

Old Glory Holding Company
Ownership Portal Privacy Policy

Updated: October 1, 2024

Welcome to Old Glory Holding Company (“Old Glory” or “we”, “us” or “our”), the bank holding company for Old Glory Bank. We respect your privacy, security, and liberty. This Privacy Policy (“Policy”) describes how we collect, use, protect and disclose Personal Data (as defined below) in connection with your use of our website at <http://own.oldglorybank.com/>, along with the features, functionalities, applications, browser extensions and other services available through this website (this “Website”); and personal information we may obtain from any Social Site connected to our Website or where we post content or invite your feedback or participation, including, without limitation, Facebook, X, YouTube, and LinkedIn (collectively, “Social Sites” and, together with our Website, our “Portal”). Our website for the operation of Old Glory Bank, including mobile banking, at www.oldglorybank.com has different privacy policies and is not covered by this Policy.

You can access and interact with our Portal in many ways, including from a computer or mobile device. This Policy applies regardless of how you access or interact with our Portal. Depending on how you interact with our Portal, there may be some cases where we need to provide you with additional information about how we collect, use, protect, or disclose your Personal Data and/or what options you have regarding our collection, use, or disclosure of your Personal Data. We may provide this additional information through notices on our Portal or via direct communications with you. If we do this, unless we tell you otherwise, the additional information provided in those notices will apply in addition to what is described in this Policy.

Please read this Policy carefully. If you do not want us to collect, use, or disclose your Personal Data (as defined below) in the ways described in this Policy, please do not use or otherwise interact with our Portal, provide us with your Personal Data, or authorize any third party to make your Personal Data available to us. By using or interacting with our Portal, you acknowledge that you understand that we may use your Personal Data as described in this Policy. If you have any questions about how we collect, use, protect, or disclose your Personal Data in connection with our Portal, please contact us by email at privacy@oldglorybank.com.

1. PERSONAL DATA AND OTHER INFORMATION WE MAY COLLECT

Our primary goal in collecting your Personal Data is to provide and improve our Portal, conduct our Regulation A (Tier II) Offering described in our Offering Circular available on this Portal (our “Offering”), and communicate with you and enable visitors to our Portal to easily navigate and enjoy them.

When we refer to “Personal Data” in this Policy, we mean information that identifies, relates to, describes, or is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, to a specific person. This might be information that directly identifies someone, such as their name, or it may be information that identifies someone only when combined with other information available to us, such as a person’s activity on our Portal when associated with their username. Please note, except as provided under applicable laws, Personal Data does not include

information that is publicly available through government records or information that has been de-identified or aggregated in a way that it cannot be used to identify a specific individual.

- i. **Categories of Personal Data We Collect** Depending on how you access, use, or otherwise interact with our Portal, we, our broker in this Offering (Rialto Markets, LLC), and other third parties acting on our behalf, such as merchant processors for credit/debit cards (our “Authorized Third Parties”), may collect the following categories of Personal Data about you:
 - a. Identifiers and contact information, such as your real name, alias, birthday, email address, telephone number, postal address, physical address, unique personal identifier, government-issued identification number, online identifier, IP address, and other similar information;
 - b. Financial information you want to use for purposes of your investment, including your bank account number, credit card number, or debit card number;
 - c. Transactional information, such as information about purchases you have made or participated in through our Portal for our Offering;
 - d. Internet and other similar network activity information, such as your browsing history, search history, interactions with the online portions of our Portal and online advertisements, and other similar information;
 - e. Communication information, such as information contained in voice mails, chats, emails, and other similar information;
 - f. Location information, such as where you live, where you are located, and other similar information; and
 - g. Other information you provide to us.
- ii. **Other Information We Collect.** We, or Authorized Third Parties, may collect certain information about the device you use when you visit or otherwise interact with our Portal and through the use of cookies, pixels, and other web technologies (collectively, “Usage Data”). Usage Data, by itself, generally does not identify the specific person using the device that generated it. This means that Usage Data usually will not be considered Personal Data, and our use of such Usage Data is not subject to this Policy unless required pursuant to applicable law. However, if we link Usage Data directly with other Personal Data or other information that could identify you, we will treat the linked Usage Data as Personal Data and use the linked Usage Data as described in this Policy.

