At TCF and its banking and non-banking affiliates and subsidiaries ("we," “us,” “our,” and “TCF”), we know that your financial information is important to you. We remain committed to protecting the privacy of that information. This Online Privacy and Security Policy describes how TCF treats information that you provide or that we collect through (a) our website(s) and TCF-branded social media sites or pages ("Site"), or (b) any of our online or mobile banking services and applications ("Services"). By using the Site or the Services, you agree to all the terms of this Policy.

Respecting Your Privacy

Types of Information We Collect
When you visit and browse the Site or use the Services, we are able to collect information that could be reasonably used to indirectly identify you individually, such as your physical location, the device you are using and the Internet Service Provider (ISP) you are using. We can also record the date, time, and pages visited while you are at our site and the type of web browser and operating system you use. We do this to determine how individuals use our Site and Services so that we can enhance the individual user’s experience and make the Site and Services more useful for our customers and potential customers.

When you request information or make an application for, or use, the Services, we collect personally identifiable information that you provide to us directly, such as by completing an online form, application, field, or survey. "Personally identifiable information" or "PII" means information that directly identifies you, or can be used to directly identify you, individually. Examples of PII may include your name, physical address, email address, telephone number, social security number, date of birth, or account information. If you are enrolled for the Services, you can review and make changes to your online account preferences, personal preferences, or email address by signing in to TCF Online Banking and clicking on “Preferences.”

We may also collect information to help us understand your financial needs so that we can offer you products and services. For example, if we know that you own a home, we may offer you a home equity loan. We do this by collecting identifying information (such as your name and address), information from your application (such as your assets), transaction information (such as your loan repayment history) and information to comply with applicable laws and regulations. We may also collect information to design new products or services, or modify existing products or services, in order to meet the needs of our customers.

When you use the Services, you also may be required to enter information we believe is necessary to safely process your transactions, such as your digital banking Login ID and password.

How We Use Your Information
We may use your personally identifiable information to, among other things:

• Open an account for you, enroll you for Services, or complete your transactions;
• Respond to your requests for information and otherwise communicate with you;
• Provide you with information about products and services that we, or third parties with whom we do business, offer or make available;
• Send you notices or alerts concerning your account or account transactions;
• Detect and prevent activities that may violate our policies or be illegal; and
• Comply with our legal and regulatory obligations.

We may also use aggregate personally identifiable information from you and other users of the Site and Services to develop and implement marketing strategies, improve our current products and services and develop new ones, and enhance the Site and Services.

We may share your personally identifiable information as described in the TCF Privacy Policy, which you can access at tcfbank.com by clicking on the Customer Service tab and clicking the link under the Disclosures and Agreements heading. The TCF Privacy Policy applies to online and offline information we collect only for accounts intended to be used primarily for personal, family or household purposes. The TCF Privacy Policy also describes how you can prevent TCF from sharing certain personally identifiable information, or "opt-out."

We may also use information that we collect through the Site and Services to optimize and improve user experiences when using the services, as further described below under "Online Tracking" and "Advertising."

Online Tracking
We and our service providers may collect information about your usage of the Site or Services and other Internet activities using tracking technologies, including but not limited to:

• Browser Cookies – HTML, or “browser” cookies are small text files stored directly on your device. They allow us to recognize your device and store user preferences for when you return to our website. Cookies may be temporary, called “session cookies.” Session cookies expire at the end of your browsing session or within 24 hours. Or they may stay on your device for longer periods until their expiration date, called “persistent cookies.” Cookies may be used to collect information about your Internet service provider, Internet protocol (IP) address, Internet browser and operating system, the time spent using the Services, the Site or applications you visit, account preferences, and other non-
personally identifiable information. The Services do not use cookies to capture your unencrypted Personally Identifiable Information.

- **Flash Cookies** – Similar to browser cookies, local shared objects, or “flash cookies,” are also used to recognize your device and store user preferences for when you return to our website. Flash cookies can be shared across browsers on the same device.

- **Pixel Tags** – Pixel tags, also called web Beacons or clear Graphics Interchange Formats (GIFs), and similar technologies are typically small blocks of code embedded in images shown in the Site, the Services, or certain e-mails we send you. They may involve the transmission of information directly to us or to third parties on our behalf. We may use these technologies to bring together information we collect about you.

