

CCPA PRIVACY POLICY

Effective Date: _____, 20____

1. DISCLAIMER.

Your privacy and rights under the California Consumer Privacy Act (CCPA) and the California Online Privacy Protection Act (CalOPPA) are important to us, and we offer this document as a resource to view how we collect, manage, store, and use your Personal Information in the day-to-day running of our website (“Privacy Policy”).

This Privacy Policy, intended for California residents, can be applied to all website users to disclose how we collect, manage, store, and use your Personal Information as defined under CIV 1798.140(v) of the California Consumer Privacy Act (CCPA).

2. THE BUSINESS.

This Privacy Policy is between you and the following organization:

- **Company Name:** _____
- **Website URL:** www. _____ (“website”)
- **Address:** _____
- **Phone:** (____) ____ - _____
- **E-Mail:** _____

Hereinafter “we,” “our,” or “us.”

3. CATEGORIES OF PERSONAL INFORMATION.

In the past 12 months, we have or had the intention of collecting the following: (check all that apply)

- **Identifiers.** A real name or alias, postal address, signature, home phone number or mobile phone number, bank account number, credit card number, debit card number, or other financial information, physical characteristics or description, e-mail address; account name, Social Security Number (SSN), driver's license number or state identification card number, passport number, or other similar identifiers.
- **Protected Classification Characteristics.** Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

- **Commercial Information.** Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Biometric Information.** Genetic, physiological, behavioral, and biological characteristics or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
- **Internet or Other Similar Network Activity.** Browsing history, search history, and information on a consumer's interaction with a website, application, or advertisement.
- **Geolocation Data.** Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with permission in on your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
- **Sensory Data.** Audio, electronic, visual, thermal, olfactory, or similar information.
- **Professional or Employment Related Information.** Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records; Emergency contact information, such as the name, phone number, address, and e-mail address of another person in the context of having an emergency contact on file, Personal information necessary for us to collect and retain to administer benefits for you and another person relating to you (e.g., your spouse, domestic partner, and dependents), such as their name, Social Security Number, date of birth, telephone number, e-mail, and address.
- **Non-Public Education Information (per the Family Educational Rights and Privacy Act (20 U.S.C Section 1232g, 34 C.F.R. Part 99)).** Educational records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
- **Inferences Drawn From Other Personal Information.** Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Hereinafter known as "Personal Information."

4. CATEGORIES OF SOURCES OF INFORMATION WE COLLECT.



We collect Personal Information from the following sources: (check all that apply)

- **Using the Website.** We collect certain information from your activity on our website, starting when you first arrive on a webpage, including laptops, mobile phones, and other electronic devices. We may collect your IP address, device ID, advertising identifiers, browser type, operating system, internet service provider, pages visited (including clicks and time on site), and other related log information. For mobile phones, we may collect your device's GPS signal or other information about nearby Wi-Fi access points and cell towers.

- **Creating a User Profile or Account.** We may collect information directly from you or an agent authorized to act on your behalf. For example, if you, or someone acting on your behalf, provides your name and e-mail to create a profile or an account. We also collect information indirectly from you or your authorized agent. This can be done through information we collect from you while providing content, products, or services.

5. COOKIES POLICY.

In the past 12 months and in the present time, our website: (check one)

- **Does NOT Use Cookies.** We do not utilize cookies on our website in any manner.

- **Does Use Cookies.** We, in addition to our service providers, affiliates, agents, advertisers, or other parties in connection with the website, may deploy cookies, web beacons, local shared objects, and other tracking technologies for various purposes. Such shall be for business use, marketing purposes, fraud prevention, and to assist in the day-to-day operations of the website.

a.) **“Cookies” Defined.** Cookies act as data that is communicated between a user's web browser and a website. They are stored on your device to help track their areas of interest, provide the best experience possible, and customize the content, products, services, offerings, and advertisements served on the website. Most web browsers adjust to your browser's settings to decline or delete cookies, but doing so may degrade the experience with our online services.

b.) **1-Pixel Images.** Clear GIFs, pixel tags, or web beacons, which are generally 1-pixel, are transparent images located on a webpage or in an e-mail or other trackable source and may be used on our website in addition to any other communication offered by us. They are often used in connection with advertisements served to you that are interacted with, whether on our website or another online service and shared with us. This type of tracking is specifically meant to recognize users, assess traffic patterns, and measure site or campaign engagement.

