California Consumer Privacy Act – Notice at Collection

Introduction

Under the California Consumer Privacy Act of 2018 (CCPA), River City Bank (the “Bank”) is required to inform California residents who are employees, job applicants, contractors, or any other consumer not exempted from the CCPA about the categories of personal information the Bank collects about you and the purposes for which the collected information will be used. This notice contains the disclosures required to comply with the CCPA.

View our [California Consumer Privacy Act Policy](https://rivercitybank.com/ccpa-privacy-policy/).

Collection, Use and Disclosure of Personal Information

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

* 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 Civ. Code § 1798.80.

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, date of birth, 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;

* Protected Classification Characteristics under California or federal law, such as sex and marital status;
* Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
* Biometric information such as fingerprints;
* Internet or other electronic network activity information, such as browsing history, search history, and information regarding a California resident’s interaction with an internet website application, or advertisement;
* Geolocation data, such as device location and Internet Protocol (IP) location;
* Sensory information, such as audio, electronic, visual, or similar information such as call recordings;
* Professional or employment-related information, such as work history and prior employer;
* Non-public Education information, directly related to a student, and as provided by the student.
* Inferences information 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. For example, if an individual clicks on a link to learn more about a HELOC, we may infer that they are a homeowner and/or that they are looking for lending options.;
* The following categories of Sensitive Personal Information:

Personal Information that may reveal:

* A California resident’s Social Security, driver’s license, state identification card, or passport number;
* A California resident’s 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;
* A California resident’s precise geolocation;
* A California resident’s racial or ethnic origin, religious or philosophical beliefs, or union membership;
* The contents of a California resident’s mail, email, and text messages unless the business is the intended recipient of the communication;

The processing of biometric information for the purpose of uniquely identifying a California resident.

In addition to collecting Personal Information ourselves, we coordinate with third parties to collect Personal Information on our behalf for one or more of the business practices described below:

* Delivering advertising and marketing, including on non-affiliated persons’ or entities’ sites and mobile apps;
* Facilitating events and event management, including virtual and/or in-person events (e.g., hotels, restaurants, virtual platforms, audio/visual capabilities, food/beverage, transportation services, etc.); and
* Referral sources, whether for purposes of identifying candidates for employment, identifying new client opportunities, or recommending vendors or contractors.

The categories of sources from which we collect Personal Information are:

* You (or your designated representative) when applying for, or opening, a deposit account, loan, or any other bank services;
* From your devices, such as when you visit our websites, online and mobile applications
* Service Providers, Consumer Data Resellers, Credit Reporting Agencies and other similar persons or entities;
* Third-party verification services;
* Internet search engines, including Website/Mobile App Activity/Social Media;
* Public Record Sources (Federal, State or Local Government Sources) and Other publicly-available sources;
* Job application with us;
* Information from Client-Directed persons or entities or Institutions representing a Client/Prospect; and
* Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member).

With respect to each category of Personal Information that we disclosed for a business purpose in the past 12 months, the categories of persons or entities to whom we disclosed that Personal Information are:

* Service Providers and Contractors who provide services such as data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing, marketing research activities, credit financing, event management, and real estate management;
* Other Service Providers and Contractors who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, real estate expertise, appraisal expertise, notaries, and auditors;
* Other Service Providers and Contractors who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, vehicle loan processes and aggregators (at the direction of the Other Services Providers that may perform audit review for risk analysis and mitigation;
* Government Agencies as required by laws and regulations;  
  Other persons or entities with which you may use or direct us to intentionally interact or to which you may use or direct us to intentionally disclose your Personal Information.

We do not disclose Personal Information to any other categories of third parties.

We collect, use and disclose for our business purposes Personal Information, including Sensitive Personal Information, relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business or commercial purposes, including the following:

* Performing services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, facilitating event management and execution, managing our real estate portfolio, or providing similar services;
* Helping to ensure security and integrity to the extent the use of Personal Information is reasonably necessary and proportionate for these purposes;
* Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a current interaction with us, where the information is not disclosed to a third party and is not used to build a profile or otherwise alter the California resident’s experience outside the current interaction with us;
* Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
* Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance that service;
* Debugging to identify and repair errors that impair existing intended functionality;
* Undertaking internal research for technological development and demonstration;
* Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

How We Use Sensitive Personal Information

We only use or disclose Sensitive Personal Information for the following purposes consistent with CCPA Regulations:

* To perform the services or provide the goods reasonably expected by an average California resident who requests those goods or services. For example, a California resident’s precise geolocation may be used by a mobile application that is providing them with directions on how to get to a specific location.
* To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that the use of a California resident’s Personal Information is reasonably necessary and proportionate for this purpose. For example, we may disclose a California resident’s account information to a data security company that is hired to investigate and remediate a data incident that involved that individual’s account.
* To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of a California resident’s Personal Information is reasonably necessary and proportionate for this purpose. For example, we may use information about a California resident’s ethnicity and/or the contents of email messages to investigate claims of racial discrimination.
* To ensure the physical safety of natural persons, provided that the use of a California resident’s Personal Information is reasonably necessary and proportionate for this purpose. For example, we may disclose a California resident’s account information to law enforcement, when required by law, to investigate financial elder abuse.
* For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a California resident’s current interaction with us.
* To perform services such as maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying a California resident’s information, processing payments, providing financing, analytic services, or storage.
* To verify or maintain the quality or safety of a service or device that is owned, manufactured by, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

River City Bank will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice, where required by law. River City Bank does not sell or share your personal information, as those terms are defined by the CCPA. Personal information is retained by us as determined by relevant law and internal record retention policies.

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