Depending on how you interact with our Portal, the Usage Data that we, or Authorized Third Parties acting on our behalf, may collect may include:

- a. Device information, such as the IP address, general geographic location, operating system, browser type, language preferences, mobile phone

number, device identifier, and other similar information associated with a device used to access, use, or interact with our Portal;

- b. Information about online interactions with our Portal, such as links that are clicked, pages or screens that are viewed, access and session times, interactions with emails we send, and other similar information associated with a device used to access, use or interact with our Portal;
- c. Information about internet and network activity, such as Website visited, search engine results, and similar information associated with a device that accesses or interacts with our Portal online;
- d. Other information automatically collected by cookies and other technologies on our Portal; and
- e. Any other information that a browser or device automatically sends whenever connected to a website or an online application.

2. HOW WE COLLECT PERSONAL DATA

A large portion of the Personal Data we, or third parties acting on our behalf, collect is directly from you and other users who provide their Personal Data to us directly. In some cases, we may collect Personal Data from third parties in the ways described in this Policy.

- i. **Directly from You.** When you access, use, or otherwise interact with our Portal, or otherwise engage with us in connection with our Portal, such as requesting more information about Old Glory Bank and our Offering, communicating with us, accessing, using, or otherwise interacting with our Portal, we may ask you to provide certain Personal Data. Some of the Personal Data we request with respect to certain features of our Portal may not be required; however, we will let you know if specific Personal Data is required to use those features. If you do not provide us with the Personal Data required to use a certain feature on our Portal, you will not be able to use that feature, especially those features where we are legally required to collect Personal Data and those where it is impossible for the feature to operate without the required Personal Data (e.g., collecting your payment information in order to process your investment in our Offering).
- ii. **From Third Parties.** We may collect Personal Data about you from third parties, including, without limitation, online and offline sources, entities affiliated with us, our service providers, social media Portals, advertising networks, and other public or commercial sources (collectively, "Social Sites"). The collection of Personal Data from these Social Sites can occur in a variety of ways, including, without limitation:
 - a. By sharing our content via Social Sites or accessing, using, or interacting with our Portal through Social Sites, you acknowledge that we may collect, share, store, and use any Personal Data we receive from those Social Sites about you. In some cases, you may be able to revoke our access to your Personal Data and other content and information we receive from Social

Sites by changing the appropriate settings for your account with the applicable Social Site.

- b. We may receive Personal Data about you from our Affiliate, Old Glory Bank. This Personal Data may include, without limitation, information related to your access, use, or interaction with your mobile banking at Old Glory Bank.
- c. We may also receive Personal Data about you from other third parties, such as other users of our Portal and those that refer you to our Portal.

Please note that we may combine the Personal Data and other content and information we receive about you from multiple sources, including, without limitation, Personal Data we collect directly from you and one or more Social Sites.

3. HOW WE COLLECT USAGE DATA

We collect Usage Data in a variety of ways. Some Usage Data, such as the IP address of a device attempting to access, use or interact with our Portal, is necessary for us to make certain portions of our Portal available. Other Usage Data, such as information about which features of our Portal are popular, helps us improve and advertise our Portal. This section describes the primary ways Usage Data is collected in connection with our Portal.

