



CALIFORNIA BANK OF COMMERCE

CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE

Effective Date: January 1, 2020

INTRODUCTION

California Bank of Commerce (“CBC” or “we”) is committed to protecting the privacy of personal information of individuals. This Privacy Notice supplements the information contained in the CBC Privacy Policy and applies to residents of the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended. Any terms defined in the CCPA have the same meaning when we use them in this notice.

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

INFORMATION WE COLLECT

In order to meet your banking and financial service needs, we may collect, use or share personal information from the following categories:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
- Personal information categories listed in the California Records statute including categories such as a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
- Characteristics of protected classifications under California or federal law such as gender and race.
- Commercial information, including personal property records, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with a website, application, or advertisement.
- Geolocation data.

- Sensory data such as audio, electronic, visual or similar information.
- Professional or employment-related information such as current or past job history.
- Education information.

We obtain the personal information above from the following sources:

- Directly or indirectly from you such as documents provided to us related to your business relationship with us.
- Directly and indirectly from activity on our website, such as submissions by you or website usage details we collect automatically.
- From third-parties that interact with us in connection with the products and services we provide such as credit bureaus.

USE OF PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information was provided. For example, if you provide your personal information to obtain a product or service, we will use that information to process your request.
- If you, your employer or another entity with whom we do business, shares your name and contact information to request a financial product or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop our websites, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests.
- To help maintain the safety, security, and integrity of our business websites, products and services, databases and other technology assets.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

SHARING PERSONAL INFORMATION

We may share your personal information with third parties for business purposes. When we share personal information, we enter a contract with the third party or service provider that describes the purpose of the shared information and requires the recipient to keep it confidential, ensure its protection, and to prohibit its use for any purpose except as required to perform the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Third Parties to whom you authorize us, directly or indirectly, to disclose your personal information in connection to products or services we provide to you.
- Government or regulatory authorities.

Sale of information: In the last 12 months we have “sold” (shared) website visitor information, such as IP address and Geo location, in order to provide you digital advertisements.

YOUR RIGHTS AND CHOICES

The CCPA provides you with specific rights regarding your personal information.

Access to Specific Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months and to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months.

Once we receive and confirm a verifiable request we will disclose to you:

- The categories of Personal Information about you that we collected.
- The categories of sources from which the Personal Information was collected.
- The business or commercial purpose for collecting Personal Information about you.
- The categories of third parties with whom we shared Personal Information about you.
- The categories of Personal Information that was disclosed or shared with a third party for a business purpose.
- The specific pieces of Personal Information we collected about you.

Deletion Rights

You have the right to request we delete any of your personal information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if an exception applies, such as regulatory obligations or required for servicing the account.

Do Not Sell

You have the right to opt-out of the sale of your personal information by us. Currently, CBC does not sell personal information. If in the future CBC chooses to sell the personal information, it will provide notice and opportunity to opt-out. By default those known to be under the age of 16 would be opted out of the sale of their personal information.

Response Timing

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will cover the 12-month period preceding receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you products or services.
- Charge you different fees or rates for products or services, including through granting discounts or other benefits, or imposing penalties.

- Provide you a different level or quality of products or services.
- Suggest that you may receive a different fee or rate for products or services or a different level or quality of products or services.

PRIVACY NOTICES CHANGES

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice we will notify you through a notice on our website homepage.

CONTACT INFORMATION

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: privacy@bankcbc.com

Phone: 925-283-2265

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