- **IP Address** - Your IP address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many websites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, to personalize/tailor your experience while engaging with us online and offline, for compliance and security purposes, for advertising and administering the Site. Please see the Advertising section below for more information.

- **Location Tracking** – Certain applications may transmit information to us about your location when you request information from them. We may use cookies and other tracking technology to:

  - Determine whether you might be interested in new products or services.
  - Analyze the effectiveness of our ads; and
  - Collect and compile aggregated information for statistical and evaluation purposes to help us understand how the Site or Services are used. This helps us enhance the Site or Services, enhance other products and services and develop new ones, and develop marketing and promotion strategies.

You have the ability to disable browser cookies, generally by changing your Internet software browsing settings. It may also be possible to configure your browser to accept specific browser cookies or to notify you each time a new cookie is about to be stored on your device, thereby enabling you to decide whether to accept or reject the cookie. Changing your browser settings does not disable flash cookies. However, you can disable or delete the data stored by flash cookies or similar technologies by managing your browser’s “add-on settings” or visiting the manufacturer’s website. If you refuse cookies, you will not have access to many features that make your user experience more efficient and some of the Site or Services will not function properly.

**Advertising**

TCF advertises online (e.g., pages within our Site and mobile apps, through TCF-managed social media presences and on other sites and mobile apps not affiliated with TCF) and offline (e.g., branches, ATMs, through call centers and direct marketing). In order to understand how advertising performs, we may collect certain information on our Site and other sites and mobile apps through our advertising services providers using cookies, IP addresses, and other technologies. The collected information may include the number of page visits, pages viewed on our Site, search engine referrals, browsing activities over time and across other sites following your visit to our Site or apps, and responses to advertisements and promotions to the Site and on sites and apps where we advertise.

We use such information to present tailored ads to you including:

- Banner ads that appear as you sign on or off of your online accounts with us or within mobile banking;
- Email, postal mail, telemarketing;
- On other sites and mobile apps not affiliated with TCF;
- Analyze the effectiveness of our ads; and
- Determine whether you might be interested in new products or services.

**Relationship based advertising** - In order to make our advertising informative and useful, we may use information about your relationship with us (such as types of accounts, transactional information or the state in which you bank) to help determine which advertisements or offers to present to you.

**Online behavioral advertising** - We or our advertising service providers may use certain information about your activities on our Site, such as pages visited and search key words entered to help determine which of our advertisements or offers may be of interest to you. We limit access and collection information for specific purposes by advertising service providers. We may use this online information for online and offline advertising.

**Advertising on third party sites and mobile apps** - TCF contracts with advertising companies to advertise our products and services on sites
and mobile apps not affiliated with us. We may use aggregated and de-identified data and information provided by you to these third party sites and mobile apps to select which of our advertisements or offers may appeal to you, display them to you and monitor your responses. Third Party sites and mobile apps are not subject to TCF Privacy Policies. Please visit the individual sites and mobile apps for additional information on their data and privacy practices and opt-out policies.

**Online behavioral advertising on third party sites and mobile apps** - Some of our tailored ads are online behavioral advertising and may be served using data collected from third party providers. Advertising served on our behalf by these companies do not contain unencrypted personal information and we limit the use of information by such companies that serve our ads.

**Opt-Out Options**

If you prefer we not use information based on Site behavior to provide online and offline tailored content and advertising, you may opt-out at anytime by visiting Google’s Ads Settings (http://www.google.com/settings/ads), DoubleClick opt-out page (https://www.google.com/settings/ads/onweb#display_optout) or the Network Initiative opt-out page (http://www.networkadvertising.org/managing/opt_out.asp).

**E-mail**

If you provide your e-mail address to us, or if we obtain it from another source, we may use it to respond to or update you on your inquiries, to contact you about your accounts or to let you know about products and services that may be available to you. If we send you an e-mail, the primary purpose of which is for advertisement or promotional purposes, it will include instructions on how to opt-out of receiving such e-mails in the future. If you elect to opt-out of receiving e-mail advertisements and promotions, we may still send you e-mails about your account relationships with us.

