

This virtual card account servicing platform (the “platform”) is provided by WEX Inc. through your contractual relationship(s) with FNBO. WEX Inc. operates the platform in accordance with its agreement with FNBO. The information you provide in connection with your use of the platform will be governed by FNBO’s agreement with WEX Inc. and FNBO’s Privacy Notice. For the avoidance of doubt, the WEX Inc. Privacy Policy does not supersede the agreement between WEX Inc. and FNBO or your rights and obligations under the FNBO Privacy Notice or any other contractual arrangements between you and FNBO nor does it grant to WEX Inc. any rights with respect to your data.

### **First National Bank of Omaha Enterprise Privacy Notice**

Effective Date: January 1, 2022

The privacy and security of your information is very important to First National Bank of Omaha (“FNBO”, “we”, “us”, “our”). We are deeply committed to maintaining industry standard levels of security that comply with applicable federal and state laws to help protect the personal information that we collect. Additional information on our security practices may be found at the “Security Center” link at the bottom of this page. For purposes of this Enterprise Privacy Notice, the terms “FNBO”, “we”, “us” and “our” include First National Advisers, LLC and FNN Trust Company, LLC.

This Enterprise Privacy Notice applies to your interaction and communication with FNBO, including, without limitation, in person, by phone, through mail or email or through any online or mobile site, application or social media account that FNBO owns and controls (collectively, “Sites”), unless a separate privacy notice is posted or made available to you and supplements this Enterprise Privacy Notice.

This Enterprise Privacy Notice applies only to the Sites and does not extend to other websites, including websites owned and controlled by our partners or third-party websites for which we have provided links, or to any social media platforms, which are governed by their own terms of use and privacy policies.

By accessing or using our Sites or otherwise disclosing information to us, you consent to our collection, use, and sharing of your information in accordance with this Enterprise Privacy Notice.

### **Information we collect:**

We collect the below categories of information directly and indirectly from individuals and the parties with which we do business in a variety of ways, including in person, by phone, through mail or email and through our Sites. These may include parties that interact with us directly (our customers or individuals that apply for our products, respond to our surveys, request information about our products or services or otherwise voluntarily provide us with their information), parties to which we provide goods or services, parties that provide goods or services to us and other parties with whom we offer or provide products and services.

We may continue to collect and store the following types of information:

- Identifiers, such as, name, address, email address, phone number, date of birth, social security number, tax payer ID, driver’s license number, passport number, government ID or IP address.
- Protected classification characteristics, such as, race, color, national origin, marital status, sex, veteran or military status.
- Geolocation data, such as, physical location or movements.

- Biometric information, such as, face prints, voice recordings, fingerprints or keystroke patterns or rhythms.
- Commercial information, such as, organizational information, records of personal property or purchasing history.
- Internet or other similar network activity, such as, browser information, search history, device type or service provider information.
- Professional or employment related information, such as, income or current or past job history.
- Educational information, such as, transcript, student records, grades and performance, activities, school name or school ID.
- Health information, such as, medical history, insurance information, benefit plan information, claims history or payment history.
- Inferences drawn from other information, such as, person's preferences, trends or behaviors.
- Personal records, such as, family history or power of attorney.
- Information that you provide by filling in forms or providing other contributions on our Sites.
- Information received from a government entity or other third party.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Responses to surveys.
- Details of transactions you carry out through our Sites, such as, financial information, account information, credit information or transactional information.

Certain information set forth above may be categorized as "personal information" to the extent it identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. Such personal information may receive additional protections under applicable state or federal law (see below). Personal information specifically does not include information that is publicly available information from government records, or information that is deidentified or aggregated information.

#### **How we use information we collect:**

We may use information:

- To detect, investigate or prevent activity that may be illegal, violate our policies, cause harm to our operations or compromise our security.
- To optimize, improve or enhance our products, services and operations.
- To respond to your inquiries or fulfill your requests, including to provide individuals with, or evaluate their eligibility for, products and services that they have requested from us.
- To communicate with individuals about their accounts or transactions that they have made with us.
- To provide important information regarding our products or services, including changes to our policies or other terms, conditions or agreements and our Sites.
- To allow participation in surveys, sweepstakes, contests and other promotions.
- To comply with legal and regulatory requirements, required disclosures and choices or controls that may be available.
- To send offers and promotions for our products and services or for other products and services that may be of interest.
- To personalize online or mobile content and user experiences.
- To verify the identity or location of an individual for security, fraud prevention and other risk control purposes.
- To provide advertising based on activity on our Sites.

