of a particular service, for example locating a nearby BMO branch. The ability to access location information is controlled by your device. Please refer to the user guide for your device regarding how to allow or block the collection of location information. If you choose not to provide location information, some services may not operate effectively.
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other similar device information in order to improve your experience, to protect against fraud and manage risk.
- **Website Use Information** such as browsing behavior on BMO websites, and links and locations you click, form data and downloads, as well as other data gathered from the use of web tools (for example, Cookies, Pixel Tags and Web Beacons) to better understand your interests and needs so that we can serve you better.
- **Other Information**, such as any feedback you may provide to us, answers to surveys and questionnaires, and use of online tools and calculators.

We do not knowingly solicit from, and the BMO Digital Services are not intended for, children under 13, and children under 13 should not provide personal information online. If a parent or guardian becomes aware that his or her child under the age of 13 has provided us with information without their consent, he or she should [contact us](#). We will delete such information from our files.

3. PURPOSES FOR THE USE AND DISCLOSURE OF PERSONAL INFORMATION

We may use and disclose your personal information that is collected through our BMO Digital Services in accordance with applicable law and the applicable consumer customer privacy notice to:

- Verify your identity and authenticate you;
- Provide and manage the online products and services you have requested;
- Protect against fraud, security threats and otherwise manage risks;
- Communicate with you regarding products and services that may be of interest;
- Evaluate and improve our websites and other electronic offerings;
- Satisfy legal or regulatory requirements or law enforcement requests; and
- As permitted by applicable law.

4. USE OF TRACKING TOOLS

We or our service providers may use various tracking tools, such as Cookies, Pixel Tags Web Beacons and device IDs, on our websites, mobile applications, and advertisements.

- **Cookies** are a string of data sent between a server and a web browser to, for example, help facilitate the use of a website and to help understand how a website is being used. Different types of cookies are used for different types of activities. Examples of cookies we may use are:

Session cookies enable the website you are visiting to keep track of your movement from page to page so you do not get asked for the same information you've already given to the site. Session cookies allow you to proceed through many pages of a site quickly and easily without having to authenticate or reprocess each new area you visit. They are not written to your hard drive so they are deleted once you log out or close your browser. These cookies do not gather personal information about you that could be used for marketing or remembering where you have been on the Internet.

Persistent cookies help websites remember your information and settings when you visit them in the future, and help us provide you with a more personalized experience when you are using our websites by analyzing which products and services you have used. When you log in to any of our online services, we associate you with a unique internal identifier. The unique identifier allows us to know who you are; however, the cookie will never contain personal information that would identify you to a third party. This unique identifier enables us to monitor your browsing habits on our websites so that we can better understand your needs and communicate with you regarding products and services that may be of interest to you. Persistent cookies are stored on your computer.

Cookies are a commonly-used technology and many web browsers default to automatically accept cookies. If you decide that you do not wish to accept cookies, refer to your browser's online help for further instruction and information on setting cookie preferences.

In addition to cookies, we may use Flash cookies (also known as "local shared objects") to improve your website experience by identifying online behaviors and customizing the ads you view to reflect your browsing experience. While Flash cookies are similar to cookies in terms of their operation, they may not be managed or deleted in the same way. They may be stored on your device using a media player or other software installed on your device. Deleting cookies from your browser does not delete Flash cookies. You may learn more about Flash cookies through the [Adobe website](#).

If you do not accept cookies or Flash cookies, you may continue to browse our websites; however, you should be aware that certain features of our websites may not function properly without cookies or Flash cookies. If you would like to use our BMO Digital Service you will be required to accept the cookies or Flash cookies to maintain session integrity and enhanced security.

- **Pixel Tags, Web Beacons** and similar technologies are tracking tools that may be used on our website that, when combined with cookies, monitor user activity. They help us capture user activity for analysis to better understand use and effectiveness of the website, enhance user experience and provide additional security controls. We do not collect any personal information through these tools.
- **BMO Digital Banking Authentication Processes** capture and store device information as well as information you provide in order to confirm your identity each time you visit our secure

websites. When you purchase a new product online, register for a secure online service or activate an existing product, the application you complete may include an online authentication process. The information that you provide in your application may be compared against the information contained in your consumer credit report to validate your identity.

5. INTEREST-BASED ADVERTISING

We or our service providers use data collected about you over time across multiple websites or other platforms to present interest-based ads to you. This data may be collected on our websites and platforms, or the websites and platforms of others. This may include information collected on apps. We and our service providers also use this data to help manage and optimize our BMO Digital Services and communications to you. Our ads may be for products or services we think are relevant based on your browsing habits or online activities. These ads may be about our products and services, or other companies' products and services.