**Linked Websites**

The Site and Services may contain links to third-party websites owned or controlled by third parties not affiliated with TCF. Some of these sites may share a similar "look and feel" to TCF’s website. The privacy policies applicable to your use of those websites are determined by the third party, and not TCF. TCF is not responsible for the privacy or security of those websites. We encourage you to read the privacy policies provided by other websites before you provide personal information to them.

**Children’s Privacy**

We do not use the Site or Services to knowingly solicit data from or market to children under the age of thirteen without parental consent. Parents or guardians who become aware that their child has provided us with information without their consent should promptly contact us and we will delete the information from our files. For additional information regarding the Children’s Online Privacy Protection Act (“COPPA”), please visit the Federal Trade Commission’s website at https://www.ftc.gov/tips-advice/business-center/guidance/childrens-online-privacy-protection-rule-not-just-kids-sites.

**Access to Customer Information**

TCF has policies and procedures intended to reasonably protect your customer information from illegal access or use. TCF emphasizes to employees the importance of maintaining the confidentiality of customer information. We do so through staff training, day-to-day management and enforcement of TCF’s Code of Ethics. Employees are expected to follow our confidentiality standards. Disciplinary measures are taken when appropriate to enforce these standards.

We review these policies and procedures on an ongoing basis and work to update them as needed to accommodate changing business environments and new products and services.

**Protection Against Inappropriate Use Of Customer Information**

To help protect you, TCF may gather and ask for certain information, so that we can identify you as a legitimate account holder when transacting business. We may request identifying information, such as a social security number, account number, or ask you for identification, such as your driver’s license to help guard against unauthorized use of your account.

**System Security to Protect Customer Privacy**

TCF maintains system security to help protect against any unauthorized access to customer information. These systems are intended to reasonably guard against unauthorized access and use of customer information by unauthorized individuals. TCF works to upgrade these practices and procedures on an ongoing basis.

**Sharing of Information Within TCF**

We share information with other TCF companies. In doing so, we follow all TCF security standards and policies, as well as any applicable laws or regulations regarding the sharing of such information.

**Sharing of Information With Third Parties**

TCF may share some information about our customers with other unaffiliated companies. We also share information when necessary to protect against fraud or other financial abuse, or in connection with credit reporting. TCF may also release information about you or your account, or transactions involving your account, to third parties if it is necessary to complete a transaction, or to verify the existence of the account or
availability of funds for a third party. We may also provide information to law enforcement or other government agencies or to another third party when legally required to do so (for example, in response to a subpoena). We also sometimes contract with outside agents or service providers to print checks, provide audit services, enter or calculate transactions and balances, or provide other materials or services on our behalf. We will seek to make sure that these agents, service providers, and third-party product providers agree to safeguard our information about you, your products and services with us, and to abide by applicable law.

We also occasionally decide to sell business assets or a business line, such as mortgage servicing rights. In these cases, we may transfer to the purchaser the related customer information. There may be other circumstances where it becomes necessary to disclose information in order to conduct our business.

To assist in offering you new products and services of interest you, TCF sometimes provides customer information to parties outside TCF. Of course, you may accept or decline any of these product offerings, with no impact to your relationship with TCF.

**Maintaining Accurate Customer Information**

Maintaining accurate customer information is as important to us as it is to you. TCF has policies and procedures in place to help us collect and maintain accurate information. If customers inform us that they believe some of our information is inaccurate, we will investigate and take steps to correct the information where necessary. Of course, customers should notify TCF as quickly as possible of any information maintained or reported by TCF that they think is incorrect.

At TCF we value our relationship with you, our customer. We use your customer information only in connection with business purposes that we believe are appropriate and to develop better products and services to meet your financial needs.

**Internet Security**

The security of your digital banking transactions depend upon a partnership between you and TCF.

While we have numerous security measures intended to reasonably protect the confidentiality of your digital banking transactions, you are also responsible for maintaining security.

**Your Responsibility**

You are responsible for keeping your banking information confidential. This means you should not share your password, account numbers, personal identification information, or other account data with anyone, including any other companies or services providers. You should also safeguard this information so unauthorized persons cannot find it.