- To perform operational functions in connection with our business, including data analysis, audits, developing and improving products and services, enhancing the Sites, identifying usage trends and determining the effectiveness of promotional campaigns.
- In connection with your employment (to the extent applicable to you).
- For any other purpose disclosed by us to you at the time you provide us information.

We may disclose each of the categories of information we collect for any of the business purposes set forth above.

To the extent you have obtained a financial product or service from FNBO that is used primarily for personal, family or household purposes, please refer to the supplemental privacy statement found [here](#) with respect to how FNBO will use and share your personal information collected in connection with such financial product or service.

If you are a California resident, you may have additional rights with respect to your personal information. Please refer to the Section below entitled “California resident privacy rights”.

**How we share information we collect:**

Generally, our sharing of information is subject to additional rights available under applicable federal or state law.

We may disclose information that we collect:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of any or all of FNBO's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which information held by FNBO about our Site users is among the assets transferred.
- To third parties to market their products or services to you.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law or legal process, such as, responding to any government or regulatory request.
- To enforce or apply our terms of use with respect to our Site and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property or safety of FNBO, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may disclose aggregated information about you, and information that does not identify any individual, without restriction. We may disclose each of the categories of information we collect for any of the business purposes set forth above.

To the extent you have obtained a financial product or service from FNBO that is used primarily for personal, family or household purposes, please refer to the supplemental privacy statement found [here](#) with respect to how FNBO will use and share your personal information collected in connection with such financial product or service.

If you are a California resident, you may have additional rights with respect to your personal information. Please refer to the Section below entitled “California resident privacy rights”.

### **Cookies and similar technologies:**

We or our service providers may automatically collect information about you or visitors to our Sites using cookies. A cookie is a small file placed on a computer or mobile device by a webpage server that allows the webpage server to determine things like how much time each visit by the computer or device lasts and what the computer or device is viewing and clicking on during each visit. This information may be used for security purposes, to help in navigation, to display content more effectively, to improve experiences, optimize our sites and better serve you with appropriate and relevant marketing offers. The cookies that we use do not track activities that occur on websites other than our own.

Cookies that are used as part of our Sites may include cookies of a third party website that are being cobrowsed, for example, to deliver the Sites as intended by the third party website operator. Our Sites may also use tracking pixels or other similar technologies embedded in online advertising, often distributed to third party websites using ad exchanges that allow the gathering of data about viewers of their online advertising.

In addition, we may contract with third party advertising networks that collect IP addresses and other information from our Sites, from emails and on third-party websites. Ad networks follow your online activities over time by collecting information through automated means, including through the use of cookies and use this information to provide advertisements about products and services tailored to your interests. We may also partner with third parties to provide certain features on our Sites or to display advertising based upon your web browsing activity.

In addition, we use advertising service providers to place advertisements for our accounts and services on websites not affiliated with us, and to help us determine which of our advertisements are most likely to be of interest to you using nonPersonal Information. Advertisements placed by these service providers may use tracking technologies that allow monitoring of your responsiveness to such advertisements. We restrict access and collection of information by advertising service providers for purposes other than assisting us with our advertising efforts.

While most web browsers are automatically set to accept cookies, web browser preferences can be modified to disable cookies. Disabling or declining cookies, however, will likely impact or disable some of our Sites’ functionality and/or your user experience. While cookies are not required to browse our Site, they may be required for access to accounts. You may opt-out of certain advertising and web analytic cookies by visiting the “Modify Privacy Options” link at the bottom of this page.

### **Children’s Online Privacy Protection Act:**

We recognize that protecting children's identities and privacy is important. We do not knowingly market to or solicit information from children under thirteen (13) without the affirmative consent required under applicable law.

