

## Notice and Policy for the California Consumer Privacy Act

Southwestern National Bank is committed to protecting the privacy and security of your personal information. This privacy policy describes the types of information we may collect from you or otherwise receive about you and our practices for collecting, or disclosing that information. Southwestern National Bank does not sell any personal information we collect from you.

### Right to Know About Personal Information Collected, or Disclosed

You have the right to know what personal information we collect, use, and disclose. If you wish to submit a verifiable consumer request for the personal information we collect, use, or disclose, or wish to exercise your rights under California law, you may submit your request through one of the following ways:

- Call the toll free number: (877) 272-5088 and ask for the Compliance Officer
- Submit a "Right To Access, Know, or Delete" request form by mail to:  
Southwestern National Bank  
Compliance Officer  
6901 Corporate Drive  
Houston, TX 77036

California law requires us to verify your identity before we can process your request. In order to verify your identity we may need to request specific information from you such as your account number, the date or amount of your last deposit or withdrawal that you made or other information and match that information with the information we already maintain on you. This helps us confirm your identity and ensure you can exercise your right to access the information.

We will acknowledge your request within 10 business days, and will provide the requested information within 45 days. If we are not able to respond within 45 days, we will inform you and respond within an additional 45 days. You may request this information up to two times per 12 month period. We reserve the right to verify the legitimacy of all requests, using any information you have given us, or any transactional information we have. We are prevented from providing the following:

- Your social security number;
- Driver's license or other government-issued identification number;
- Financial account number;
- Any health insurance or medical identification number (if we have it);
- Account passwords or security questions and answers

### Collection of Personal Information

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

Below is a list of categories of personal information we have collected about consumers in the preceding 12 months. For each category identified below, we have also provided (i) the categories of sources from which we collected the personal information, (ii) the business or commercial purpose for collecting the information and (iii) the categories of third parties with whom we share the personal information:

- Categories of Personal Information We Collect
  - Identifiers such as a real name, alias, postal address, online identifiers, email address or unique personal identifier or other similar identifiers.
  - Any information that identifies, relates to, describes, or is capable of being associated with a particular individual, including, but not limited to, name, signature, Taxpayer I.D. such as a social security number or Employer Identification Number, physical characteristics or description, birthdate, address, telephone number, passport number, driver's license or state identification card number, employer, bank account number, credit card number, e-mail, or any other financial information, such as tax returns.
  - Characteristics of protected classification under California or federal law such as race or gender.
  - Commercial information, including records of personal property, or products or services purchased, obtained, or considered.

- Internet or other electronic network activity information, such as account numbers, Internet Protocol (IP) address.
  - Geolocation, including electronic network activity information pulled from a device which can be used to identify the precise location of an individual.
  - Professional or employment-related information.
  - Inferences drawn from any of the above.
- Categories of Sources from Which We Collect Personal Information
    - Directly from you; such as information you provide on our forms, surveys, loan applications, including applications for employment, or similar online fields or forms or items we collect indirectly from others, such as credit reporting agencies, title companies, appraisers, etc.
    - Directly or indirectly from you when you establish a deposit or loan account.
    - Indirectly from you when you access our products or services such as debit card, our online and mobile banking applications using your personal computer, cell phone, or other electronic or mobile device.
    - Security cameras located at our banking centers
    - Indirectly from you when you use our products or services to conduct banking transactions.
  - Our Business Purpose for Collecting Personal Information
    - To establish a relationship with us; To service the products and services you have with us; To consider your job application for hiring; and with consultants and auditing firms, with information shared for institution risk analysis and mitigation or comply with a legal or regulatory obligation.
    - To support internal operations of our debit card product, website, mobile app
    - To determine country and time zone to support the internal operations of our website or offer products or services to you, and not for any other purpose.
    - To protect, detect, investigate, report and seek to prevent financial crime
    - To conduct research or to assess job qualifications if you submitted an application for employment;
    - To open an account or to make a loan to you.
    - To offer products and services to you, conduct investigations, or comply with our regulatory obligations.
  - Categories of Third Parties with Whom We Disclosed the Personal Information
    - Service providers, sub-contractors, credit reporting agencies, government entities, or companies you authorize us to share your data with. This may include a sub-contractor who inspects real estate, or a company that processes our payroll if you are an employee of Southwestern National Bank.
    - Government agencies to comply with reporting requirements governed by the Home Mortgage Disclosure Act.
    - Service providers, sub-contractors, who inspect real estate such as an appraisal company or real estate inspector
    - Service providers, sub-contractors or companies you authorize us to share your data with such as a vendor who we contract with to provide services via our mobile app or website.
    - Service providers, sub-contractors, government entities, or companies you authorize us to share your data with such as a vendor who we contract with to provide online or mobile banking services to you
    - Federal, State or local governmental agencies
    - Service providers or other third parties to comply with law and regulations. We may also share your personal information with credit reporting agencies or a company that processes employment applications for Southwestern National Bank
    - Service providers or other third parties to comply with law and regulations. We may also share your personal information with a regulator, governmental agency or otherwise.

