

## HTLF Privacy Policy

Effective Date: December 8, 2023

**Heartland Financial USA, Inc.** and its subsidiaries and affiliated companies (“HTLF,” “we,” “us,” or “our”) provides this Privacy Policy to describe our collection, use, and disclosure of your Personal Information, as defined below. This Privacy Policy applies to Personal Information obtained about you through our websites and online features that link to this Policy (the “Sites”) and our mobile applications (the “Apps”) (collectively, the “Platform”). If you receive banking and other financial services from us, please see our Financial Privacy Notice for information about how we collect, use and share your nonpublic personal information. If you are a California resident and would like more information about your rights under the California Consumer Privacy Act, as amended (the “CCPA”), please visit our [“California Privacy Rights Notice”](#) below.

As used in this Privacy Policy, “**Personal Information**” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a specific person. Personal Information does not include information that is publicly available, de-identified, aggregated, or pseudonymized, or otherwise exempted by law.

Unless otherwise noted, the disclosures herein cover our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.

### **Collection, Use, and Disclosure of Personal Information**

HTLF may collect, use, and disclose your Personal Information to operate our Platform and for business purposes consistent with applicable laws. Where HTLF discloses Personal Information, such as to our service providers, we do so for the same business purposes described below and where appropriate, require that recipients of Personal Information maintain appropriate systems and processes to ensure confidentiality, security, and protection of the Personal Information. The below chart describes how we may collect, use, and disclose your Personal Information, which may vary depending on the nature of your interactions with us.

<b>Types of Personal Information</b>	<b>Business Purposes for Collection, Use, or Disclosure</b>	<b>Recipients of Personal Information</b>
<p><b>Identifiers</b>, such as name, title, alias, postal address, phone number, email address, unique personal identifier, online identifier, IP address, and mobile device identifiers <i>We collect, use, and disclose <b>Personal Information Described in Cal. Civ. Code § 1798.80(e)</b>, including name, address, telephone number, and medical information.</i></p> <p>We may also collect identifiers that are considered “sensitive”</p>	<ul style="list-style-type: none"><li>• Provide and maintain our Platform, including to monitor the usage of our Sites and Apps, and our products and services;</li><li>• Facilitate, manage, personalize, and improve your experience of our Platform;</li><li>• Communicate with you, including about our products and services, updates to our terms and policies, and to obtain your feedback;</li><li>• Recognize you when you use our Platform;</li><li>• Show you relevant ads while you browse the internet or use social media;</li><li>• Auditing, research and analysis, to maintain and improve our Platform and our products and services, and for any other internal business purposes;</li></ul>	<ul style="list-style-type: none"><li>• Data analytics providers;</li><li>• Service providers, including those who help us to place relevant advertisements;</li><li>• Security providers;</li><li>• Information technology vendors;</li><li>• Professional advisors; and</li><li>• External auditors.</li></ul>

Types of Personal Information	Business Purposes for Collection, Use, or Disclosure	Recipients of Personal Information
<p>under certain laws, such as account credentials and health information. We may process your account credentials when you log in or provide your account, credit card, or debit card number with your password or other credentials. We may process your health and medical information when you choose to provide it to us in free text fields during your banking activities.</p>	<ul style="list-style-type: none"> <li>• Marketing and advertising; and</li> <li>• Detect and prevent fraud against you and/or us.</li> </ul>	
<p><b>Internet or Other Electronic Network Activity Information</b>, including browser type and language, operating system, internet or mobile network provider, website access time, duration of visit, referring website address, browsing and search history on our Platform, webpages viewed immediately before and after our Sites, information related to your interactions with our Platform, emails, online chat, and advertisements</p>	<ul style="list-style-type: none"> <li>• Provide and maintain our Platform, including to monitor the usage of our Sites and Apps, and our products and services;</li> <li>• Facilitate, manage, personalize, and improve your experience of our Platform;</li> <li>• Provide you with appropriate recommendations;</li> <li>• Show you relevant ads while you browse the internet or use social media;</li> <li>• Marketing and advertising;</li> <li>• Auditing, research and analysis, to maintain and improve our Platform and our products and services, and for any other internal business purposes; and</li> <li>• Detect and prevent fraud against you and/or us.</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers;</li> <li>• Service providers who help us to place relevant advertisements;</li> <li>• Security providers;</li> <li>• Information technology vendors;</li> <li>• Professional advisors; and</li> <li>• External auditors.</li> </ul>
<p><b>Geolocation Data</b>, including your physical location inferred from your IP address</p> <p>We may also collect identifiers that are considered “sensitive” under certain laws, such as precise geolocation. We may process your precise geolocation data when you choose to share it for the purposes of searching for bank locations/branches.</p>	<ul style="list-style-type: none"> <li>• Provide and maintain our Platform, including to monitor the usage of our Sites and Apps;</li> <li>• Facilitate, manage, personalize, and improve your experience of our Platform;</li> <li>• Auditing, research and analysis, to maintain and improve our Platform and our products and services, and for any other internal business purposes;</li> <li>• Marketing and advertising; and</li> <li>• Detect and prevent fraud against you and/or us.</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers;</li> <li>• Information technology vendors;</li> <li>• Professional advisors;</li> <li>• External auditors; and</li> <li>• Service providers.</li> </ul>
<p><b>Audio, electronic, visual, or similar information</b>, including consumer voicemails, photos, images and videos</p>	<ul style="list-style-type: none"> <li>• Provide you with customer service;</li> <li>• Facilitate, manage, personalize, and improve your experience of our Platform;</li> <li>• Detect and prevent fraud against you and/or us; and</li> <li>• Improve our products and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Information technology vendors; and</li> <li>• Service providers.</li> </ul>