### **USA PATRIOT Act:**

To help the government fight the funding of terrorism and money laundering activities, the USA PATRIOT Act requires all financial institutions to obtain, verify and record information that identifies each person (including business entities) who opens an account.

What this means to you: When you open an account, we will ask for your name, physical address, date of birth, tax payer identification number and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents. We will let you know if additional information is required.

**Notice to International Users:**

The Sites and bank products and services are offered and hosted in the United States and subject to U.S. law, and are intended for users located only in the U.S. If you are accessing the Sites or bank products and services from outside the United States, please be advised that U.S. law may not offer the same privacy protections as the laws of your jurisdiction. By accessing and using the Sites or bank products and services, you consent to the transfer to and processing of your personal information in the U.S.

**California resident privacy rights:**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information; subject to exclusions from the rights granted under California law with respect to certain information governed by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or the California Financial Information Privacy Act (FIPA).

Subject to certain exceptions, California residents have the following rights regarding their personal information:

- **Access to Personal Information and Data Portability Rights.** The right to request that we disclose certain personal information to you about our collection, use, disclosure and sale of your personal information over the prior twelve (12) month period. Once we receive and confirm your verifiable request, we will disclose to you: the categories of personal information collected, the sources collected from, the purpose for collection, the categories of third parties shared with, and the specific pieces of personal information collected about you.
- **Deletion Request Rights.** The right to request we delete any of your personal information we've collected from you and retained (subject to exceptions granted under law). Once we receive and confirm your verifiable request, we will delete your personal information records, unless an exception applies.

To exercise a request described above, a California resident may [click here to submit a verifiable consumer request](#) or call our toll-free number: 855-578-8488.

Only a California resident, or someone legally authorized to act on such California resident's behalf, may make a verifiable consumer request related to his or her personal information. In connection with submitting a request, we may require you to provide certain of the Identifiers noted above and your relationship status. In general, we have the right to require you to provide written permission granting authority to your representative and for your agent to verify its identity directly with us, and we may deny a request from your representative who does not submit proof of authorization as we request.

A California resident may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify the requestor is the person about whom we collected personal information or an authorized representative and describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to a request or provide personal information if we cannot verify the identity or authority to make the request.

We will endeavor to confirm receipt of a request within ten (10) days following submission and provide information about how we will process the request. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional forty-five (45) days), we will provide notice in writing explaining the reason for the extended time period.

Making a verifiable consumer request does not require a California resident to create an account with us. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding the request receipt date. If we deny a request, we will provide a response explaining the reasons we cannot comply with a request, if applicable.

In the preceding twelve (12) months, we have not sold and will not sell California resident personal information. The foregoing statement is subject to certain exclusions governed by sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or the California Financial Information Privacy Act (FIPA).

A California resident has the right to not receive discriminatory treatment by FNBO for the exercise of the privacy rights conferred under California law. We will not discriminate against a California resident for exercising any of his or her rights.

Do-Not-Track signals are certain consumer browser settings that request that a web application disable its tracking of an individual user. While our Sites do not currently recognize Do-Not-Track signals, we do not track activities that occur on websites other than our own and declining to accept cookies will ensure that online activities on our Sites are not tracked.

#### **Changes to this Enterprise Privacy Notice:**

We may change this Enterprise Privacy Notice at any time. The most current version of this Enterprise Privacy Notice will be posted and available on the Sites. Any changes to this Enterprise Privacy Notice will be effective at the time we post the revised Enterprise Privacy Notice to the Sites. If we make material changes to how we treat your information, we will notify you through a notice on our Sites home page. Please review it periodically. Your use of the Site following any changes made means that you accept the revised Enterprise Privacy Notice.

#### **Contact Information:**

If you have any questions or comments about this Enterprise Privacy Notice, please do not hesitate to contact us at:

Website: <https://www.fnbo.com/contact-us/>

Email: [firstnational@fnni.com](mailto:firstnational@fnni.com)

First National Bank of Omaha  
1620 Dodge Street, Stop Code 3089  
Omaha, Nebraska 68102

### **WEX Statement Regarding Information Privacy and Data Security**

WEX Inc. (WEX) is committed to protecting the privacy of information supplied by users of WEX services. In the course of providing WEX's suite of products and services, we need to collect and maintain certain user information which may include nonpublic information.