### **Disclosure or Sale of Personal Information**

We do not sell any personal information about consumers.

We have disclosed personal information about consumers to third parties for a business purpose in the preceding 12 months. Below is a list of categories we have disclosed to third parties in the preceding 12 months.

- Categories of Personal Information That We Disclose to Third Parties for a Business Purpose
  - Identifiers such as a real name, alias, postal address, online identifiers, email address or unique personal identifier or other similar identifiers.
  - Any information that identifies, relates to, describes, or is capable of being associated with a particular individual, including, but not limited to, name, signature, Taxpayer I.D. such as a social security number or Employer Identification Number, physical characteristics or description, birthdate, address, telephone number, passport number, driver's license or state identification card number, employer, bank account number, credit card number, e-mail, or any other financial information, such as tax returns
  - Characteristics of protected classification under California or federal law such as race or gender.
  - Commercial information, including records of personal property, or products or services purchased, obtained, or considered.
  - Internet or other electronic network activity information, such as account numbers, Internet Protocol (IP) address.
  - Geolocation, including electronic network activity information pulled from a device which can be used to identify the precise location of an individual.
  - Visual or similar information
  - Professional or employment-related information
  - Inferences drawn from any of the above.

### **Right to Request Deletion of Personal Information**

Federal laws may govern our retention of your information; however, anything we are not required to maintain under those guidelines may be deleted. Exceptions to our deletion responsibilities include information necessary to:

- Complete the transaction for which the information is collected;
- Provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you;
- Perform a contract between us and you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or to prosecute those responsible for that activity;
- Debug to identify and repair errors;
- 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 information internally in a lawful manner that is compatible with the context in which you provided the information.

To request the deletion of any personal information about you which we have collected or maintained, you may submit a verifiable consumer request to us by following the instructions below:

- Call the toll free number: (877) 272-5088 and ask for the Compliance Officer
- Submit a "Right To Access, Know, or Delete" request form by mail to:  
Southwestern National Bank  
Compliance Officer  
6901 Corporate Drive  
Houston, TX 77036

California law requires us to verify your identity before we can process your request. In order to verify your identity we may need to request specific information from you such as your account number, the date or amount of your last deposit or withdrawal that you made or other information and match that information with the information we already maintain on you. This helps us confirm your identity and ensure you can exercise your right to access the information.

### **Right to Opt-Out of the Sale of Personal Information**

Southwestern National Bank does not sell any personal information we collect from you therefore there is no need to Opt-Out. *(If we change our policy or practice, for example, adding a category of information that we will disclose or sell to a third party, we will notify existing customers and give them an appropriate time period to opt out of the disclosure)*

**Right to Non-Discrimination for the Exercise of Your Privacy Rights**

You have a right not to receive discriminatory treatment by Southwestern National Bank for the exercise of the privacy rights conferred by the California Consumer Privacy Act (California Civil Code § 1798.100 et seq.). To learn more about your California privacy rights, visit: <https://www.caprivacy.org/>.

**Authorized Agent**

You may designate an authorized agent to make a request under the California Consumer Privacy Act on your behalf. If you wish to authorize another person to act as authorized agent on your behalf, you must provide the authorized agent permission to do so; in which case, we will request specific information to help us identify their identity. We may also require you to verify your own identity directly with us. We reserve the right to deny a request from an agent that does not submit proof they have been authorized by you to act on their behalf.

Our Privacy Policy was last updated on January 1, 2020.



## Right To Access, Know, or Delete

To comply with our regulatory obligation under the California Consumer Privacy Act, you have the right to know what personal information we collect, use, disclose and sell. If you wish to submit a verifiable consumer request for the personal information we collect, use, disclose or sell, or wish to exercise your rights under California law, please complete the following information as accurately as possible. Any information provided here or in the context of completing your request will only be used to satisfy your request:

I want to: ☐ Access My Data ☐ Delete My Data\* ☐ Opt Out ☐ Other (please indicate below)

\*Federal laws may govern our retention of your information; however, anything we are not required to maintain under those guidelines may be deleted.

_____ Name		Current Customer Yes <input type="checkbox"/> No <input type="checkbox"/>	
_____ Business Name		_____ Daytime Phone	
_____ Address	_____ City	_____ State	_____ Zip
_____ Email Address			
_____ Authorized Signer Signature		_____ Date	

Preferred Method of Contact

Email ☐ Mail ☐ Phone ☐

Request:

I consent to be contacted by Southwestern National Bank. By signing and sending in this "Right To Know Request," you are authorizing Southwestern National Bank to contact you using the address, telephone number or email address you have provided. Your authorization means that we can call you even if you previously registered a federal "do not call" preference.