



## **Studio Bank Privacy Practices**

Federal law gives consumers the right to limit some of how your personal information is shared.  
See how Studio Bank protects your personal data in our Privacy Notices.

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# FACTS

## WHAT DOES STUDIO BANK DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and payment history
- Transaction history and credit history

When you are *no longer* our customer, we continue to share your information as described in this notice.

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Studio Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Studio Bank share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share.
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share.
<b>For our affiliates to market to you</b>	No	We don't share.
<b>For nonaffiliates to market to you</b>	No	We don't share.

### Questions?

Call 615.338.9998 or visit [www.studiobank.com](http://www.studiobank.com)

What we do	
<b>How does Studio Bank protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Studio Bank collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account or apply for a loan</li> <li>■ Deposit money or pay your bills</li> </ul> <p>We also collect your personal information from others such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Studio Bank has no affiliates</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Studio Bank does not share with nonaffiliates so they can market to you</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Studio Bank doesn't jointly market</i></li> </ul>

## Mobile Banking Disclosure

In addition to other uses described in our Privacy Policy, we disclose the following ways we (and our third-party service providers) may use features of your mobile device when you use our Mobile Application ("App") or a mobile web browser:

- We use your mobile device camera to capture images of checks you deposit through our mobile remote deposit service, and we may access your mobile device camera if you add images to secure messaging;
- We may use your location when you use the App or your mobile web browser to locate one of our branch locations or ATMs;
- We may collect location data, even when the app is closed or not in use, if you have enabled certain fraud detection services, such as with debit card controls related to "My Location";
- We may access files or media on your mobile device when you attach files, pictures or other media to messages through the App or our website (such as, for example, the uploading of ACH or wire files to execute transactions) accessed through your mobile web browser;
- If person-to-person payments are allowed through the App or your mobile device, we may access your contacts to help confirm the identity of the intended recipient when you initiate a payment to someone;
- We may access your mobile device's microphone or audio capture service if you send us an audio message through the App or our website using your mobile web browser;
- We may collect information through the App or your mobile web browser regarding identifiers such as your User ID and Device ID; your device's IP address for purposes of security and fraud prevention; your usage of or interaction with the App or our mobile website for the purposes of improving the user experience; and diagnostic data, including but not limited to crash and performance data, for the purposes of improving the user experience and reducing usage problems or inefficiencies.

In each case, these features are used by the Bank to provide services that you request. If you have concerns or want to revoke our access to any of these features, you should cease using your mobile device for the services described above. You may also call us at 615-338-9998 for an explanation of how to prevent such uses.

# California Consumer Privacy Act

This **Privacy Notice for California Residents** supplements the information contained in our Privacy Policy and applies solely to all 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 any terms defined in the CCPA have the same meaning when used in this notice.

## Information We Collect

Studio Bank collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**").

- In particular, our website may collect personal information from the following categories from its consumers: Identifiers (e.g. name, mailing address, email address, phone number)
- Characteristics of protected classifications (e.g. gender, age)
- Commercial information (e.g. marketing collateral requested, webinar registrations)
- Internet or other electronic network activity (e.g. browse or search history)
- Geolocation data (e.g. latitude or longitude)
- Inferences drawn from any of the above (e.g. preferences or characteristics)

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

## We Obtain the Categories of Personal Information Listed Above from the Following Categories of Sources:

- Directly from you. For example, from forms you complete on our website.
- Indirectly from you. For example, from observing your actions on our website.

## Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that

personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information, in accordance with CCPA.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- We 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.

### **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.

For our marketing purposes – to offer our products and services to you.

### **Sales of Personal Information**

In the preceding twelve (12) months, we have not sold personal information.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights. You have the following rights under the CCPA:

- Right to request the Bank disclose Personal Information, or Categories of Personal Information, it collects, uses, discloses, and sells (Access to Specific Information and Data Portability Rights)
- Right to request the Bank delete Personal Information we have collected from you (Deletion Request Rights)
- Right to request the Bank opt you out of the sale of your Personal Information (Personal Information Sales Opt-out and Opt-in Rights)

## **Access to Specific Information and Data Portability Rights**

You have the right to request that we 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, as requested and verified:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

## **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 provider(s) to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **Personal Information Sales Opt-Out and Opt-In Rights**

- If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following webpage and sending us a message.
- Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by visiting our website and sending us a message. We will only use personal information provided in an opt-out request to review and comply with the request.

## **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by mailing us at:

Studio Bank

Attn: Deposit Operations Manager

124 12<sup>th</sup> Avenue South, Suite 400

Nashville, TN 37203

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.



The following is our process for **Verifying a Request**:

**Request to Know Categories of Personal Information:** We will verify your identity to a "reasonable degree of certainty" by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities.

**Request to Know Specific Pieces of Personal Information:** We will verify your identity to a "reasonably high degree of certainty" by verifying at least three pieces of Personal Information previously provided to us and which we have determined to be reliable the purpose of verifying identities. In addition, you will be required to submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

**Request to Delete:** We will verify your identity to a "reasonably high degree of certainty" by verifying at least three pieces of Personal Information previously provided to us and which we have determined to be reliable for the purpose of verifying identities. In addition, you will be required to submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

If we are unable to verify your identity to the applicable standard, we will treat your request to delete as a request to opt-out of the sale of the personal information that you provided as part of processing the request to delete. See the following section for a description of the right to opt-out of the sale of personal information.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We will endeavor to respond within 15 days from the date that you submit the opt-out of sale request. The CCPA does not require that we verify the identity of individuals who submit requests to opt-out of sales. However, we may deny the request if we have a good-faith, reasonable, and documented belief that the request is fraudulent. If we deny the request on this basis, we will notify the requesting party and provide an explanation why we believe the request is fraudulent.

### **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.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us an electronic message through our website or write us at our address listed on our webpage.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and uses your information described below [and in the Privacy Policy], your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to write us at our address:

Studio Bank  
Attn: Deposit Operations Manager  
124 12<sup>th</sup> Avenue South, Suite 400  
Nashville, TN 37203

