



## California Privacy Rights Act Disclosure

This disclosure provides an explanation of your rights under the California Privacy Rights Act of 2020 ("CPRA"). The California Privacy Rights Act (CPRA) is an extension of the 2018 California Consumer Privacy Act (CCPA). The goal of both laws is to enhance the privacy rights of California residents with regards to the personal information that companies collect about them, giving them the right to see, delete and limit the sale of that data. The CPRA provides the following rights to applicable consumers: (1) Know what personal information is being collected about them; (2) Access personal information that has been collected about them; (3) Request the deletion of their personal information, subject to certain restrictions; (4) Prevent the sharing or sale of their personal information to third parties; (5) Sue or join class-action suits against erring businesses; and, (6) Receive equal service and price even if they exercise privacy rights. Contact your local branch if you are uncertain regarding the applicability of the CPRA.

If you are a California resident you may have certain rights under the California Consumer Privacy Act (Cal. Civ. Code §1798.100 et seq.) 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, on legitimate grounds, deletion of your personal information that we collected;
- 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.

We also must provide in this disclosure 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 CPRA, the sources from which we collect it, and the ways in which we use and disclose it.

The CPRA requires that businesses:

- Only collect personal information that is necessary for legitimate business purposes
- Clearly communicate to consumers about how they use the personal information they collect

- Let consumers know how they can choose to access and edit their personal information as well as how to opt-out of it being sold or shared
- Limit use of sensitive personal information
- Keep consumers' personal information secure
- Not treat consumers any differently for exercising these rights

The CPRA defines personal information as any information that can be used to identify or is associated with a consumer or household:

Personal information includes but isn't limited to:

- Identifying information such as names, addresses, IP addresses, email addresses, and social security, driver's license, and passport numbers
- Commercial data such as property records and purchase histories
- Biometric information, for example face, iris, or voice recognition or fingerprint scanning
- Internet information, including browsing and search history
- Employment and educational information
- Geolocation data
- Sensitive personal information

Sensitive personal information includes any private information that divulges any of the following:

- Personal identification numbers, including social security, driver's license, passport, or state ID card numbers
- Account or debit or credit card numbers combined with passwords or codes that would enable access to the accounts
- A consumer's exact geolocation
- A consumer's racial origin, religious beliefs, or union membership
- A consumer's mail, email, or text message content unless the information was intentionally sent to the business
- A consumer's genetic data, such as DNA samples

Note that any sensitive personal information that is publicly available is not considered sensitive personal information or personal information under this law.

## **RIGHT TO ACCESS**

First Commercial Bank (USA) (the “Bank”) may from time to time, and with your permission or at your request, collect and maintain information about you related to” (1) current and historical residential history; (2) current and historical employment history; (3) current and historical financial position, including but not limited to assets, liabilities and net worth; (4) current and historical credit history; (5) current and historical transaction history, including but not limited to application information, transaction details, analyses of transaction details, evaluations of requests for products and services, and documentation related to transactions, and documentation regarding disposition of requests for products and services; (6) personal and professional references; and, (7) other related information deemed necessary to maintain

account relationship and comply with applicable laws, rules and regulations. The Bank collects and maintains your information for the purpose of evaluating your requests for products and services, to properly maintain your accounts with the Bank and to comply with applicable laws, rules and regulations.

If you are subject to the CPRA you have the right to request the categories and specific pieces of personal information that the Bank has collected. To obtain the information you must submit a “Verifiable Consumer Request.” A Verifiable Consumer Request is a request that is made by you on your behalf, by you on behalf of your minor child, or by a natural person or a person registered with the California Secretary of State, authorized by you to act on your behalf. The Bank shall respond to your request within 45 days of receiving your Verifiable Consumer Request” unless the Bank chooses to extend the timeframe to 90 days. The Bank must notify you within the initial 45 day period if it chooses to extend the period to 90 days. You are permitted two requests in a 12-month period. The information provided will cover the 12-month period immediately preceding the request.

### **RIGHT TO DELETE**

If you are subject to the CPRA you have the right to request that the Bank delete any personal information about you which the Bank has collected. You must submit a Verifiable Consumer Request to request deletion of your personal information. Under certain circumstances the Bank is not required to comply with your request to delete personal information. Upon receipt of a Verifiable Consumer Request the Bank will inform you whether your request is subject to the CPRA exceptions and as such, whether the Bank will be unable to delete your personal information.

### **RIGHT TO KNOW**

If you are subject to the CPRA you have the right to request that the Bank disclose to you upon receipt of a Verifiable Consumer Request, the following information: (1) categories of personal information collected about you; (2) categories of sources from which the personal information is collected; (3) business or commercial purpose for collecting your personal information; (4) categories of third parties with whom the Bank shares personal information; and, (5) the specific pieces of personal information the Bank has collected about you.

You may submit a Verifiable Consumer Request via regular mail to: First Commercial Bank (USA), Operations Department, 200 East Main Street, Alhambra, CA 91801. You may also submit your Verifiable Consumer Request via e-mail to [Operations@bankfcb.com](mailto:Operations@bankfcb.com). The Bank shall respond to your request within 45 days of receiving your Verifiable Consumer Request unless the Bank chooses to extend the timeframe to 90 days. The Bank must notify you within the initial 45 days period if it chooses to extend the period to 90 days. You are permitted two requests in a 12-month period. The information provided will cover the 12-month period immediately preceding the request.

## **RIGHT TO OPT OUT**

### **Not applicable**

First Commercial Bank (USA) does not offer an opt-out from the sale of personal information because First Commercial Bank (USA) does not engage in the sale of personal information as contemplated by the CPRA.

## **RIGHT OF EQUAL SERVICE**

The Bank may not discriminate against you because you exercised any of your rights under the CPRA.

## **QUESTIONS**

If you have any questions regarding this disclosure you may call us toll free at (888) 526-0350 or contact your branch of account. You may also write to us at: 200 East Main Street, Alhambra, CA 91801 to the attention of Compliance Officer. For contact information please visit our website at [www.bankfcb.com](http://www.bankfcb.com).