California Consumer Privacy Act Notice

First Savings Bank California Consumer Privacy Act Notice

This Privacy Act Notice for California Residents supplements the information contained in the Privacy Policy of First Savings Bank and its subsidiaries (collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws.  Any terms defined in the CCPA have the same meaning when used in this notice.

The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”). For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our [Privacy Notice](file:////wp-content/uploads/2018/10/privacy-disclosure-2018.pdf).

We also must provide in this Notice certain details about our collection and handling of categories of personal information. The information that follows shows 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 Collected and Disclosed**

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

* Identifiers, such as name and government-issued identifier (e.g., Social Security number);
* Personal information, as defined in the California safeguards law, such as contact information and financial information;
* Characteristics of protected classifications under California or federal law, such as sex and marital status;
* Commercial information, such as transaction information and purchase history;
* Internet or network activity information, such as browsing history and interactions with our website;
* Geolocation data, such as device location and Internet Protocol (IP) location;
* Audio, electronic, visual and similar information, such as call recordings;
* Professional or employment-related information, such as work history and prior employer; and
* Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual’s preferences and characteristics.

The categories of sources from whom we collected this Personal Information are:

* Directly from a California resident or the individual’s representatives
* Service Providers, Consumer Data Resellers and other third parties
* Public Record Sources (Federal, State or Local Government Sources)
* Information from our Affiliates
* Website/Mobile App Activity/Social Media
* Information from Client Directed Third Parties or Institutions representing a Client/Prospect
* Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member)

The categories of third parties to whom we disclosed Personal Information for our business purposes described in this privacy disclosure are:

* Affiliates of First Savings Bank
* Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing and marketing research activities
* Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the Bank and its financial services and products to customers and other prospective buyers
* Other Third Parties 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 customer)
* Government Agencies as required by laws and regulations

**Use of Personal Information**

In the past 12 months, we have used Personal Information relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, 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, or providing similar services.
* Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
* Short-term, transient use where the information is not disclosed to a third party and is not used to build a profile or otherwise alter an individual consumer’s experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
* Auditing related to a current interaction and concurrent transactions, including, but not limited 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 the service controlled by the business.
* 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)

**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 (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

**Sale of Personal Information**

In the past 12 months, we have not “sold” Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Disclosure, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

**Your Rights Under the CCPA**

If you are a California resident you may have certain rights under the CCPA 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 deletion of your personal information that we collected unless there is an exception recognized under the CCPA;
* 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.

**Deletion Request Rights**

You have the right to request that we delete any of your personal information that 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 retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. 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 the information’s deletion may likely render impossible or seriously impair the research’s achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**Exercising Access or Deletion Rights**

To exercise the Access or Deletion rights described above, please submit a verifiable consumer request to us by either:

* Calling us at 1-877-418-2669.
* Completing an online [Personal Information Request Form](file:////privacy-notice/california-consumer-privacy-act-notice/personal-information-request-form/)

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

* Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
* Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.  Making a verifiable consumer request does not require you to create an account with us.  We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you  
with an explanation for the delay.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**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 goods or services.
* Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
* Provide you a different level or quality of goods or services.
* Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**Changes to This California Consumer Privacy Act Disclosure**

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

**Questions or Concerns**

You may contact us with questions or concerns about this Disclosure and our practices by Calling 1-877-418-2669 or go to [Contact Us](file:////contact-us/).