



CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY AND NOTICE

Effective Date: January 1, 2023

INTRODUCTION

California Bank of Commerce ("CBC", "we" or "us") 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 policy and notice to comply with the California Consumer Privacy Act of 2018 (CCPA) as modified by the California Privacy Rights Act of 2020 (CPRA). Any terms defined in the CCPA have the same meaning when we use them in this notice.

Personal Information under the CCPA is information that identifies, relates to, or could reasonably be linked directly or indirectly with a California resident. The specific Personal Information that CBC collects, uses, and discloses covered by the CCPA will vary based on your relationship or interaction with us.

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - 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.

YOUR RIGHTS UNDER THE CCPA

The CCPA provides you with specific rights regarding your Personal Information.

Right to know - You may be entitled to request that we disclose to you Personal Information we have collected about you, the categories of sources from which we collected the information, the purposes of collecting the information, the categories of third parties with whom we have shared the information, and the categories of Personal Information that we have shared with third parties for a business purpose. You may make a request to know up to twice a year.

Right to delete – You may request that we delete personal information collected from you and to tell service providers to do the same. However, there are many exceptions that allow us to keep your Personal Information. Before deleting information, we must be able to verify your identity. We will not delete Personal Information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law.

Right to opt-out of sale or sharing - We currently do not sell or share Personal Information to third parties within the meaning of the CCPA, and therefore do not offer this option. We may disclose Personal Information about you to our affiliates and service providers as permitted by law. Please see Our “Collection and Disclosure of Personal Information” section of this Policy for more information.

Right to correct – You may request that we correct your Personal Information that you believe is incorrect. Subject to other exceptions, we may not change the Personal Information if we believe that the information is more likely to be accurate than inaccurate. To make a correction request please see the “How to Make Requests” section below.

Right to Limit, Sensitive Personal Information - The CCPA grants you the right to limit use or disclosure of your Sensitive Personal Information (e.g. social security number, precise geolocation or ethnicity) to that which is necessary to perform the services reasonably expected by you in your request for those services and to perform activities permitted by the CCPA. We do not use or disclose Sensitive Personal Information for any purposes other than necessary to provide relevant services or as permitted by the CCPA, so no right to limit applies.

Right to Non-Discrimination for Exercising Rights - We will not discriminate against you if you choose to exercise your CCPA rights. Please see the “How to Make Requests” section below for details on how to exercise these rights.

COLLECTION AND DISCLOSURE OF PERSONAL INFORMATION

We do not share or disclose your information except as allowed by law. We share (disclose) information only with those vendors or third parties providing servicing of your products and services and require that they not sell, share, or use your information for any other purpose.

Notice at Collection	
Personal Information California Bank of Commerce Collects	
Categories of Information	How We Use Personal Information
Identifiers: A real name, alias, postal address, email address, unique personal identifier, online identifier, Internet Protocol address, account name, social security, driver’s license or passport number, or other similar identifiers.	<ul style="list-style-type: none">▪ To fulfill or meet the purpose for which you provided the information.▪ To provide you support and to support and respond to your inquiries.▪ To process your requests, transactions and payments and prevent transactional fraud.▪ Enable information security, detect security incidents and authenticate your identity.▪ To engage in or maintain an employment relationship with you or for other employment related purposes.▪ For payroll, tax and benefit purposes.▪ To support our audit, legal, regulatory, and compliance obligations.

