

EverBank Ethics Helpline Supplementary Privacy Notice and Consent

Welcome to the EverBank Ethics Helpline (“Helpline,” which includes both the website and telephone reporting services). The Helpline is a voluntary reporting system operated by OneTrust, a third-party service provider, that manages the OneTrust Ethics Convercent Application (collectively “Convercent”) for the benefit of EverBank, N.A. and its affiliates (“EverBank”, “us”, “our”, “we”). The purpose of this Helpline is to allow EverBank associates, contractors, and third parties to report suspected violations of applicable laws, regulations, and company policies including those relating, but not limited to financial and accounting matters; discrimination, harassment, and retaliation; bribery, unfair and deceptive practices, and fraud; and other alleged misconduct.

You are being asked to consent to the terms outlined in this Supplementary Privacy Notice and Consent (“Notice”) in connection with your use of the Helpline. If you do not wish to accept the terms, we will be unable to accept any information through the Helpline. Depending on the nature of the issue, you can instead report your concern directly to any EverBank manager, Ethics Compliance, or Human Resources.

We ask that you provide information that, to the best of your knowledge, is correct and factual. You will not be subject to retaliation from EverBank for any report of a suspected legal, compliance, or ethical violation that is made in good faith, even if it later turns out to be incorrect. We take all reports of retaliation seriously and will investigate the claims. If the ensuing investigation finds retaliation took place, the offender will be subject to disciplinary action, up to and including the termination of employment. Please be aware that knowingly providing false or misleading information will not be tolerated and can result in criminal liability in some jurisdictions.

This Notice describes how EverBank collects and uses your personal information when you use the Helpline.

The EverBank privacy notices identified below govern the collection and processing of any personal information in relation to the Helpline and your reporting of issues through other mechanisms listed based on your relationship with EverBank. In addition, the following supplementary terms also apply specifically to your use of the Helpline:

Supplementary Privacy Notice Terms

1. What personal information do we collect when you use the Helpline?

You remain in control of what personal information is collected by the Helpline, based on the Report Type you select when making a report, as detailed in the following table:

Report Type	Personal Information Processed <i>(elements at your election)</i>
Share contact information	Name, email address, phone numbers, descriptions of yourself or others involved in your issue description and personal information in any photos or files uploaded.
Remain anonymous towards EverBank	As per Share contact information row but the ‘Tell us about yourself’ personal information is only processed by Convercent. Note that if you enter your personal information in the issue description it will be processed by EverBank.
Remain completely anonymous	No personal information will be processed providing you enter no personal information in the free text fields and do not enter your email address to receive email updates.

2. Processing your personal information

The information you provide through the Helpline will be stored on servers hosted by Convercent, a third-party service provider, in the United States. All information you report to us, including your contact details, are treated confidentially and will not be further disclosed outside of Convercent and EverBank unless disclosure is required or necessary in connection with any resulting investigative or court proceedings or otherwise mandated by applicable law. Subject to those exceptions, the information with the Helpline database may only be reviewed and used by those representatives of Convercent and EverBank who need to access the information to fulfill their job duties. These individuals may include appropriate EverBank associates in the Legal, Compliance, or Human Resources departments, personnel performing Finance, IT, or Audit functions for EverBank, external EverBank advisors retained in investigation the report (e.g., attorneys, forensics providers), or technical staff at Convercent. Individuals reviewing the report may be located in the United States and any country where any individual in this process may be located. In addition, some or all of the information you provide us during the call, in an online report, or during the course of an investigation may be stored on EverBank systems in the United States.

Please note that because of applicable laws, individuals may be informed that they have been identified in a report made through the Helpline. However, to the extent reasonably possible, EverBank will not reveal your name or identity.

3. Purposes of processing

The purpose of this Helpline is to allow EverBank associates, contractors, and third parties to report suspected violations of applicable laws, regulations, and company policies relating to financial, accounting, auditing, or bribery matters.

4. Retention and Security

Any information you submit may be deleted or archived, according to EverBank's records retention schedules and as permitted by local law, after EverBank has completed its investigation or if the information is not needed in the investigation. EverBank also requires Convercent to adequately secure your personal information and not use it for any unauthorized purposes.

5. Where can I find out more information and contact EverBank with any questions?

For additional information on EverBank's use of your personal information:

- If you are an EverBank associate or contractor, please see our Associate Privacy Notice.
- If you are a candidate or applicant for employment, please see our [Applicant Privacy Notice](#).
- All others, please see our Notice of Online Privacy Practices at everbank.com/legal/privacy.

Certain countries outside of the United States may have special requirements and restrictions on reporting and issues may not be reportable through the Helpline. If you are outside of the United States or reporting about an issue that occurred outside of the United States, please contact a representative of HR, Legal, or Compliance should you have any questions.

The Helpline is OneTrust's Ethics Convercent Application and is subject to Convercent's privacy notice and terms and conditions.