- c.) **Flash Cookies.** Local Shared Objects, sometimes known as “flash cookies,” may be stored on your device using a media player or other software. Flash cookies are similar to cookies in terms of their operation but may be managed in your browser in the same manner.
- d.) **First (1st) Party & Third (3rd) Cookies.** First (1st) party cookies are stored by a domain (website) you are visiting directly. They allow the website's owner to collect analytics data, remember preferred settings (e.g., language, currency, etc.), and perform related functions. Third (3rd) party cookies are created by domains other than those you are visiting directly, hence its name “third (3rd) party.” They may be used for cross-tracking, retargeting, and ad-serving.
- e.) **Essential Cookies.** Such cookies are technically necessary to provide website functionality. They act as a website's basic form of memory, used to store the preferences selected by a user on a given website. They are essential to a website's functionality and cannot be disabled by users. As an example, an essential cookie may be used to recognize a past user from having to log in each time they visit a new page in the same session.
- f.) **Performance and Function Cookies.** Such cookies are used to enhance the performance and functionality of a website but are not essential to its use. However, without these cookies, certain functions (like videos) may become unavailable.
- g.) **Advertising Cookies.** Such cookies are used to customize a user's ad experience on a website. When using data collected from cookies, websites can prevent the same ad from appearing multiple times in the same session or that does not offer a pleasant experience. Advertising cookies may be used to serve a user with related services, products, or offerings that they may have shown a level of related interest in their past user history.

6. ADVERTISEMENTS.

In the past 12 months and in the present time, our website: (check one)

- **Does NOT Have Advertisements.** We do not have display ads or any 3rd party paid affiliates on our website.
- **Does Have Advertisements.** You may see advertisements by use of our website. These advertisements may be for either 1) our own products, services, offerings, and content 2) via 3rd party advertising networks (such as AdSense) or or 3) Affiliate programs such as the Amazon.com Associates Central or related services. The advertisements presented to you may use your personal information and may contact you through other channels outside of the website, such as telephone, e-mail, and mailings. We do not disclose your personal information to 3rd party advertisers except as permitted by applicable laws and

regulations, and we require that such 3rd party advertisers follow such applicable laws and regulations when they collect information from you to transfer such information to us.

7. HOW WE USE PERSONAL INFORMATION.

We may use or disclose your Personal Information for the following purpose: (check all that apply)

- **Offerings.** To provide products, services, and offerings that serve the best-matched advertisements;
- **Alerts.** To provide e-mail alerts and other communications regarding our products, services, and offerings that may be of interest or that you registered to receive;
- **Obligations.** To carry out any obligations for paid products, services, offerings, or any obligations under our terms and conditions or terms of use;
- **Feedback.** To get feedback on website improvements and generally provide an overall better experience;
- **Testing.** For testing, research, and analysis, of user behavior on the website;
- **Protection.** To protect against fraud, safeguard data, and the general security of the website;
- **Security.** To detect security incidents, verify human users, and avoid being subject to malicious, deceptive, fraudulent, or illegal activity;
- **Law Enforcement.** To respond to law enforcement requests as required by applicable law, court order, or governmental regulations;
- **Intended Purpose.** As described for the intended purpose when collecting your personal information; and
- **Assessment.** To evaluate or conduct a merger, divestiture, restricting, reorganizing, dissolution, or outright sale, either wholly or partially, of our assets in which your Personal Information becomes a part of such sale.

Our usage of your Personal Information may change over time, and when such changes occur, we will update this Privacy Policy accordingly.

8. SELLING PERSONAL INFORMATION.

Our policy is the following: (check one)

- **We Do NOT Sell Your Personal Information.** It is not our policy to sell Personal Information, and we have done so in the preceding 12 months.
- **We Do Sell Your Personal Information.** As defined under the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by

electronic or other means a consumer's Personal Information for a business purpose to a third (3rd) party for valuable consideration. This means that in the preceding 12 months, we have sold consumers' Personal Information as mentioned in the categories listed in Section 3 of this Privacy Policy.