You are also responsible for inputting or entering correct information and for notifying us about lost or stolen information or suspected fraudulent activity. Entering incorrect information into an digital banking website can expose your information to unauthorized access and cause errors in processing your transactions.

You are also responsible for logging out when your digital banking session is complete, to prevent unauthorized persons from using the Services.

Except as otherwise provided by law, we are not responsible for your errors or negligent use of the Site and/or Services and will not be responsible for or cover losses due to:

- Misuse of any services;
- Input errors;
- Unauthorized access to your account(s) resulting from your negligence, such as sharing your password, writing down your password, entering your password when others may see you;
- Leaving your computer or device unattended while accessing the Site or Services;
- Failure to report unauthorized account access within two business days from the date it became known to you; and
- Viruses.

Viruses cannot get into your computer unless you let them by downloading programs, opening emails or attachments, or sharing thumb drives. There are numerous virus-protection programs available commercially to help you reduce, but not eliminate, this risk.

**Your Browser**

In order to use the Site or Services, your browser must support the Secure Sockets Layer (SSL) protocol. SSL helps provide a secure channel to send and receive data over the Internet. Our digital banking site is viewed best with Microsoft Internet Explorer version 10 and above, or current versions of Chrome, Firefox or Safari. Other browsers may work but the display and printing of pages may not be ideal and certain functionality may not be available.

**Trusted Operating System**

TCF uses a trusted operating system, which helps protect customer information by containing privilege and authorization codes to control access. The system also contains audit controls to track requests and navigation in order to identify suspicious activities.

**Surveillance**

We constantly monitor attempts to break into our security systems. This helps us to identify possible system vulnerabilities.
Individual User Name and Password
You authorize and authenticate your digital banking transactions by entering your login ID and password, which are encrypted when they are transmitted to us. You should safeguard your login ID and password and keep them a secret.

Timed Log-Off
TCF’s digital banking system will automatically log you off after 20 minutes of inactivity. This reduces the risk of others accessing your information from your computer while it is unattended.

Encryption
“Encryption” means we will scramble the data. We encrypt your personal data, including your password, when it is in transit. We do this to help prevent third parties from accessing your information.

You can generally determine if encryption is being used if the padlock icon on your browser is locked. If the padlock icon is unlocked, encryption is not being used. Any web address beginning with “https://...” indicates the page you are viewing uses encryption.

Routers and Firewalls
We use a series of routers and firewalls to help prevent unauthorized persons from obtaining your account information. The first component is a router, which determines who has access to designated Internet banking components by verifying the source and destination of each transmission, and determines whether or not to let the transmission pass.

A firewall tracks each request, the source of the request, when the request was made and the destination of each request. The firewall changes the “address” of the request to deliver it to the appropriate site. These precautions are used to determine whether the request is granted and helps protect our internal networks from unauthorized access.

You authorize and authenticate your digital banking transactions by entering your password, which is encrypted when it is transmitted to us. Please safeguard your password and keep it confidential at all times.

Additional Security Measures
TCF employs a layered approach to digital banking security that goes beyond trusted operating system controls, surveillance, unique user names and passwords, timed log-offs, encryption, and routers and firewalls. Certain information security-related events may trigger additional security warnings or measures that we will act upon as appropriate to safeguard the systems and customer data where possible and within our scope. For example, if we are suspicious of any online activities, we may restrict online access to accounts or prevent certain kinds of transactions. Further proof of identity may be required before we restore online access.

Alternative Risk Control Mechanisms
If you are a business customer, TCF recommends that you periodically perform a risk assessment and evaluate your controls as they relate to your digital banking activities. You should also consider the following alternative risk control mechanisms to mitigation your own risk. For instance, consider assigning separate user identification names or numbers to each of your employees having access to your online accounts, rather than letting several employees share a single name or number. Each employee should have his or her own password, and these should change every 30 days.

How To Protect Yourself
TCF will never ask you to provide your digital banking login ID, password, or PIN by email, phone or pop-up message. Use the following tips for preventing email fraud and identity theft.

