

**LAST UPDATED: January 1, 2023**

**California Consumer Privacy Act (CCPA) Disclosure  
Rights for California Residents**

This disclosure is adopted to comply with the California Consumer Privacy Act of 2019, as amended by the California Privacy Rights Act of 2022, ("CCPA"). This disclosure is our online privacy policy required by Cal. Civ. Code 1798.130(a)(5). The CCPA and this disclosure apply solely to individuals who are California residents. This disclosure does not apply to personal information that is either exempted or not covered by the CCPA (for example, personal information collected or disclosed pursuant to the federal Gramm-Leach-Bliley Act or its implementing regulations.)

If you are a California resident you may have certain rights under the California Consumer Privacy Act (*Cal. Civ. Code §1798.100 et seq.*) regarding your personal information, including:

- The right to request the specific pieces of personal information we collected about you; the categories of personal information we collected; the categories of sources used to collect the personal information; the business or commercial purposes for collecting your personal information; and the categories of third parties with whom we share your personal information each as it pertains to our activities in the preceding twelve (12) months.
- The right to request, on legitimate grounds, deletion of your personal information that we collected;
- The right to request correction of inaccurate personal information;
- The right to have someone you authorize make a request on your behalf; and
- The right not to be discriminated against for exercising any of these rights.

We also must provide in this online disclosure certain details about our collection and handling of categories of personal information. The information that follows provides the types of personal information we may collect about California residents who are subject to the CCPA, the sources from which we collect it, and the ways in which we use and disclose it.

**Personal Information**

**Categories of Personal Information We Collect**

- **Personal identifiers, including those listed in California Civil Code Section 1798.80(e):** this includes items such as your legal name; aliases; telephone number; email address; postal address; account name; online identifier; device identifier; or IP address.
- **Characteristics of protected classifications:** this means characteristics about you which may be protected under state or federal law such as date of birth/age; gender; military or veteran status; marital status; nationality; citizenship; or information obtained about you with respect to requests for leave made pursuant to state or federal law.
- **Biometric information:** this means information related to an individual's physiological, biological, or behavioral characteristics, such as a fingerprint voice recordings or keystroke patterns and rhythms.
- **Professional or Employment information:** is information related to your professional experiences or other employment-related information such as title; salary; employment files; references.
- **Education information:** this means information related to your education history, such as details of your education and qualifications.

- **Financial details:** this includes bank account numbers; debit/credit card numbers; cardholder or account holder name and details; transaction details; and account log-in numbers.
- **Commercial Information:** this means information and records regarding transactions completed by you, such as records of personal property, products and service purchased, obtained or considered and purchasing or consuming histories or tendencies.
- **Internet or other electronic network activity information:** means information regarding your activity on the internet or another electronic network, such as your browsing history, search history, information regarding your interaction with a website, application or an online advertisement
- **Geolocation data:** means information derived from a device that can be used or is intended to be used to locate your physical location, such as an Internet Protocol (IP) location.
- **Sensory information:** means information and communications obtained from audio, electronic, visual and similar recording devices such as images obtained from video recordings or photographs.
- **Inferences:** means any derivation of information, data, assumptions, or conclusions drawn from any of the above categories used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### Categories of Sensitive Personal Information We Collect

- **Identification Numbers:** this means any information that reveals an individual's identity such as social security number, driver's license number, state identification card number, permanent resident card identification number or passport number.
- **Financial Account Credentials:** this means any information that reveals an individual's financial information such as account log-in number, financial account number (such as a loan number or deposit account number), debit card number, or credit card number in combination with any required security or access code, password, or credentials which would allow someone to gain access to the account.
- **Processed Biometric Information:** this means any Biometric information which the Bank performs an operation, set of operations or other procedure on, whether by automated means, for the purpose of uniquely identifying an individual.
- **Health Information:** this means any personal information collected and analyzed concerning an individual's health, such as information we obtain to process requests for leave for an employee's health condition.
- **Background Information:** means any information that reveals an individual's racial or ethnic origin.
- **Precise Geolocation Data:** means any data that is derived from a device and used or intended to be used to locate an individual.
- **Sensory Information:** this means audio, electronic, visual, and similar information, such as call and video recordings.