- i. The systems we use to make our Portal available to you. When you access, use, or interact with our Portal, these systems automatically record certain information that your browser or device sends whenever you visit a website or utilize an online application, such as information about how long your device is connected to our Portal and the activities that device engages in while connected.
- ii. Cookies are small data files that are uploaded to the hard drive or other storage location of devices that access, use, or interact with our Portal. Among other things, cookies help us improve our Portal and our users' experience. We use cookies to see which areas and features are popular and to understand the usage of our Portal. We use first party cookies, served directly by us to the devices that access our Portal, to recognize devices when they revisit our Portal. We also use third party cookies, which are cookies that are placed by other parties we work with. These parties may upload unique cookies to your device to collect information about your use of our Portal and potentially other online activities you engage in over time across different Websites and other online applications. The Options/Settings section of most internet browsers will tell you how to manage cookies and other technologies that may be uploaded to your device, including how to disable such technologies. You can Manage Cookie Preferences [here](#), or you can disable our cookies, or all cookies, through your browser settings, but please note that disabling cookies may impact some of the features of our Portal and prevent them from operating as intended. You can learn more about cookies, including how to see what cookies have been uploaded to your device and how to manage and delete them, by visiting <https://www.allaboutcookies.org/>.

- iii. Other tracking technologies, such as web beacons, clear gifs, and pixel tags. These technologies may be used on or in connection with our Portal, including, without limitation, in emails we send. We may use these technologies to deliver cookies, count visits, understand usage and observe data on email delivery, open rates, click rates, bounces, unsubscribes and other information.

Please note that our Portal does not have a response to browser “Do Not Track” signals and does not change any of our data collection practices when we receive such signals.

4. HOW WE USE PERSONAL DATA

We use Personal Data solely to operate and improve our Portal, to conduct our Offering, and to market to you our banking products and services and maybe the products and services of certain joint marketing partners that we like. If you link to our bank website at www.oldglorybank.com, please refer to the privacy policy for our mobile banking. We may use your Personal Data for non-marketing purposes, including: (1) operating and improving our Portal; (2) validating your identity; (3) carrying out our obligations and enforcing our rights arising from any contracts we have entered into, including without limitation, any contracts between you and us; (4) sending you emails to provide you with alerts and updates about your engagement with our Portal and/or participation in our Offering; (5) complying with legal and regulatory requirements; (6) customizing your experience with our Portal; (7) protecting and defending Old Glory against legal actions or claims; (8) preventing fraud; and (9) those you authorize or instruct us to do.

5. HOW TO MANAGE YOUR PERSONAL DATA

We offer you several choices with respect to how we use your Personal Data. The mechanisms available to you to control the Personal Data are:

- i. To update any Personal Data you have provided us, update your preferences or otherwise contact us about our use of your Personal Data, please email us at privacy@oldglorybank.com.
- ii. To manage the communications we send you:
 - a. For marketing and other promotional email communications you receive from us, you can opt-out of receiving such communications by following the unsubscribe instructions contained in most email messages from us. Your unsubscribe request or email preference changes will be processed promptly, though this process may take several days. During that processing period, you may receive additional marketing and other promotional emails from us. Please note that opting out of these communications will only apply to marketing and other promotional emails and will not apply to any email or other communications we send you for non-marketing purposes, including, but not limited to, emails and other communications about your orders and other interactions with our Portal.
 - b. If you have provided us with your prior express consent to receive text messages via an automatic telephone system (autodialer), we may use your

information to send promotional, personalized advertising and other text messages to any mobile device connected to your mobile phone number. You can opt out of receiving future text messages at any time by replying STOP to any text messages you receive from us or sending us an email at privacy@oldglorybank.com with the subject line "STOP" and including your phone number in the email. Once you opt-out, we will send one additional confirmation text message stating that you have opted out of receiving automated text messages from us.

- iii. If you do not want us to use your Personal Data to deliver targeted advertisements to you according to our target audience preferences, you can opt-out by sending us an email with your request to privacy@oldglorybank.com.
- iv. Subject to certain exceptions, you can request that we delete any of your Personal Data that we collected and retained through or in connection with certain Social Sites. Once we receive and confirm your request to delete your applicable Personal Data, we will delete your applicable Personal Data from our records unless an exception applies. Please note, that we may deny your deletion request under certain circumstances and will inform you of the basis for the denial, which may include, without limitation, in circumstances where retaining your Personal Data is necessary for us or our service providers to:
 - a. Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
 - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - c. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - d. Comply with a legal obligation.
 - e. Make other internal and lawful uses of that Personal Data that are compatible with the context in which you provided it.
- v. To request deletion of your Personal Data, please submit a request to us by emailing us at privacy@oldglorybank.com. Only you or a party that you authorized on your behalf may make a request related to the deletion of your Personal Data. You may also make a request on behalf of your minor child. Your request for deletion must:
 - a. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized representative.
 - b. Describe your request with sufficient detail that allows us to understand, evaluate, and respond to it properly.