This statement discloses the privacy practices for WEX and informs you about:

- what organization is collecting the information;
- what information is collected and from whom;
- how to correct, update or delete the information that WEX collects;
- how the information is used and disclosed to third parties; and
- what kind of security procedures are in place to protect the loss, misuse or alteration of information under the company's control.

#### General

WEX provides commercial card management, reporting and AP payment applications and services via internet-based technology. Our mailing address is 97 Darling Ave., South Portland, ME 04106, our telephone number is **207-773-8171** and our website can be found at [www.wexinc.com](http://www.wexinc.com) where you can learn more about our company.

Our services and use of this website are not intended for use by anyone under the age of 18 and WEX will not knowingly solicit or collect information from users under that age.

Our services are used to facilitate the management and reporting of card based financial transactions between Buyers and Sellers. The majority of our users typically are placed in one of the following categories, and collectively these are called the **"System Users"**:

1. Public and Private sectors clients and their authorized personnel (End Users); or
2. Financial Institutions who are providing the application through a licensing or contractual agreement to you.

In order to facilitate the usage of our application by End Users and Financial Issuers, some information is required to be obtained to allow access to the system, User IDs and profiles, transaction details and other similar information must be collected from the System Users and stored and shared between the parties.

#### Information Collection

WEX directly collects and stores a wide variety of information for both End Users and the card issuing financial institutions, including but not limited to organization and individual-user profile data (name, mailing address, email address, phone numbers, etc.), payment or financial account information (credit card account numbers, bank account information, etc.), and line item details for the goods and services that are bought and sold. Our servers automatically collect information about which sites users visit and which pages are viewed within the WEX website.

The only **Personally Identifiable Information (PII)** that we directly collect is information that you voluntarily provide to WEX via your financial issuer. If you supply WEX with personal information we will use that information to authenticate you, to contact you, or so that we can:

- Provide you access to the application and your card based transactional data,
- Provide you with information and /or reports you have requested, or
- Sending you other information that you have requested via extracts, reports or custom files.

In the event where PII is directly collected by WEX, (a) the user will have the choice over what information to submit and (b) it will be limited to the minimum amount of information needed to provide the services that have been requested.

Some PII that is directly collected by WEX may be edited or changed by the System User through the user's own maintenance of their profile and transaction information.

#### Information Use and Disclosure

WEX may, on occasion, share general information with its relationship partners. WEX may disclose information between System Users, or to WEX affiliates or vendors. In some cases, this may require PII to be sent to other countries and, by providing your information; you consent to your information being transferred across national borders.

Such disclosed PII shall be created and disclosed under strict conditions designed to safeguard the security and privacy of the PII. WEX policies limit access to personal user information that is collected to our employees and agents and the employees and/or agents of our affiliates and business partners who need the information to fulfill our obligations to you and their business responsibilities. Vendors and other outside contractors we engage are subject to WEX's contractual requirements for safeguarding sensitive information.

Employees and others with duties related to providing WEX services receive annual training about privacy policies and WEX security procedures and are subject to non-disclosure and employee agreements which specify remedies up to and including termination if they fail to comply with such policies.

From time to time, however, WEX may disclose this PII to fulfill legal or regulatory obligations or if we determine such disclosure is legally advisable or necessary to protect our rights, the rights of others, or to prevent harm. In addition, we may aggregate data about users of our site and use it for analytical purposes.

#### Use of Cookies



WEX makes use of a web browser technology called a “cookie”. The purpose of the cookie is to store session variables (information about a user and their transaction) while moving from page to page within the software applications, to enable user-preferences to be recorded, or to gather use information to enable us to improve the design or usability of the website. Most cookies are stored in Random Access Memory and are deleted when exiting the applications. If the cookie feature is disabled on the user's browser, the user will not be able to use the software properly.

#### External Internet Sites/Third Parties

Third party external sites may be reached or linked to through WEX's systems. Such sites may have their own Privacy Statements or Terms of Use and these terms from WEX do not apply. You are responsible for reviewing and accepting third-party terms. WEX specifically disclaims any responsibility for the content available on such sites or actions or events resulting from such interaction. Any access to other Internet sites is done solely at your own discretion and risk.

