

Digital media channels help us connect with our clients (current or future), stakeholders, media and followers in a more convenient and accessible way. Because these digital media channels (our website and official social media accounts) are based on interactive platforms that allow the exchange of information between First BanCorp. and users, First BanCorp. (hereinafter refer as “we” or “us”) has created this Online Privacy Policy that informs and explains how we may collect, share, use, and/or protect your online information when you visit or use any online services offered by First BanCorp., its affiliates and subsidiaries such as: FirstBank; FirstBank Insurance Agency, Inc.; First Federal Finance Corp. (d/b/a Money Express La Financiera); First Management of Puerto Rico; FirstBank Puerto Rico Securities Corp.; and FirstBank Overseas Corporation.

This policy covers First BanCorp.'s online services, including, but not limited to: websites, mobile applications, and First BanCorp.'s branded social media sites, as well as any interaction a person may have while viewing the content provided through one of First BanCorp.'s digital efforts. This Online Privacy Policy works in conjunction with First BanCorp.'s Privacy Policy which also describes how we collect and use your non-public information and also gives you a chance to opt-out of any sharing of information the Bank may have between its affiliates and subsidiaries. To view First BanCorp.'s Privacy Policy, [click here](#).

In addition, keep in mind that we may use third-party platforms (Mailchimp, social media platforms, etc.) as part of our online services or communications and these may have additional terms and conditions and privacy policies that could apply. We encourage you to review them before engaging with us through one of these platforms so you understand how your online information may be collected, used or shared.

Children's Online Privacy Protection Rule ("COPPA")

COPPA imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age. First BanCorp.'s digital efforts are not intended for children under 13 years old and we do not knowingly collect personal information from them without parental consent.

What type of information we collect?

Whenever you interact with us through a digital media channel, you must keep in mind that we may collect personal information about you. The information you provide will be used in accordance with the terms and conditions of the agreements which you have entered with us and in accordance with pertinent regulations and legislation in the United States of America, the Commonwealth of Puerto Rico, and the Organized Territory of the United States Virgin Islands or the United Kingdom, as applicable.

This information could be, but is not limited to:

- *Personal information*
 - Name, social security number, driver's license number, email address, mailing address, telephone number(s), limited location information (For example, access to your mobile phone GPS or zip code to locate nearest ATM), date of birth, household income
- *Product or services information*
 - Account numbers, payment card information, username and password
- *Usage information*
 - Information other than Personal Information that does not reveal your specific identity or does not directly relate to an individual, such as browser information, IP address of the device you use, which pages of our website you visit, interest and affinities based on your browsing behavior, websites visited before and after visiting First BanCorp.'s websites, information collected through cookies, pixel tags and other technologies, demographic information, other information provided by you such as your date of birth or household income, and aggregated and de-identified data.
- *Mobile information*
 - Unique device identifiers for your mobile device, screen resolution and other device settings, location, and analytical information about how you use your mobile device.

How do we collect your online information?

Because we are constantly optimizing and improving our digital media efforts, we may use multiple tools to capture a snapshot of the user visiting or interacting with our online platforms. Some of these tools, include:

- Cookies, pixel tags, web beacons, clear GIF's, and other tracking technologies

In addition to these technologies, we may also use other online and offline sources like partner sites or other commercially available sources, such as credit reporting agencies. The information collected through these sources may be combined with information we may already have collected about you that is protected under First BanCorp.'s Privacy Policy.

How Information is shared

We may use your information for various purposes. Because of this, we may need to share your information with our affiliates and other third parties. However, Federal law gives you the right to limit some but not all sharing of your information. Federal law also requires us to tell you how we collect, share, and protect your personal information. For example, we may disclose your nonpublic personal information:

- With your consent or at your direction, provided that the you don't revoke the consent or direction;
- With a third-party service provider to perform services on our behalf, if we provide an initial notice that accurately reflects our privacy policies and practices; and with whom we share a contractual agreement that prohibits the third party from disclosing or using the information other than to carry out the purposes for which we have disclosed.
- With our affiliates and subsidiaries for everyday business purposes, such as to effect, administer, or enforce a transaction that you have requested or authorized.
- To protect the confidentiality or security of our records pertaining to your services, products, or transactions;
- To protect against or prevent actual or potential fraud, unauthorized transactions, claims, or other liability;