General Fraud Prevention Tips
• Never provide personal information in response to an unsolicited request (including from someone claiming to be from TCF), whether it is in an email or over the phone or on the Internet. Emails and Internet pages created by phishers may look exactly like the real thing. They may even have a fake padlock icon that ordinarily is used to denote a secure site. If you do not initiate the communication, do not provide any information.
• If you are unsure whether a contact is legitimate, contact us. You can find phone numbers and websites on the monthly statements you receive from TCF. The key is that you should be the one to initiate the contact, using information that you have verified yourself.
• Never provide your account information, online banking password over the phone or in response to an unsolicited Internet request. TCF would never ask you to verify your account information or confirm a password online. Thieves armed with this information and your account number can help themselves to your money.
• Review account statements regularly to ensure all charges are correct. If your account statement is late in arriving or does not arrive, phone TCF to find out why. Check your account activity online regularly to catch suspicious activity.

Digital Banking Safety
• Do not leave your computer or device unattended after you have logged in to digital banking at TCF.
• Always exit your online banking session when you have completed your transactions.
• Safeguard your online banking password and keep it private. Never give your online banking password to others or allow others to access your online banking records.
• If you access your account information from any computer or device other than your own (such as your computer at work) be sure the system is private (not shared).
• Avoid accessing your account from Internet cafes, airports or other public Internet locations where the security of a wireless network is unknown.
• If you use convenience features in mobile banking such as log in using fingerprint technology or quick glance, do not share your device.

Telephone Banking Safety
• TCF employees will never ask you to tell them your online banking password over the telephone. If someone calls you claiming to be a TCF representative and asks for your password, do not give it out. Ask them for identification and call TCF immediately to report the incident.

TCF Debit Card Safety
• As soon as you receive a new card, call TCF to activate it, and sign the back of the card.
• Review your monthly statement or your account activity online to confirm you recognize all the transactions. Report any errors or unknown charges immediately.
• If you have to give your card to another person to complete a purchase, make sure that the card returned to you is actually yours (and not the card of someone else). Keep your transaction receipt so you have a record of your purchases.
• If you lose your card, report it to TCF immediately.

ATM Safety
We want your experience at TCF ATMs to be convenient and safe. To ensure your safety when using any ATM, follow these important tips:
• Look around and observe your surroundings – if the ATM is poorly lit or is in a hidden area, use another location.
• Have your card ready. Don’t go through your wallet or purse to find your card while stopped at the ATM.
• Don’t leave your keys or valuables in your car when using an ATM, and don’t leave your car engine running.
• Make sure people waiting behind you to use the ATM can’t see you entering your PIN or transaction amount.
• If you are using an indoor ATM that requires your card to open the door, look inside before entering. Don’t let anyone come in with you who you do not know.
• Lock the car doors and roll up the other windows when you use a drive-through ATM.
• Cancel your transaction and leave immediately if you see anything suspicious. Verify as soon as possible with TCF that the transaction was canceled.
• Don’t count your cash while standing at the ATM. Put your cash, card, and receipt away immediately.
• Never leave your receipt behind. Always take it with you. Compare your ATM receipts to your monthly statement. It is the best way to guard against fraud and it makes record keeping easier for you.
• If you lose your TCF debit card or your ATM card, [contact us](#) immediately.

Your Card and PIN
• Protect your ATM card from damage by keeping it in a safe place -- don’t allow it to bend or be scratched.
• Memorize your PIN. If you must write down your PIN, don’t keep it in your wallet, purse, or on the card itself.
• When selecting a PIN, avoid numbers and letters that can be easily identified or associated with you. Don’t use your initials, birth date, telephone number, or home address.

Identity Theft
Identity theft means a fraud was committed or attempted using identifying information of another person without authority. Thieves steal your name, date of birth, account numbers, passwords, Social Security Number, or other confidential information to use your financial accounts or run up bills on your credit cards. They can take out loans, obtain credit cards and even get a driver’s license in your name. They can do damage to your financial history and personal reputation that can take years to unravel.

How to Fight Identity Theft
• Never provide personal financial information, including your Social Security number, account numbers or passwords over the phone or the Internet, if you did not initiate the contact. Choose an online banking password that others cannot guess.
• Never click on the link provided in an e-mail you think is fraudulent. In addition to stealing your personal information, the link may contain a virus that can contaminate your computer.
• Do not be intimidated by an email or caller who suggests dire consequences if you do not immediately provide or verify financial information.
• If you are unsure whether a contact is legitimate, go to the company’s website by typing in the site address or using a page you have previously book marked, instead of using a link provided by the email.
• If you fall victim to identity theft, act immediately to protect yourself. Alert your financial institution. Place fraud alerts on your credit files.
Monitor your credit files and account statements closely.