We use certain tracking tools (as described above) to collect information about you to serve these ads. These tools track if you have clicked on a BMO ad on a website and identify your activity when you clicked on that ad using cookies and web beacons.

BMO uses third-party advertising networks to distribute our advertisements on other websites and mobile applications where we have paid to advertise. Our ads may also be served in emails. These advertisements may use tracking technologies to capture certain data, such as your IP address, usage information, or your responsiveness to our advertisements. To stop certain online advertising by BMO, please see the "Do Not Track Signals" section below.

Third parties may collect certain information on BMO websites or other sites where BMO advertises. These third parties might link your name or email address to other information they collect from certain third party websites you may visit.

6. "DO NOT TRACK" SIGNALS AND OPTING OUT OF ONLINE BEHAVIORAL ADVERTISING

There is no industry standard for how Do Not Track consumer browser settings should operate on commercial websites. As a result, BMO Harris does not respond to "do not track" signals from your browser at this time. If you block or reject cookies, not all of the tracking described here will stop. Options you select are browser and device specific.

However, BMO provides links to third party ad network self-regulatory programs for online behavioral advertising, including the [Digital Advertising Alliance \(DAA\) Self-Regulatory Program for Online Behavioral Advertising](#). The DAA's Principles are intended to provide consumers with transparency about the collection and use of data for online behavioral advertising and to promote the consumer's choice in managing its scope. BMO adheres to the DAA's Principles.

Pursuant to the DAA's Principles, BMO honors Do Not Track opt-out preferences that you make to participating third party advertising networks that we hire to perform advertising on our behalf. To limit or stop the collection of your online behavior for advertising purposes, you can visit <http://www.aboutads.info/choices/>. You can also learn more at <https://www.youradchoices.com>. You can also click on DoubleClick, http://info.evidon.com/more_info/4311?cps%5b4311%5d=1, to opt out of that ad program. These opt-outs work by placing a cookie on your browser. If you delete cookies,

use a different computer, reset or change mobile devices or change browsers, you will need to opt-out again.

Certain BMO Harris ads on third-party websites may display an “Advertising Options” Icon that you can click on to learn about your choices. This icon will only appear on certain platforms. You should always review the privacy policy on any third party site you visit. You can also help limit the amount of online and mobile advertising that you receive by opting-out of advertising from Network Advertising Initiative member companies at <https://www.networkadvertising.org/choices>.

For mobile users, you can also download the AppChoices mobile app on your supported Apple or Android mobile device and visit <http://www.aboutads.info/appchoices> for more information on how to limit advertising while using apps on your mobile device. Additionally, you may be able to limit ad tracking on apps by adjusting the settings on your mobile device.

You may still receive online advertisements from us even if you opt out in any of the ways identified above but they will not be customized based on your choices or behavior. Choices you make are browser and device specific.

7. YOUR CHOICES

Email Communications: If you prefer not to receive email communications from us, you can unsubscribe by clicking the “Unsubscribe” button provided in the promotional emails you receive from us. Please allow up to 10 business days for us to process your request. However, if you unsubscribe, we may still send you transactional emails (for example, a notice about an upcoming change affecting your account) about your accounts and services.

Voluntary Participation: From time to time, you may choose to enter your information in order to participate in online surveys, contests, sweepstakes or other activities that we sponsor. We use this information for a variety of reasons, such as measuring the performance of the website, or identifying products and services that might interest you. All information is used in accordance with the purposes outlined in this Policy and the official rules of the contest or sweepstakes, if applicable. Do not participate in these voluntary activities if you do not want your information used for these purposes.

8. SAFEGUARDS AND THIRD PARTY LINKS

We use security controls to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your personal information in our custody or control.

When you access any of our BMO Digital Banking Services, we use multiple layers of protection, such as passwords and pass keys, firewalls and encryption. We may use the services of a third party supplier to help administer our public facing websites. When we do, we initiate an extensive assessment process to ensure the third party’s standards and safeguards closely match our own.

To learn more about the Bank’s online and mobile security practices, visit our [Security Center](#). To learn more about the other Bank-affiliated entities’ security practices, visit each entity’s website.

Our websites may contain links to other sites that we do not own or operate. Also, links to our websites may be featured on third party websites on which we advertise. We provide links to third party websites

as a convenience to the user. These links are not intended as an endorsement of, or referral to, the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

CONTACT US

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please let us know by contacting us at privacy.matters@bmo.com. You can also raise questions or concerns about our privacy practices by visiting one of our branches.