Types of Personal Information	Business Purposes for Collection, Use, or Disclosure	Recipients of Personal Information
<b>Professional or employment-related information</b> , including your job title or organization name	<ul style="list-style-type: none"> <li>• Contact you regarding our commercial products and services;</li> <li>• Marketing and advertising;</li> <li>• Auditing, research and analysis, to maintain and improve the Platform and our products and services, and for any other internal business purposes; and</li> <li>• Detect and prevent fraud against you and/or us.</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers;</li> <li>• Information technology vendors;</li> <li>• Professional advisors;</li> <li>• External auditors; and</li> <li>• Service providers.</li> </ul>
<b>Additional Personal Information you may choose to provide</b> , including the contents of communications you send to us by phone, email, text, or online chat, and the names, phone numbers, and other details from your contact lists and/or address book	<ul style="list-style-type: none"> <li>• Communicate with you about our products and services, updates to our terms and policies, and to obtain your feedback;</li> <li>• Facilitate, manage, personalize, and improve your experience of our Platform;</li> <li>• Provide customer service and support;</li> <li>• Improve our Platform and our products and services;</li> <li>• Marketing and advertising; and</li> <li>• Detect and prevent fraud against you and/or us.</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers;</li> <li>• Service providers, including those who help us to place relevant advertisements;</li> <li>• Security providers;</li> <li>• Information technology vendors;</li> <li>• Professional advisors; and</li> <li>• External auditors.</li> </ul>

We may disclose each of the categories of Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the personal information was collected, including, but not limited to:

- Auditing our ads;
- Helping to ensure security and integrity of your Personal Information;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Providing advertising and marketing services, except for cross-context behavioral advertising
- Internal research for technological development; and
- Verifying the quality and/or safety of our services and devices.

In addition to the purposes for collection, use, and disclosure of Personal Information described above, we may collect, use, and disclose Personal Information: as required by law, regulation, or court order; to respond to governmental and/or law enforcement requests; to identify, contact, or bring legal action against someone who may be causing injury to or interfering with our or others’ rights or property; to support any actual or threatened claim, defense, or declaration in a case or before any jurisdictional and/or administrative authority, arbitration, or mediation panel; in connection with disciplinary

actions/investigations; or in connection with the sale, assignment, merger, reorganization, or other transfer of all or any portion of our business or assets.

### **Sources of Personal Information**

We may collect your Personal Information from the following sources:

- **Directly from you**, including when you provide us information online, through electronic forms, over the phone, or through paper documents.
- **Automatically through our Sites and Apps**, including via cookies and other tracking technologies.
- **From our service providers, vendors and suppliers, or other individuals and businesses**, such as organizations that collect information on our behalf or individuals that refer you to us.
- **From other external sources**, such as data providers.
- **From public sources of data**, such as government databases.

We may also collect publicly available information about you, including information that is lawfully made available to the general public from federal, state, or local government records.

### **App Permissions**

Depending on your device or permission settings, our Apps may collect Personal Information described above from devices you use to access the Apps. You may use your App settings to choose whether to consent to our collection of certain Personal Information. If you do not consent to certain App permissions, this may impact the functionality of the Apps and our ability to provide products, services, or features to you.

### **Retention of Your Personal Information**

We keep the categories of Personal Information described above for as long as is necessary for the purposes described in this Privacy Policy or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which it was collected;
- Your Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your Personal Information by applicable laws or regulations.

Where Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the details below.

## **Security of Your Personal Information**

We take reasonable technical, organizational and administrative measures to protect your Personal Information against unauthorized or unlawful processing and against accidental loss, destruction, or damage. However, because transmission via the Internet and online digital storage is not completely secure, we cannot guarantee the security of any information we may have collected from or about you through our Platform.

## **Children's Privacy**

The Sites are not intended for, nor targeted to, children under 16, and we do not knowingly collect any Personal Information from children under 16. If we become aware that an individual submitting information is under 16, we will delete the information in accordance with applicable law.

## **Links to Other Websites**

Our Platform may contain links to other websites or online services for your convenience and information. HTLF is not responsible or liable for the content or privacy policies of websites or services that it does not control, and the inclusion of a link to another website or online service does not imply HTLF's endorsement.

We encourage you to review the terms, policies, privacy statements, and settings of these other platforms to learn more about their data practices.

