



## **California Consumer Privacy Act (CCPA) Online Privacy Policy**

Effective: January 1, 2025

Last Updated: December 15, 2024

This notice is provided pursuant to the CCPA and explains the practices of Partners Bank of California (we, us, our, PBOC) related to the collection and use of the Personal Information (PI) of California residents. It explains what PI we collect, where we collect it from, what we use it for, who we disclose it to, how long we keep it, the rights California residents may have, and how to exercise those rights.

The requirements of the CCPA do not apply to personal information collected that is covered by other federal and state privacy laws, including the Gramm Leach Bliley Act (GLBA), Fair Credit Reporting Act and other laws.

Partners Bank of California collects PI in a variety of contexts. For example, we collect PI to provide financial products and services, for our human resource, and vendor management purposes. The PI that we collect about a specific California resident will depend on, for example, our relationship or interaction with that individual.

“Personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

### **Introduction**

A consumer has the right to request that a business that collects personal information about the consumer disclose to the consumer the following:

- The categories of personal information it has collected about that consumer.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom the business shares personal information.
- The specific pieces of personal information it has collected about that consumer.

A business that collects personal information about a consumer must disclose to the consumer the information specified above upon receipt of a verifiable consumer request from the consumer. Additionally, the business must associate the information provided by the consumer in the verifiable consumer request to any personal information previously collected by the business about the consumer and identify by category or categories the personal information collected about the consumer in the preceding 12 months by reference to categories enumerated in California Civil Code Section 1798.130(c)

that most closely describes the personal information collected.

A consumer has the right to request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to that consumer:

- The categories of personal information that the business collected about the consumer.
- The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
- The categories of personal information that the business disclosed about the consumer for a business purpose.

A business that sells personal information about a consumer, or that discloses a consumer's personal information for a business purpose, must disclose the information specified above to the consumer upon receipt of a verifiable consumer request from the consumer. Additionally, the business must identify the consumer and associate the information provided by the consumer in the verifiable consumer request to any personal information previously collected by the business about the consumer and identify by category or categories the personal information of the consumer that the business sold in the preceding 12 months by reference to the categories enumerated in California Civil Code Section 1798.130(c) that most closely describe the personal information, and provide the categories of third parties to whom the consumer's personal information was sold in the preceding 12 months by reference to the same enumerated categories. The business shall disclose the information in a list that is separate from a list generated for the purposes of California Civil Code Section 1798.130(c).

The CCPA defines a "sale" as the disclosure of PI for monetary or other valuable consideration. Partners Bank of California does not sell and has not sold PI collected in the preceding 12 months to any third party.

#### **Partners Bank of California Collection and Disclosure of Personal Information**

Partners Bank of California collects and discloses the following categories of information for business purposes: Name, address, tax ID number, driver license, passport or ID card number, date of birth, telephone number, email address, bank account number, employment information, racial or ethnic origin, the contents of mail, health information other financial information, dependent/beneficiary PI, benefit elections, internet or other electronic network activity including IP address, geolocation, browsing history and website interaction.

Partners Bank of California collects PI from a variety of sources including:

- Directly from you in credit applications, deposit applications, employment applications and from your devices when you visit pbofca.com or our social media webpages.
- Public records or widely available sources including information from the internet, media and other records made available by federal, state and local government entities.
- Outside sources that provide data to support activities such as fraud prevention, underwriting and marketing.
- Outside sources that provide PI to support human resources and workforce management

activities.

- Outside sources that provide data as part of providing products and services, completing transactions, supporting our everyday operations or business management and development.

Partners Bank of California collects PI for a range of purposes including: validating identification, communication with you, processing payroll, processing financial transactions, offering employment benefits, tracking benefit eligibility, target marketing and personalizing advertising that may be of interest to you.

Partners Bank of California also shares PI collected with our processors and vendors who provide services on our behalf including:

- Outside service providers subject to appropriate confidentiality and use restrictions as part of providing products and services, completing transactions, support our every operations or business management and development.
- Outside service providers subject to appropriate confidentiality and use restrictions to whom we provide data to support human resources and workforce management.
- Companies or individuals that represent California residents such as an accountant, financial advisor or person holding power of attorney on behalf of a California resident.
- Government agencies including to support regulatory and legal requirement.

## **CCPA Rights**

California residents have the right to request that Partners Bank of California disclose the PI we have collected, used and disclosed to our service providers.

California residents also have the right to correct inaccurate their personal information that we maintain.

California residents also have the right to request that their personnel information be deleted. Note: We may deny a request to delete if an exception applies or if we are unable to determine or confirm the identity of the person making the request. Partners Bank of California will advise you in our response if we are unable to honor your request.

To make a request for information collected and disclosed or to make a request to delete PI please call: (866) 323-2741 or write to us at [support@pbofca.com](mailto:support@pbofca.com).

Please identify which privacy right(s) you would like to exercise, include your name, address a copy of a government issued photo ID (Driver's license, State ID or Passport) and a detailed description of your current or previous relationship with Partners Bank of California.

Partners Bank of California will endeavor to process requests within 45 days. However, if additional time is needed to process your request (up to an additional 45 days) an explanation for the delay will be provided.

## **Non-Discrimination**

Partners Bank of California shall not discriminate against a consumer because the consumer exercised

any of the consumer's rights under the California Consumer Privacy Act (California Civil Code Section 1798.100 et seq.), including, but not limited to, by:

- Denying goods or services to the consumer.
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services to the consumer.
- Suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.

Nothing in California Civil Code Section 1798.125(a) prohibits a business from charging a consumer a different price or rate, or from providing a different level or quality of goods or services to the consumer, if that difference is reasonably related to the value provided to the consumer by the consumer's data.

#### **Changes to the CCPA Privacy Policy**

Changes to this policy may be made at any time. When changes are made, the revised Policy will be posted to [pbofca.com](http://pbofca.com) and will include a new "Effective" date.

If you have questions regarding your rights under the CCPA, please call us at: (866) 323-2741