

California Consumer Privacy Act Notice

Last updated May 2024

Your privacy is important to us and keeping your personal information secure is one of our most important priorities.

This California Consumer Privacy Act Notice (“Notice”) explains how the Bank of Whittier, N.A. (“Bank” or “We”) collects, uses, retains, and discloses personal information about California residents. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). This “Notice” constitutes our notice at collection and our privacy policy pursuant to the CCPA.

Introduction

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident or household. This Notice applies to personal information we collect online and offline, such as when you apply for our products or services, use our websites or applications, contact customer support, when you visit our offices or attend a Bank of Whittier’s event, or otherwise interact with us. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”).

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. The Bank may, from time to time, make changes to this Notice. If we do make changes to the Notice, we will let you know by posting the revised Notice with a new “Last Updated” date posted at the top of the Notice. Any changes to this Notice will become effective when posted unless indicated otherwise.

Categories of Personal Information We Collect

We collect Personal Information in a variety of contexts. For example, we collect Personal Information to provide financial products and services, for our human resource, and vendor management purposes.

In the past 12 months, we may have collected and disclosed for our business purposes each of the following categories of Personal Information relating to California residents covered by this Notice:

- **Personal Identifiers:** 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:** any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.

- **Characteristics of Protected Classes:** characteristics of protected classes or groups under state or federal law, such as sex, disability, citizenship, primary language, immigration status and marital status.
- **Commercial Information:** products or services purchased, debts, assets, credit history, credit score, account information from other financial institutions, deposit account history, account and loan numbers, balances, debit or credit card number, or transaction histories.
- **Biometric Information:** fingerprints, faceprints, voiceprints and behavioral pattern.
- **Internet or Other Electronic Network Activity Information:** browsing history, search history, and information regarding a California resident's interaction with an internet website application or advertisement.
- **Geolocation Data:** device location and Internet Protocol (IP) location.
- **Audio and Visual Information:** audio, electronic, visual, or similar information that we capture through your communications with us, e.g., voice recordings or telephone conversations, emails, text/instant messaging, and security images if you visit our offices.
- **Employment Information:** Professional or employment-related information, such as work history and prior employer, information from background checks, resume, and personnel files.
- **Education Information:** education information subject to the federal Family Educational Rights and Privacy, such as student records and confirmation of graduation.
- **Inferences:** Inferences drawn from any of the Personal Information listed above to create a profile about a California resident reflecting their preferences, characteristics, psychological trends, predispositions, behavior, and attitudes, intelligence, abilities, and aptitudes.
- **Sensitive Personal Information:**
 1. Social Security, driver's license, state identification card, or passport number.
 2. 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.
 3. Precise geolocation.
 4. Racial or ethnic origin, citizenship, immigration status, religious or philosophical beliefs, or union membership.
 5. The contents of mail, email, and text messages unless the business is the intended recipient of the communication.
 6. Biometric information for the purpose of uniquely identifying an individual.
 7. Health information and sexual orientation.

Source of Personal Information

The sources from which we collect Personal Information depend on, among other things, our relationship or interaction with you. The information below lists the categories of sources from which we collect Personal Information in different contexts.

- Directly from you or an individual acting on your behalf.
- Public records, information made available by federal, state, or local government entities.
- Service providers or other third parties that provide data to support offering financial products and services or employment activities such as fraud prevention, underwriting, completing transactions, supporting our everyday operations, and workforce management. Examples include credit reporting agencies, data aggregating companies,

government agencies, other financial institutions, technology providers, title companies, employment verification agencies, etc.

- Our website or Digital Banking applications.

How We Use Sensitive Personal Information

Purposes for Collection, Use, and Disclosure	Examples
Provide and Manage Products and Services	<ul style="list-style-type: none"> ▪ Establish and process transactions for our products and services including checking accounts, loans, investment accounts, as well as additional products for businesses such as commercial financing. ▪ Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications.
Support Our Everyday Operations, including to meet risk, legal, and compliance requirements	<ul style="list-style-type: none"> ▪ Perform accounting, monitoring, and reporting. ▪ Enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence. ▪ Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims. ▪ Enable the use of service providers for business purposes. ▪ Comply with laws, regulations, policies, procedures, and contractual obligations.
Manage, Improve, and Develop Our Business	<ul style="list-style-type: none"> ▪ Market, personalize, develop, and improve our products and services. ▪ Conduct research and analysis, including to help product and services innovation. ▪ Support customer relationship management.
Support Employment, Infrastructure, and Human Resource Management	<ul style="list-style-type: none"> ▪ Provide benefits to employees and dependents, including healthcare and retirement plans. ▪ Manage pay and compensation activities. ▪ Manage and operate our facilities and infrastructure. ▪ Process employment applications.
Sensitive Personal Information as Permitted by Law	<ul style="list-style-type: none"> ▪ Perform services for our business, provide goods or services as requested by individuals, and ensure security and integrity. ▪ Short term transient use such as displaying first party, non-personalized advertising. ▪ Process and fulfil orders, maintain and service accounts, provide customer service, verify customer information, process payments, and provide financing. ▪ Activities relating to quality and safety control or product improvement.

Disclosure of Personal Information for a Business Purpose

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

- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we disclose Personal Information as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development.
- Companies or individuals that represent California residents such as an accountant, financial advisor, or person holding power of attorney on behalf of a California resident.
- Law enforcement, regulatory and other governmental agencies.
- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we provide Personal Information to support human resource activities and workforce management.
- Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties.

Retention Period

We store personal information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. However, we may need to hold Personal Data beyond these retention periods due to regulatory requirements or in response to a regulatory audit, investigation, or other legal matter.

Rights under the CCPA

If you are a California resident covered by the CCPA, you can exercise the following rights.

- **Right to Know:** You have the right, subject to certain exceptions defined in the CPPA and other applicable laws and regulations, to request that Bank of Whittier, N.A. disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
 1. The categories of personal information we collected about you.
 2. The categories of sources for the personal information we collected about you.
 3. The business or commercial purpose for collecting, selling, or sharing personal information.
 4. The categories of third parties with whom we disclose that personal information.
 5. The categories of personal information that each recipient received.
 6. The specific pieces of personal information we collected about you.

You have the right to receive this information in a format, to the extent technically feasible, that is portable, usable, and allows you to transmit the personal information to a person without impediment, where the processing is carried out by automated means.

- **Right to Request Deletion:** You have the right, subject to certain exceptions defined in the CPPA and other applicable laws and regulations, to request that the Bank of Whittier, N.A. delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request we will delete (and direct the recipients of your personal information to delete) your personal information from our records.

- **Right to Correct Your Personal Information:** You have the right, subject to certain exceptions defined in the CPPA and other applicable laws and regulations, to submit a request to correct any inaccurate personal information that we may have about you.
- **Right to Opt-out of Sharing or Selling:** You have the right to opt-out of the sharing or sale of personal information. However, since we do not share or sell information, we do not provide you with an opt-out.

How to Exercise Your Rights

If you are a California resident, you may submit a request by:

1. Contact us at (562) 945-7553 ext.120, 123, 117, or 113.
2. Email us at:
 - yarahman@bankofwhittier.com;
 - mabdelaaty@bankofwhittier.com;
 - melbeleidy@bankofwhittier.com; or
 - adang@bankofwhittier.com
3. Write us at
Bank of Whittier, N.A.
Attn: Compliance Committee
15141 E Whittier Blvd
Whittier, CA 90603
4. Visit our Whittier, CA branch.

Contact Information

If you have any questions or comments about this Notice or our privacy practices generally, we encourage you to contact us by calling (562) 945-7553.