- Learn more about how to keep your banking activity safe.

**What to Do If You Are a Victim**

- **Contact us** immediately to alert us of the situation.
- Close accounts you think have been tampered with or opened fraudulently. Phone the security or fraud department of each associated company or financial institution. Follow-up in writing and supply copies of supporting documents.
- Notify credit card companies and financial institutions in writing. Send your letters by certified mail, return receipt requested, so you can document when and what the company received. Keep copies of your correspondence or enclosures.
- Report all suspicious contacts to the Federal Trade Commission through the Internet [here](#) or by phoning 1-877-IDTHEFT (1-877-438-4338).
- Check with your state Attorney General’s office to find out if state law requires the police to take reports for identity theft. Check the Blue Pages of your telephone directory for the phone number, or check [www.naag.org](http://www.naag.org) for a list of state Attorneys General.
- File a report with local police or police in the community where the identity theft took place. Get a copy of the police report or the report number. It can help you deal with creditors who need proof of the crime. If the police are reluctant to take your report, ask to file a “Miscellaneous Incidents” report.
- Contact one of the major credit bureaus listed below to place a fraud alert on your file. A fraud alert will help prevent thieves from opening a new account in your name.

  **Equifax**
  P.O. Box 740250
  Atlanta, GA 30374
  (800) 525-6285
  [www.equifax.com](http://www.equifax.com)

  **Experian**
  P.O. Box 1017
  Allen, TX 75013
  (888) 397-3742
  [www.experian.com](http://www.experian.com)

  **TransUnion**
  P.O. Box 6790
  Fullerton, CA 92634
  (800) 680-7289
  [www.transunion.com](http://www.transunion.com)

- To learn more about keeping your money safe, visit [MyMoney.gov](http://www.mymoney.gov)

**Digital Banking & Email Fraud**

TCF will never ask you to provide your digital banking login, password or PIN by email, phone, or pop-up message. Learn about digital banking and email fraud below.

It is very important that you keep your PIN and password secure to prevent unauthorized use of your account. If you feel that your PIN or password is no longer secure, **contact us** immediately.

**FDIC Fraudulent Correspondence Alert**

Fraudulent TCF look-alike emails asking for personal and confidential information have been sent to some TCF customers. These emails are not from TCF. Do not respond to these emails or click on any links or attachments contained within them. TCF will never ask you to provide your digital banking login ID or password by email.

Access the downloads below to see examples of fraudulent emails sent to TCF customers.

**How to Report Email Fraud**

If you believe you have received a fraudulent email, please forward the email immediately to [emailfraud@tcfbank.com](mailto:emailfraud@tcfbank.com) and then delete the email.

If you have already responded to an email you believe is fraudulent, please **contact** a TCF representative immediately to report your card as stolen.

If you call after business hours, please follow the voice prompts for reporting your card as stolen. Your call will be answered by a Visa® automated processing system.

**Email Fraud Examples**

- Subject: Online Banking Update Notice
- Subject: Online Banking Alert, Reconfirm your Billing Information
Tips to keep your PIN and password secure:

- Choose a PIN and password that others cannot guess
- Do not tell anyone else your PIN or password
- Never send a PIN or password by email
- Consider changing your PIN and password regularly
- Do not leave your PIN or password where someone else can find it. Keep it safe.

FDIC Fraudulent Alerts

- New – FDIC Fraudulent Email Special Alert
- FDIC Fraudulent Correspondence Alert

To display downloaded PDFs, you will need Adobe Reader. Get it now for free.

Changes to the Online Privacy and Security Policy

TCF may make changes to this Policy from time to time by posting the changes on this website. Users are encouraged to review the Policy periodically. If we make changes to the Policy, we will update the “Effective Date” posted at the top of the Policy to reflect the effective date of the change. Any such changes will become effective when posted on this website. By continuing to use the Site or Services following such changes, you are agreeing to accept the terms of the revised Policy.