- For required institutional risk control or for resolving consumer disputes or inquiries;
- With persons holding a legal or beneficial interest relating to you; or with persons acting in a fiduciary or representative capacity on your behalf;
- With other third parties in connection with a proposed or actual sale, merger, transfer, or exchange of all or a portion of First BanCorp.;
- With other third parties to comply with Federal, state, or local laws, rules and other applicable legal requirements such as a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by Federal, state, or local authorities; or to respond to judicial process or government regulatory authorities having jurisdiction over you for examination, compliance, or other purposes as authorized by law;
- With a consumer reporting agency in accordance with the Fair Credit Reporting Act;
- From a consumer report reported by a consumer reporting agency;
- With an insurance rate advisory organization, guaranty funds or agencies, agencies that are rating you, persons that are assessing your compliance with industry standards, and your attorneys, accountants, and auditors;

* **Note:** First BanCorp. does not share non-public personal information with non-affiliated third parties for marketing purposes, except as accepted by Federal regulation. Please see our First BanCorp.'s Privacy Notice at 1firstbank.com for more information on what Personal Information may be shared and how you may limit certain types of sharing of your information.

Use of the Information Collected

Federal regulation states that we may use or disclose your information for marketing purposes if it has been previously disclosed in writing, in a clear and conspicuous manner, and you have not “opted out” or have prohibited us from using your information for marketing purposes after we’ve provided a reasonable opportunity and a reasonable method to “opt out”. For more information on how you can “opt-out” from information sharing for marketing purposes, please refer to First BanCorp.'s Privacy Notice.

Consequently, in our efforts to make our digital media channels more efficient, accessible and maintain them updated to current trends, we may use your information for, but not limited to:

- Verifying your identity;
- Updating our online services security features to maintain your information protected;
- Responding to a communication about our products or services;
- Optimizing our marketing efforts in an effort to provide more personalized content and messages;
- Cross-sell marketing activities and multi-channel marketing (email blasts, SMS ads, etc.);
- Managing your preferences;
- Analyzing usage of online services, website traffic, advertising response, etc. ;
- Enhancing our products and/or services to improve our business, creation of new products and/or services, and other internal processes;
- Complying with and enforcing applicable legal requirement, relevant industry standards and our policies;
- Any other purpose that First BanCorp. may feel necessary but will disclose at the time the user provides the information.

Online Marketing Efforts

We use diverse offline (e.g. banking centers, call centers, and direct marketing) and online media (e.g., pages within our Sites and mobile apps, social media, and on other sites and mobile apps not affiliated with First BanCorp.) to advertise our products and services. With the information collected from our digital media channels, we will target our advertisements depending on who do we want to reach. The type of

advertisement each user receives or sees could vary and will be influenced by the data collected and available for each user.

About Cookies, Web Beacons and Other Tracking Technologies

As mentioned, we, or our service providers, and other companies may deploy and use tracking technologies (cookies, web beacons, local shared objects and other) for diverse objectives to help us optimize and enhance our offerings. Some of these tracking tools or technologies may have the ability to capture certain information about the device used to access our digital media channels and how they were used. Below you'll find a description of some of the tracking tools and technologies we use to collect your information:

- *“Cookies”*
 - Small pieces of data that are generated from a website and stored in the user's browser and/or device. These small pieces of data or “Cookies”, allow us to gather information such as browser type, time spent on the Site, pages visited, language preferences, and your relationship with us. The use of this information may vary from security purposes, navigation optimization, to understand the interests and affinities of the user, target specific content, remember certain information to facilitate the user experience, track the response to our marketing efforts, among others. For more information about how we use cookies for our marketing efforts, please see the Marketing section below.
 - Note: Users can refuse to accept these cookies and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Site and some online products and services.
- *Clear GIFs, pixel tags or web beacons*
 - In most cases, these are transparent graphic images (1 pixel by 1 pixel) that are placed on a website, email or other advertising piece. These technologies or similar tools may be used for marketing efforts. These could be found in our advertisements with the purpose of tracking the user's behavior while and after interacting with our message. They are also used to capture information about traffic patterns, measure website or campaign engagement.