<p>Personal Information: Personal information categories listed in California Customer Records statute (Cal. Civ. Code § 1798.80(e)): In addition to the identifiers above name, signature, state identification card number, physical characteristics or description, insurance policy number, education, employment or employment history, bank account number, credit card number, debit card number, or any other financial information or medical information or health insurance information.</p>	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ To process your requests, transactions and payments and prevent transactional fraud. ▪ Enable information security, detect security incidents and authenticate your identity. ▪ To engage in or maintain an employment relationship with you or for other employment related purposes. ▪ For payroll, tax and benefit purposes. ▪ To support our audit, legal, regulatory, and compliance obligations.
<p>Protected Classes Characteristics: Characteristics of protected classifications under California or federal law, such as race, national origin or gender.</p>	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ For Equal Opportunity Employment purposes. ▪ For Diversity and Inclusion programs. ▪ Investigate Complaints and Grievances. ▪ To support our audit, legal, regulatory, and compliance obligations.
<p>Commercial Information: Commercial information, including records of personal property, products and services purchased and purchasing habits.</p>	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ To process your requests, transactions and payments and prevent transactional fraud. ▪ Enable information security, detect security incidents and authenticate your identity. ▪ To support our audit, legal, regulatory, and compliance obligations.
<p>Internet or Online Information: Internet or other similar network activity, such as: Information regarding a consumer's interaction with a CBC website or application, browsing history or search history.</p>	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ To process your requests, transactions and payments and prevent transactional fraud. ▪ Enable information security, detect security incidents and authenticate your identity. ▪ To support our audit, legal, regulatory, and compliance obligations.
<p>Geolocation Data: Geolocation data, such as device or personal location.</p>	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ To process your requests, transactions and payments and prevent transactional fraud.

	<ul style="list-style-type: none"> ▪ Enable information security, detect security incidents, and authenticate your identity. ▪ To support our audit, legal, regulatory, and compliance obligations.
Sensory Data: Audio, electronic, visual, thermal, olfactory, or similar information.	<ul style="list-style-type: none"> ▪ To protect, detect, investigate, report and prevent financial crime. ▪ Support our audit, legal, regulatory, and compliance obligations, and exercise and defend legal rights. ▪ Maintain and service your account, including processing transactions. ▪ Enable information security, detect security incidents, authenticate your identity, and perform due diligence.
Professional or Employment-Related Information: Employment related records such as work history and prior employer.	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ Provide job related notifications, conduct research to assess job qualifications and employment processing. ▪ To support our audit, legal, regulatory, and compliance obligations.
Inferences: Inferences drawn from other personal information such as profiles reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ To process your requests, transactions and payments and prevent transactional fraud. ▪ To engage in or maintain an employment relationship with you or for other employment related purposes.
Sensitive Personal Information: Personal information that reveals social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation, health information, racial or ethnic origin, or union membership; contents of a consumer's mail, email, and text messages unless the CBC is the intended recipient of the communication.	<ul style="list-style-type: none"> ▪ To fulfill or meet the purpose for which you provided the information. ▪ To provide you support and to support and respond to your inquiries. ▪ To process your requests, transactions and payments and prevent transactional fraud. ▪ Enable information security, detect security incidents and authenticate your identity. ▪ To engage in or maintain an employment relationship with you or for other employment related purposes. ▪ For payroll, tax and benefit purposes. ▪ To support our audit, legal, regulatory, and compliance obligations.

"SELLING" AND "SHARING" OF PERSONAL INFORMATION UNDER THE CCPA

CBC does not sell or share your Personal Information as those terms are defined by the CCPA.

- In the previous 12 months CBC has not sold information about consumers.

- In the previous 12 months CBC has disclosed personal information to service providers for a business purpose to assist in providing products and services to you, to comply with legal or regulatory requirements and employment related purposes.

RETENTION OF PERSONAL INFORMATION

We retain your Personal Information, including your Sensitive Personal Information, for the period necessary to fulfill the purposes outlined in this notice unless a longer retention period is required or permitted by law. In many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against deceptive or illegal activity, or for another one of our business purposes.

RESPONSE TIMING

When exercising your rights, we try 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.

Once a request to access, delete, or correct has been submitted, we will attempt to verify that you are the consumer that the request applies to. We do so by taking the identifying information you provide and using a combination of the information we have on file. If we are unable to verify your request with the materials you provided, we may reach out to you for additional information.

CHANGES TO THIS CALIFORNIA CONSUMER PRIVACY ACT POLICY

California Bank of Commerce may make periodic changes to CBC's CCPA Policy. When these changes occur, CBC will post the new policy on our website and change the "Last Updated" date. When appropriate, CBC may notify you through other means.

HOW TO MAKE REQUESTS - 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:

Phone: 833-869-0492

Email: privacy@bankcbc.com

California Bank of Commerce
Attn: CCPA Requests
2999 Oak Road Suite 210
Walnut Creek, CA 94597

Website: <https://www.californiabankofcommerce.com/california-consumer-privacy-act>