

# Exchange Bank California Privacy Act Privacy Policy

Last Updated December 31, 2019

Exchange Bank is committed to maintaining the security of the personal information of our customers. This privacy notice supplements the information contained in Exchange Bank's general Privacy Notice and is provided pursuant to the California Consumer Privacy Act of 2018 ("CCPA"). The following describes the information we collect about you, how it may be shared, and your rights connected with that information.

A consumer has the right to request that we disclose what personal information we collect, use, disclose and sell. If you wish to submit a verifiable consumer request for personal information we collect, use, discloses or sell you may submit requests using one of the designated methods described below in the Your Rights under CCPA section.

## Collection of personal information

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

Categories of Information We Collect	Pieces of Personal Information
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
Personal information covered by California "safeguards" law (Cal. Civ. Code § 1798.80(e))	A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information may overlap with other categories.
Protected classification characteristics under California or federal law	Sex, marital status and race
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Biometric information	Voiceprints and fingerprints
Internet or other electronic network activity information	Including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with our website, application, or advertisement.

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Geolocation data	
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.
Professional or employment-related information	Work history and prior employer
Non-public education information	Education information, defined as 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 drawn from other personal information	Inferences drawn from any of the information identified listed above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

## Categories of sources from which we collect personal information

We obtain the categories of personal information listed above from the following categories of sources:

- Information you provide to us when applying for or opening a deposit account or loan, or any related products or services
- Information we collect to provide your services
- Information received from credit reporting agencies in connection to services we provide
- Information from third-party identity verification services
- Information from activity on our website ([www.exchangebank.com](http://www.exchangebank.com)), online banking applications, mobile applications, search engines and social media
- Government entities

## Purpose for collecting personal information

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

- To approve or decline loan or deposit account applications
- To service those products and services you have with us
- To consider your job application for hiring
- To prevent fraudulent activity and to secure your accounts
- To meet legal and regulatory requirements
- To provide employment related benefits
- To conduct institutional risk analysis and mitigation

## Disclosure or sale of personal information

We have not disclosed any personal information about consumers to third parties for a business or commercial purpose in the preceding 12 months.

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We do not and will not sell the personal information of consumers to third parties. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

## Your rights under CCPA

You have the right to request that we disclose what personal information we collect, use, disclose and sell. If you wish to submit a verifiable consumer request for personal information we collect, use, disclose or sell you may submit requests using one of the designated methods described below. Once we receive and confirm your verifiable consumer request, we will provide the following, subject to applicable exemptions and exceptions:

- The categories of personal information we collected about you
- The categories of sources from which the personal information was collected
- The categories of personal information that the business sold or disclosed for a business purpose about you
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose
- The business or commercial purpose for collecting or selling personal information

You have the right to request the deletion of any personal information about you which we have collected or maintained. If you wish to submit a request to delete the personal information we collected or maintain about you, you may submit requests using one of the designated methods described below. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your information, subject to applicable exemptions and exceptions.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. If you submit a request on behalf of another person, we may require proof of authorization and verification of identity from the person for whom you are submitting the request.

In some instances, we may not be able to honor your request if we cannot verify your identity or if we cannot verify that you have authorization to make the request. We will not honor requests where an exception applies or the personal information is not subject to the CCPA's access or deletion rights. We will advise you in our response if we are unable to honor your request. We will work to process all verified requests within 45 days pursuant to the CCPA and if we need an extension for up to an additional 45 days to process your request, we will provide you an explanation for the delay.

You may submit a request by one of the following designated methods:

- By calling our toll-free number 1.800.995.4066 or
- By submitting your request through our website's contact form located [Here](#) or
- By submitting your request in-person at any of our Exchange Bank branch locations

You may only make a verifiable consumer request twice within a 12-month period and the request must:

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- 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

## Non-Discrimination for exercising your privacy rights

You have a right not to receive discriminatory treatment by us for the exercise of any privacy rights conferred by the California Consumer Privacy Act (California Civil Code § 1798.100 et seq.)

## Changes to our privacy notice

We may change or update this disclosure from time to time. When we do, we will post the revised Disclosure on this page with a new “Last Updated” date.

## Contact for more information

You may contact us with questions or concerns about this disclosure and our practices by contacting us [here](#).