Marketing: How we tailor ads for our audience

Relationship based advertising – In order to help 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 we may present to you.

Online Behavioral Advertising (OBA) – Online behavioral advertising (also known as “OBA” or “interest-based advertising”) refers to the practice of collecting information from a computer or device regarding a visitor's web-browsing activities across non-affiliated websites over time in order to deliver advertisements that may be of interest to that visitor based on their browsing history. We or our advertising service providers may use certain information about your activities on our Sites, 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 of information for specific purposes by advertising service providers. We may use this online information for online and offline advertising. You may determine if your information is available to use for these purposes. If you do not want to share your information for OBA purposes, you may opt out by following the instructions in the next section.

Opting Out of Online Behavioral Advertising (OBA)

Certain First BanCorp. ads on third-party websites feature an Advertising Options Icon , that when clicked, describes the collection and uses of data gathered at the relevant third-party website and provides a way for you to opt out of data collection and use by the third parties listed for the purposes of OBA.

If you choose to opt out, our service provider will communicate your opt out election to the relevant third-party advertising partners and a cookie will be placed on your browser indicating your decision to opt out. Remember that you will have to do this with each browser you use to navigate on all the devices used.

Note: Even if you opt out of OBA, you may still receive advertisements from us; they just won't be customized based on your web-browsing activities on third-party websites.

Social media sites

First BanCorp. provides experiences on social media platforms including, but not limited to, Facebook, Twitter, YouTube, Spotify, Instagram and LinkedIn that enable online sharing and collaboration among users who have registered to use them. Any content you post on official First BanCorp. managed social media accounts, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms.

Please refer to them to better understand your rights and obligations with regard to such content. In addition, please note that when visiting any official First BanCorp. social media pages, you are also subject to First BanCorp.'s Privacy Notices, Social Media User Terms and Community Guidelines.

In order to keep your information protected, First BanCorp will never ask a user to post or publish personal or sensitive information in a public forum. Keep in mind that any information you publish in a First BanCorp social media account public space will be available for other to see and could be subject to abuse.

Opting Out of Email Marketing

In order to comply with the CAN SPAM Act, all of First BanCorp.'s emails sent with/for a marketing purpose feature an "unsubscribe" alternative for the customer. By doing so, you agree to not receive **any** of our email marketing efforts, regardless of the product or message sent. If you wish to do so, the button is located at the lower right part of each communication. When clicked, the link will take you to our third party email platform, where it will ask you to confirm your un-subscription. Once you do so, you will stop receiving further marketing emails from our end.

Linking to Third-Party Websites

We may provide links to websites that are owned or operated by other companies ("third-party websites"). If you encounter a link on our website that takes you out of our property, you will be notified. If you are engaging with us in any other digital media channel, this could not necessarily be mandatory. Remember to review the third-party terms of use, privacy policy, and security practices to ensure that your information is safe.

Security

At First BanCorp., we are always working to maintain your information secure. This will include the use of physical and electronic safeguards that are in compliance with federal standards. If you wish to learn more about our security standards, please visit our Security section in our Help Center.

Remember that there are various ways in which you can send or share information with us through digital media channels and not all of these ways may be secure. Be aware of the channels used to share your information and always use secured channels to share personal or sensitive information.

Updating Your Information

It is important that you maintain your information updated. To do so, you may use our Online Banking platform (if the user is registered in this service) or use the “Contact Us” feature through our FirstService Line. You can also call our First Line Solutions Center at 787.725.2511 or toll free at 1-866.695.2511

Changes to this Online Privacy Policy

This Online Privacy Policy may be updated periodically to adjust to the changes in technology and communication tools. When updated, we'll notify our users through the use of diverse channels, such as our website, social media postings, e-mails, among others.