## **Cookies and Tracking Technologies**

We use cookies, web beacons (or pixel tags or clear GIFs), tracking scripts, and other types of tracking technologies (collectively "**Cookies**") on our Platform to collect and analyze information about visitors' interactions with the Platform. The Cookies we use are placed by us or by our vendors. We (and our vendors) may link the information collected by Cookies to other information collected about you.

Cookies may carry out various functions; for example, they may store information to help our Platform function properly; recognize your device when you visit our website again; and help us understand your use of our website over time. We may use cookies to:

- enhance your experience on our Platform by improving navigation speed;
- recognize your preferences, so that you do not need to enter the information each time you visit our Platform;
- customize your browsing experience on our Platform by showing you information more likely to be relevant to you;
- learn about your visit to our Platform, for example, by collecting information about which pages on our Platform you viewed or links you clicked and how you interacted with our content during your visit or over multiple visits; or
- deliver advertisements, customize advertisements, and track advertising campaign efficiency.

We may offer third party integrations on our Platform. If you choose to connect a third party account to our system, you should refer to that party's privacy policy for information on how your Personal

Information is collected, used and protected. One such integration is YouTube API Services, which may serve content and collect, store, use, process, access, and share Personal Information as described in this Privacy Policy. For more information about the YouTube API Services, please refer to the Google Privacy Policy (<http://www.google.com/policies/privacy>).

We may use Google Analytics or other providers for analytics services. We may also implement Google Analytics Advertising Features such as remarketing with analytics and interest-based ads. We may use first-party cookies or other first-party identifiers as well as third-party cookies or other third-party identifiers to, e.g., deliver advertisements, measure your interests, and/or personalize content. For more information on how Google Analytics uses data collected through our Sites, visit <http://www.google.com/policies/privacy/partners>. To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout> or download the Google Analytics Opt-Out Browser Add-On.

You may also opt out of certain tracking technologies by visiting the opt out services by the [Digital Advertising Alliance](#). You can also visit [Ad Choices](#) (US). Opting out through these services out does not mean you will no longer receive advertising from us, or when you use the internet.

Depending on your device settings, you may also opt out of certain interest-based advertising through your device's "Limit Ad Tracking" or equivalent feature. Refer to your device for more information on what this opt out affects. For instance, you can adjust or reset the advertising identifiers on your mobile device in the device settings. iOS users can visit Settings > Privacy > Advertising > Reset Advertising Identifier. Android users can visit Google settings > Ads > Reset advertising ID.

You can set your browser to refuse Cookies, but if you do so, you may not be able to access or use portions of our Sites, and certain offerings on our Sites may not function as intended or as well.

We are not responsible for opt-out processes provided by external parties.

### **Email Marketing**

We may use your Personal Information to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

We may use email marketing service providers to manage and send emails to you.

### **California Privacy Rights Notice**

The following California Privacy Notice ("**Notice**") is provided pursuant to the California Consumer Privacy Act, as amended (the "**CCPA**"), and applies to HTLF's Sites and Apps, as well as HTLF's offline collection of Personal Information. For more information on how we collect, use, and disclose your Personal Information, both online and offline subject to the CCPA, please review the "[Collection, Use, and Disclosure of Personal Information](#)" section above. For more information on how long we retain your Personal Information, please review the "[Retention of Your Personal Information](#)" section above.

#### **1. Submitting a Request Related to Your California Privacy Rights**

California residents have certain rights relating to their Personal Information as described below. Please note that when submitting a request, you may be asked to provide information to verify your identity

before action is taken. You may designate an authorized agent to make the requests below on your behalf. An authorized agent must submit proof to us that he or she has been authorized by you to act on your behalf, and you will still need to verify your identity directly with us before we can process the request.

**To submit a privacy request**, please contact us at [adoptout@htlf.com](mailto:adoptout@htlf.com) or call 877-398-0062.

## **2. Your California Privacy Rights**

**Right to Know.** You have the right to know what Personal Information we have collected about you, which includes:

1. The categories of Personal Information we have collected about you, including:
  - a. The categories of sources from which the Personal Information was collected;
  - b. Our business purposes for collecting or disclosing Personal Information;
  - c. The categories of recipients to which we disclose Personal Information;
  - d. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information;
2. The specific pieces of Personal Information we have collected about you.

**Right to Delete Your Personal Information.** You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

**Right to Correct Inaccurate Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

**Right to Opt Out of Sales and Sharing of Personal Information.** We do not sell your Personal Information or share your Personal Information for cross-context behavioral advertising.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

**Rights Related to Automated Decision-Making.** We do not use automated decision-making to evaluate personal aspects relating to you.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** If you choose to exercise any of the privacy rights described above, we will not discriminate against you.

## **3. Third-Party Marketing**

We do not share Personal Information as defined by California Civil Code § 1798.83 (“Shine the Light” law) with third parties for their own direct marketing purposes. Californians may request information about our compliance with this law by emailing us at [adoptout@htlf.com](mailto:adoptout@htlf.com) or by sending a letter to us at HTLF Compliance/Data Privacy Department, 700 Locust Street, Dubuque, IA 52001

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

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, you can contact us here:

HTLF Compliance/Data Privacy Department,  
700 Locust Street  
Dubuque, IA 52001