- vi. We cannot respond to your request or delete your Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you.
- vii. Making a request does not require you to create an account with us, and we will only use Personal Data provided in connection with a request for deletion to verify the requestor's identity or authority to make the request.
- viii. We endeavor to respond to deletion requests within a reasonable time period after we receive the request. If we are unable to fully comply with your request to delete your applicable Personal Data, our response will explain the reasons why we are unable to fully fulfill your request.

6. PROTECTING YOUR PERSONAL DATA

We are committed to protecting the security of your Personal Data. We maintain commercially reasonable safeguards to maintain the security and privacy of the Personal Data we collect and use in connection with our Portal. Nevertheless, when disclosing Personal Data, you should remain mindful that there is an inherent risk in the transmission of information via the Internet and mobile Portals. Such risk includes but is not limited to profile pictures and stories videos being accessed and "scraped" by third-party Websites and made publicly available on non-Old Glory Websites and databases without our knowledge or consent; accordingly, you agree to release and hold Old Glory harmless for any third-party use of your Personal Data (including profile pictures and stories videos). Although we take precautions to protect against the risk of unauthorized access to your Personal Data, we cannot guarantee the security of any information, including your Personal Data, that you disclose online, and you do so at your own risk.

7. CHILDREN'S PRIVACY

We do not direct or target any piece of our Portal to children under the age of 13. If we learn that we have collected the Personal Data of anyone under the age of 13, we will take appropriate steps to delete this information. If you are a parent or guardian of someone under the age of 13 and discover that your child has submitted Personal Data to us, please contact us at privacy@oldglorybank.com. We will make reasonable efforts to remove such information from our databases.

8. CALIFORNIA PRIVACY RIGHTS

If you are a California resident, under California's Shine the Light Law (California Civil Code Section 1798.83), you have the right to request the following information regarding our disclosure of your personal information to third parties for direct marketing purposes: (i) the categories of personal information we disclosed to third parties for their direct marketing purposes during the preceding calendar year; (ii) the names and addresses of the third parties that received the information; and (iii) if the nature of the third party's business cannot be determined from their name, examples of the products or services they marketed. This information may be provided in a standardized form that is not specific to you.

You are permitted to obtain this information from us once a year, free of charge. To make such a request, please submit your request in writing to:

Old Glory Holding Company
Attn: CA Privacy Rights Request
P.O. Box 20550
Oklahoma City, OK 73156

9. INTERNATIONAL TRANSFERS

Personal Data collected in connection with the use and operation of our Portal is stored and processed in the United States. If you access, use, or otherwise interact with our Portal or otherwise engage with us from outside the United States, please be advised that your personal information may be initially collected by servers located in the United States or, if initially collected outside the United States, transferred to the United States. Please note that the United States has not been assessed as having adequate privacy laws by some countries and economic regions.

10. CHANGES AND UPDATES TO THIS POLICY

Because the methods used to protect your Personal Data and the services we provide are continually evolving, this Policy may change at any time. Unless otherwise noted, those changes will be effective as soon as they are posted. If changes are made to this Policy, we will make it known on our Portal and will indicate the last date it was updated above. Please check back periodically to see if our Policy has been updated.

Your continued use of our Portal after any changes to this Policy become effective constitutes your continued acknowledgment that you understand that we may continue to use your Personal Data as described in this Policy.

11. CONTACT US

We welcome your questions, comments and concerns about privacy. Please email us at privacy@oldglorybank.com with any questions or feedback you have pertaining to our privacy practices.

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