### Our Sources of Personal Information

#### Category of Sources from which we Collect Personal Information

- We obtain your personal information when you provide it to us (e.g., where you contact us via email or telephone, or by any other means)
- We collect personal information that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible)

- We receive your personal information from third parties who provide it to us (e.g., our customers; credit reference agencies; and law enforcement authorities)
- We collect or obtain personal information when you visit any of our Sites or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

## Use of Information

### Business and Commercial Purposes for Use of Personal Information

- **Marketing/Prospecting:** communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate.
- **Operation of our Sites:** operation and management of our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites.
- **IT operations:** management of our communications systems; operation of IT security; and IT security audits.
- **Health and safety:** health and safety assessments and record keeping; and compliance with related legal obligations.
- **Financial management:** sales; finance; corporate audit; and vendor management.
- **Research:** conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services.
- **Security:** physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems).
- **Investigations:** detecting, investigating, and preventing breaches of policy, and criminal offences, in accordance with applicable law.
- **Legal compliance:** compliance with our legal and regulatory obligations under applicable law.
- **Legal proceedings:** establishing, exercising, and defending legal rights.
- **Improving our products and services:** identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services.
- **Risk Management:** Audit, compliance, controls and other risk management.
- **Fraud prevention:** Detecting, preventing and investigating fraud.

## Disclosure of Information

### Categories of Third Parties to Whom Personal Information is Disclosed

- You and, where appropriate, your family, your associates, and your representatives.
- Third party service providers (such as payment services providers; shipping companies; etc.).
- Governmental, legal, regulatory, or other similar authorities and/or local government agencies, upon request or where required.
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies;

to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.

- Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).
- Accountants, auditors, financial advisors, lawyers and other outside professional advisors to CTBC Bank, subject to confidentiality.
- Data aggregation services
- Accreditation bodies
- Anti-fraud services

To request a listing of the individual third parties with whom your personal information has been disclosed, please refer to the section *“How to Submit a Request for Access to the Personal Information We Have Collected About You.”*

### **Retention**

We take reasonable steps designed to ensure that your personal information is only processed for the minimum period necessary for the purposes set out in this disclosure. The criteria for determining the duration for which we will retain your personal information are as follows:

We will retain copies of your personal information in a form that permits identification only for as long as we maintain an ongoing relationship with you (e.g., while you remain an employee, or where you are still receiving services from us); or your personal information are necessary in connection with purposes set out in this disclosure plus the duration of any applicable limitation period under applicable law; and where required. In addition, if any relevant legal claims are anticipated/brought, we may continue to process your personal information for such additional periods as are necessary in connection with that claim.

During the periods noted above we will restrict our processing of your personal information to storage of, and maintaining the security of, that information except to the extent that that information needs to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods above, each to the extent applicable or permitted by applicable law, have concluded, we will 1) permanently delete or destroy the relevant personal information, or 2) archive your personal information so that it is beyond use; or 3) anonymize the relevant personal information.

### **No Sale of Personal Information**

We **do not** sell your personal information to third parties. If you obtain banking products or services from us, we may need to provide certain of your personal information to outside parties who we use to provide those products and services to you. For example, if you obtain a mortgage loan from us, we will need to provide information about your loan to the title insurance company and the escrow company that is involved in closing your loan. If you have a deposit account with us, we will need to provide your personal information to the processing company that maintains your account records and processes deposits and withdrawals, checks, ACHs, wires and other transactions.

