

California Consumer Privacy Act (CCPA) Privacy Policy

In this California Consumer Privacy Act Privacy Policy ("CCPA Privacy Policy"), 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), including its implementing regulations and how the law may be amended from time to time. This CCPA Privacy Policy is effective January 1, 2024.

Who and what information is subject to this CCPA Privacy Policy?

Residents of the State of California are protected as "consumers" by the CCPA with respect to their personal information. However, this CCPA Privacy Policy does not apply to personal information that is exempt or otherwise not covered by the CCPA.

Right to Know About Personal Information

You have the right to know what personal information we collect about you, including the categories of personal information we collect, the categories of sources from which the personal information is collected, our business or commercial purpose for collecting, selling, or sharing personal information (as may be applicable), the categories of third parties to whom we disclose personal information to, and the specific pieces of personal information we have collected about you ("Right to Know" or "RTK"). To submit a request to exercise your RTK, you may call us at 1-800-881-2686 or submit an email request to **Bank of the Orient** at info@bankorient.com with the phrase "California Request to Know" included in the subject line. We will ask that you provide us with certain information in order to verify your identity, including but not limited to a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Information We Collect

We have set out below the categories of personal information and categories of sensitive personal information we have collected about California residents in the preceding 12 months.

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, genetic information, ancestry, 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.

Sources From Which We Collect Personal Information

We may collect the categories of personal information and categories of sensitive personal information from the following sources:

- Directly from you when you provide the information directly to the Bank, or third parties, such as when you apply for a financial product or service, become our customer or are acting as a job applicant or employee of the Bank.
- Third parties who have been duly authorized by you to disclose data on your behalf, such as employers, agents, professional advisors, or others.
- Company-maintained databases.
- Publicly available databases.
- Other private or proprietary third-party databases we are contractually and legally permitted to access.
- Our affiliates, counterparties to transactions or disputes with consumers, employers, agents, or professional advisers authorized to disclose data on your behalf.
- State and federal government agencies.
- Credit reporting agencies.
- Our service providers.
- Social networking platforms.
- Data brokers.
- Persons and entities with whom you perform transactions with.
- Your previous employers and educational institutions.

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 ourselves, 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.

Disclosure of Personal Information

We have disclosed personal information about consumers to third parties for a business or commercial purpose in the preceding 12 months. Below is a list of the categories of personal information and sensitive personal information we have disclosed for a business purpose. For each category we have also identified our business or commercial purpose for disclosing the information and the categories of third parties to whom the personal information was disclosed.

Category of Personal Information Disclosed	Our Business or Commercial Purpose for Disclosing the Personal Information	Categories of Third Parties with Whom the Personal Information was Disclosed
Identifiers	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information</p>

		<p>technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Related Personal Information	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Protected Classifications	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Commercial Information	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p>

		<p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Electronic Activity Information	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Audio/Visual Information	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Employment Information	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p>

		<p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Education Information	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Inferences	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
Geolocation Information	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p>

		Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.
Biometric Information	Operational, Commercial, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
Identification Numbers	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>.Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Precise Geolocation	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Other Third Parties who enable customers to conduct transactions with us online and via mobile devices, and which support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services to us 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.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

Background Information	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p> <p>Credit Reporting Agencies</p>
Processed Biometric Information	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
Genetic Data	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
Health Information	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
Sexual Identity Information	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
Personal Messages	Operational, Employment, Compliance, Security, Auditing, Debugging	<p>Law enforcement, regulatory and government agencies (both state and federal)</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

No Sale or Sharing of Personal Information

We have not sold or shared personal information in the preceding 12 months. We do not have actual knowledge that we have sold or shared the personal information of minors under 16 years. .

An opt-out preference signal is a signal sent by a platform, technology or mechanism that communicates the choice to opt-out of the sale or sharing of your personal information. Since we do not sell or share your personal

information the receipt of an opt-out preference signal will not impact how we collect, use or disclose your personal information.

Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you, subject to certain exceptions ("request to delete" or "RTD"). To submit a RTD you may call us at [Insert Toll Free Number] or submit an email request to **Bank of the Orient** at [insert appropriate email address] with the phrase "California Request to Delete" in the subject line. We will ask that you provide us with certain information in order to verify your identity, such as a code sent to an email address, we have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Right to Opt-Out of the Sale or Sharing of Personal Information

If a business sells or shares your personal information you have the right to opt-out of the sale or sharing of your personal information. We do not, and will not, sell or share your personal information.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

You have the right to not be discriminated against because you exercise any of your rights under the CCPA, including an employee, applicant, or independent contractor's right to not be retaliated against by their employer.

Right to Correct Personal Information You have the right to correct the inaccurate personal information that we collect or maintain about you. The right to correct grants you the right to request that a business correct inaccurate personal information we maintain about you ("request to correct" or "RTC"). To submit a RTC you may call us at [Insert Toll Free Number] or submit an email request to Bank of the Orient at [insert appropriate email address] with the phrase "California Request to Correct" in the subject line. We will ask that you provide us with certain information in order to verify your identity, such as a code sent to an email address, we have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Right to Limit Use of Sensitive Personal Information If we collect, use or disclose your sensitive personal information for certain reasons other than those specified in the CCPA regulations adopted by the California Privacy Protection Agency (11 CCR Section 7027(m)), you have the right to limit our use or disclosure of the sensitive personal information (referred to as the "Right to Limit Use").

We do not use or disclose the categories of sensitive personal information for purposes other than those specified as permissible uses set forth in the CCPA and its implementing regulations (11 CCR Section 7027(m)) adopted by the California Privacy Protection Agency.

Authorized Agent

You can designate an authorized agent to make a request under the CCPA (including an RTK, RTD or RTC) on your behalf. If you use an authorized agent to submit a request to exercise your RTK, RTD or RTC, please send a certified copy of your written declaration or documentation showing that you have authorized the authorized agent to act on your behalf to submit a RTK, RTC or RTD to the Bank of the Orient. When processing a request submitted by an authorized agent, we may ask you to verify your own identify directly with us prior to processing the request.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

For More Information If you have questions or concerns regarding this CCPA Privacy Policy or our other privacy policies or practices, you may contact us by mail at: 1023 Stockton Street, San Francisco, CA 94108, send us an email at info@bankorient.com, or call us at 1-800-881-2686, Monday – Friday 9:00AM – 5:00PM PT.