

California Consumer Privacy Act Notice At Collection

In this California Consumer Privacy Act Notice at Collection ("NAC"), Bank of the Orient ("**Bank of the Orient**", "Bank" or "we", "us" and "our") disclose information about our data processing practices relating to consumers (collectively "you", "your" and "yours" as well as "consumer") as required by the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 (CPRA).

Information We Collect

We have set out below the categories of personal information and categories of sensitive personal information we may collect about you when you interact with us.

Categories of Personal Information we collect include the following:

- **Identifiers**, which means information used to identify an individual, such as your real name, an alias, postal address, a unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- **Related Personal Information**, which means information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including the categories of personal information described in California Civil Code Section 1798.80(e), including, but not limited to, your name, a signature, physical characteristics or descriptions, telephone numbers, insurance policy numbers, education information, employment and employment history, bank account numbers, credit card number, debit card number, and other financial information associated with individuals.
- **Protected Classifications** which is information related to protected classifications under California or federal law, such as (but not limited to) your race, religion, national origin, sex (including pregnancy, childbirth, and related medical conditions), disability, leave, age, citizenship status, breastfeeding, marital status, gender identity, gender expression, sexual orientation, medical condition including AIDS/HIV, political activities and affiliations, military and veteran status, and status as a victim of domestic violence, assault, or stalking.
- **Commercial Information**, which is information related to your purchasing, spending or commercial and other business activities, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Electronic Activity Information**, which is information related to your activity on the Internet or other electronic or digital networks including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.
- **Audio/Visual Information**, means audio, electronic, visual, thermal, olfactory, or similar information, such as video recordings we obtain from security cameras in our branches.
- **Employment Information**, which is professional or employment related information about you, such as your employment history or employment status.
- **Education Information**, which means information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99).
- **Inferences**, which means inferences the Bank makes about consumers that are drawn from any of the categories of personal information we collect to create a profile about an individual that might reflect an individual's preferences, characteristics, behaviors or attitudes.
- **Geolocation Information**, which means information or data related to your geographic location.
- **Biometric Information**, which means information related to an individual's physiological, biological, or behavioral characteristics, such as keystroke patterns or rhythms, a fingerprint, or voice recordings, from which an identifier template, such as a fingerprint template or a voiceprint, can be extracted.

Categories of Sensitive Personal Information we collect include the following:

- **Identification Numbers**, which means information that reveals an individual's social security number, driver's license number, passport number or state identification card number.
- **Account Credentials** is any information that reveals an individual's account log-in information, financial account, debit card or credit card number in combination with any required security or access code, password or credentials allowing accessing to an account.
- **Precise Geolocation**, which means any Geolocation Information that is derived from a device and that is used or intended to be used to locate an individual within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet.
- **Background Information**, which is information that reveals an individual's racial or ethnic origin, citizenship or immigration status.

- **Processed Biometric Information**, which is any Biometric Information which the Bank performs an operation, set of operations or other procedure on, whether or not by automated means, for the purpose of uniquely identifying an individual.
- **Health Information** is any personal information collected and analyzed concerning an individual's health.
- **Sexual Identity Information**, which is information concerning a consumer's sex life or sexual orientation
- **Personal Messages** are the contents of a consumer's mail, email, or text messages unless the Bank is the intended recipient of the communication.

Business or Commercial Purpose For Collecting Personal Information

We collect the categories of personal information and categories of sensitive personal information for the following business or commercial purposes:

- **Operational** - Providing services for our customers and others, including but not limited to, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, providing banking advice and other services to our customers, , responding to inquiries from government agencies (when required by law), managing our business operations and administering our client relationships
- **Commercial** - Activities to advance our own commercial or economic interests or that enable or effect transactions, such as providing relevant marketing to you (e.g., information about events or services that may be of interest) except we will not use the categories of sensitive personal information for marketing purposes
- **Compliance** - As necessary to address, verify and maintain compliance with our legal and regulatory obligations or our policies and procedures, including but not limited to, checking identity of new customers, prevention of fraud and anti-money laundering requirements, or responding to legal processes and/or regulatory requests for information when required by law
- **Employment** - As necessary or required in connection with managing our employment relationships (such as to administer sick leave, sick pay, accidents at work, other employment related claims, accommodating disability within the workplace, promotions and performance and performance evaluations and maternity leave, among other things) or to otherwise verify and maintain compliance with our obligations as an employer. This includes but is not limited to using personal information to consider individuals for employment and contractor opportunities, manage on-boarding procedures, administering and providing compensation, benefits, and other work-related allowances, providing employment references, administering ethics and compliance training, facilitating and providing services for the re-location and movement of employees and their families locally and internationally and communicating with employees and their designated contacts in the event of an emergency.
- **Security** - To protect against malicious, deceptive, fraudulent or illegal activity, detect security incidents, or hold the perpetrators of such activity responsible, such as monitoring use of the bank's technology systems, databases, and property (consistent with applicable law), conducting investigations or security screenings to the extent required or permitted by law, or managing our information technology systems.
- **Auditing** - Auditing compliance with our policies and procedures or applicable legal and regulatory standards such as our corporate financial responsibilities for accounting, and applicable tax requirements.
- **Debugging** - Debugging to identify and repair errors that impair existing or the intended functionality of products or services, such as to make our website more intuitive and easier to use.

No Sale or Sharing of Personal Information

We do not sell or share any of the personal information we collect.

Length of Time We Will Retain Your Personal Information

We will retain the categories of personal information and categories of sensitive personal information we collect to carry out our activities and as otherwise required or permitted by applicable law. We will keep this information no longer than necessary to fulfill the purposes described in this notice as long as you are a customer, or an employee. We will destroy this information after we no longer need it according to specific retention periods. However, we may need to hold this information beyond the retention period due to regulatory and legal requirements or in response to a regulatory audit, investigation, or other legal matter.

If you would like more information about the CCPA or your rights under the CCPA, please see our CCPA Privacy Policy by clicking this link:

[https://www.bankorient.com/Portals/BankOrient/PDF/California-Consumer-Privacy-Act-\(CCPA\)-Policy-Jan-2024.pdf](https://www.bankorient.com/Portals/BankOrient/PDF/California-Consumer-Privacy-Act-(CCPA)-Policy-Jan-2024.pdf).