#### Data Security Measures

Protecting the confidentiality and integrity of our user's data is important to us. WEX maintains compliance with the PCI (Payment Card Industry) Data Security Standard and has enacted certain security methods and protocols that employ valid user identities, passwords, digital certificates; encryption, firewalls, and other measures that we believe meet or exceed the best in the industry. However, WEX does not represent and you acknowledge and agree that no system is 100% guaranteed to be secure from attack or other compromise.

#### Applicability

This privacy policy does not apply to information we collect through other methods or sources, including sites owned or operated by our affiliates, vendors or partners.

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#### Singapore Customer Security Awareness Information

##### A. Customer Privacy and Security Policy

WEX has an information privacy/data security policy, which can be viewed above. That policy:

- discloses privacy practices
- contains a brief summary of data security measures

#### Data Security

(1) For security reasons, only the last 4 digits of the respective credit card number are transmitted with the notifications. Furthermore, neither the first name nor the surname of the credit card holders (principal cardholders) is indicated. (2) Moreover, the wording of the SMS and/or email is as general as possible and always indicates a telephone number of the Service Centre as retransmission channel. The length of the message is restricted to 160 digits in case of SMS texts. Depending on the network operator

of the Corporate Card Holder, either the Company or a telephone number attributable by the network operator appears as the sender of the message.

## B. Customer Dispute Handling, Reporting and Resolution Procedures

### Policy Statement

Our goal is to handle all customer questions and complaints fairly, efficiently, and effectively, in compliance with applicable laws and regulations.

### How to raise a question or make a complaint

If you have a question or if you are dissatisfied with our provided product or services, you can raise your question or complaint by contacting us via the following channels:

- By telephoning us at +65 6808 5621
- By writing to us - WEX Singapore, #38-01 OCBC Centre Singapore 049513
- By completing the “Contact us” form on [our website](#)

If we receive a complaint verbally and consider it appropriate, we may ask you to put your complaint in writing.

### 6 steps we take once we have received your complaint

1. **We acknowledge:** Within three business days of receiving your complaint, we will acknowledge receipt of your complaint.
2. **We review:** We undertake an initial review of your complaint and may contact you to clarify details or request additional information where and when it’s necessary.
3. **We investigate:** Within 15 business days of receiving your complaint, we will investigate your complaint objectively and impartially by considering the information you have provided us.
4. **We respond:** Following our investigation, we will notify you of our findings and any actions we may have taken in regards to your complaint.
5. **We take action:** Where appropriate, we will amend our business practices or policies.
6. **We record:** We will record your complaint for continuous improvement. Your personal information will be recorded in accordance with the above Privacy Policy.

### Recording Complaints

When taking a complaint, we will record your information, which will actively be protected from disclosure, in accordance with our Privacy Policy.

### Complaint Escalation Process

Whenever possible, we will attempt to resolve your complaint at the first point of contact. If we are unable to resolve your complaint at the first point of contact, we will undertake an investigation of your complaint and provide you with our findings.

If you are not satisfied with how your complaint has been handled or the resolution we have provided, you can request that we escalate your complaint to the Singapore Civil courts or an alternative dispute resolution entity for independent external review.

WEX currently uses the MasterCard chargeback rules.

What you need to know about your liabilities

1. **Fraud on your account(s)**

Subject to the terms of your agreement with WEX, you will be responsible for all fraud on your accounts, unless and until you report fraudulent activity or lost or stolen Cards to WEX at the number or addresses provided to you.

2. **Unauthorised access to SMS and/or emails**

You are responsible for ensuring that no unauthorized person has access to your SMS and/or emails (your username and/or password). WEX does not assume any liability for the security of messages received on your mobile phone or in your email box

3. **Correctness of the information contained in the SMS and/or emails**

Furthermore, WEX does not assume any liability for the correctness of the information contained in the SMS and/or emails and their proper transmission. This, in particular, also applies in the case that your chosen email provider erroneously identifies your email as a so-called "spam email" and cancels it either automatically or upon or after notifying you.