## Right to Access the Personal Information We Have Collected About You

You have the right to access the personal information we have collected about you, with certain limited exceptions. Some of those exceptions are the following:

- ***You must be a resident of California.*** The rights discussed in this Online Privacy Policy are rights granted under the California Consumer Privacy Act to California residents. If you are not a California resident, this policy does not apply to you.
- ***You must provide sufficient information to us to verify your identity.*** Before disclosing any information about what personal information we may have collected about an individual, we need to be able to verify that the person making the request is indeed that individual. We also need to verify that you are a California resident. The methods we use to verify your identity can vary depending upon whether you have an existing account or previously applied for an account, whether your accounts include deposit accounts, loan accounts or other types of accounts, and the types of transactions you have initiated through us in the past.
- ***We are not required to disclose information about accounts or transactions that are used for personal, family or household purposes.*** The federal Gramm Leach Bliley Act gives consumers certain privacy rights in connection with their accounts and transactions used for personal, family or household purposes. A copy of our Consumer Privacy Notice for accounts and transactions used for personal, family or household purposes can be found [here](#). The California Consumer Privacy Act, and the rights discussed in this Online Privacy Policy, do not apply to those accounts or transactions.
- ***We are not permitted to disclose information collected in connection with our internal bank security procedures or federal reporting responsibilities.*** As a federally-regulated bank, we are required to maintain adequate security measures to protect you our customer and to protect our bank, and we need to collect certain information about our customers and their accounts and transactions in connection with those security measures. Disclosing that information to anyone could compromise our security measures. We are also required to collect and report certain information to the government about accounts and transactions, and we are not permitted under federal law to disclose the information we collect or report in connection with these responsibilities.
- ***There is a 12-month limit on your right to access the personal information we have collected.*** We are required to provide information about your personal information that we have collected in the past 12 months.

## How to Submit a Request for Access to the Personal Information We Have Collected About You

You can request access to the personal information we have collected about you by submitting a request:

- Submitting an email request to [ccpa@ctbcbankusa.com](mailto:ccpa@ctbcbankusa.com);
- In person, complete the [Request for Information](#) form and drop it off at any of our California branch locations; or
- By telephone, by calling 1-888-889-8000 and providing the information required.

You will need to provide us with your name, your residence address in California, a method of contacting you by phone or email, and a brief description of the products or services you have used that lead you to believe we may have collected your personal information. For example, if you applied for a

loan or deposit product but then changed your mind or were denied, that information would be helpful to us in identifying any personal information we may have collected.

### **Right to Delete/Correct Your Personal Information**

You have the right to request that we delete/correct any personal information about you that we have collected from you. Our obligation to delete/correct your personal information is subject to certain conditions and exceptions. For example, we need to be able to verify your identify, as explained above, and your residence address in California.

Also, we are not required to comply with your request to delete your personal information if it is necessary for us or our service provider to maintain your personal information in order to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to California Penal Code Section 1546.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

If we are able to verify your identify, and to the extent the exceptions do not apply, then we will delete/correct your personal information and direct any service providers to delete/correct your personal information from their records.

### **Right to Equal Service**

We cannot and will not discriminate against you because you exercised any of your rights under the California Consumer Privacy Act. These means, for example, that we will not:

- Deny you any goods or services because you exercised these rights
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties, because you exercised these rights
- Provide a different level or quality of goods or services to you because you exercised these rights

- Suggest that you receive a higher price or rate for goods or services or a lower level or quality of goods or services because you exercised these rights

We do need to collect certain personal information in order to provide banking services to you, so if you do not want to provide that necessary personal information, we will not be able to provide you with those banking services.

### **How to Contact Us**

If you have any further questions about your rights under California Consumer Privacy Act, please contact us by email at [ccpa@ctbcbankusa.com](mailto:ccpa@ctbcbankusa.com) or by phone at +1-888-889-8000.

### **Changes to this Policy**

We may change this policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised disclosure on our CCPA web site with a new “Last Updated” date. Any changes to this policy will become effective when posted unless indicated otherwise.