9. SHARING PERSONAL INFORMATION.

We disclose your Personal Information to 3rd parties for business purposes. The general categories of 3rd parties that we share with are as follows:

- Our 3rd party service providers that, without their services, our website would not be able to function in its current manner;
- Affiliated websites and businesses in an effort to bring you and our users improved services, products, and offerings;
- Other companies, affiliate partners, and 3rd parties that help us advertise products, services, and offerings to you, other users, and potential new customers;
- Third (3rd) parties to whom you, or an authorized agent on your behalf, authorized us to disclose your Personal Information;
- Third (3rd) parties or affiliates in connection with a corporate transaction, such as a sale, consolidation, or merger of our financial institution or affiliated business; and
- Other third (3rd) parties to comply with legal requirements or to disclose Personal Information to government authorities per the rule of law;

In the last 12 months, it is recognized that we have disclosed the aforementioned categories of Personal Information for business purposes.

10. RIGHT AND CHOICES FOR CALIFORNIA RESIDENTS.

If you are a California resident, this Section describes your rights and choices regarding how we collect, share, use, and protect your Personal Information, how to exercise those rights, and limits and exceptions to your rights and choices under the CCPA.

- a.) **Exceptions.** The rights and choices in this Section do not apply to you if the information being collected is:
 - Aggregate consumer information;
 - Deidentified Personal Information; and
 - Publicly available information.
- b.) **Access to Information.** If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months from the date we receive your request. Once we receive and confirm your request on your behalf, we will disclose it to you or your representative:

- The categories of Personal Information we collect;
- The categories of sources for the Personal Information we collect;
- Our business or commercial purpose for collecting or selling such Personal Information;
- The categories of third parties to whom we sold or disclosed the category of Personal Information for a business or commercial purpose;
- The business or commercial purpose for which we sold or disclosed the category of Personal Information; and
- The specific pieces of Personal Information we collected about you in a form that you can take with you (also called a “Data Portability Request”).

c.) **Deletion Request Rights.** You have the right to request that we delete any of your Personal Information that we collect from you and retain, subject to certain exceptions. Once we receive and verify your request, we will delete and direct our service providers to delete your Personal Information from our records unless an exception applies. We may deny your deletion request if retaining the Personal Information is necessary for us or our service providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those for such activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, or exercise another right provided by law;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws when the businesses' deletion of the Personal Information is likely to render impossible or seriously impair the achievement of such research if you previously provided informed consent.
- Enable solely internal and lawful uses of such Personal Information that are compatible with the context in which you provided it.

d.) **Exercising Access, Data Portability, and Deletion Rights.** To exercise the access, data portability, deletion rights, or any other rights mentioned herein, a consumer or a consumer's authorized agent may submit a verifiable request to us by using the contact details in Section 2.

e.) **Requests.** You may only make a verifiable consumer request for access or data portability, in relation to this Section, twice within a 12-month period. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information is related to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided via a verifiable consumer request to verify the requestor's identity or authority to make the request.

f.) **Authorized Agent.** An authorized agent is any person or legal entity registered with the Secretary of State or similar office that you have authorized to act on your behalf. If a request is made by an authorized agent acting on your behalf, we may require the following:

- Submission of evidence by you with your permission for the authorized agent to submit a verifiable request on your behalf;
- For you to directly acknowledge, via electronic communication, that the authorized agent is allowed to act on your behalf;
- Require the authorized agent to verify their identity; or
- For a power of attorney document to be submitted that is signed in accordance with state law.

We reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

g.) **Response Timing and Format.** As required under CCPA, we agree to respond to any verifiable consumer request within 45 days of its receipt. If we require more time, with a maximum of 90 days, we will inform you, in writing, of the reason. Such notification will be by e-mail unless there is another preferred communication method provided.

Any response we provide will cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the Personal Information from one entity to another entity without hindrance.

No fee will be charged to process or respond to your verifiable consumer request.

h.) **Right of Non-Discrimination.** We do not discriminate against you for exercising any of your rights in this Privacy Policy and under applicable laws. Unless permitted by law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods, services, and offerings, including through granting discounts or other benefits, imposing penalties; or
- Provide you with a different level of quality of goods or services.

11. CHANGES AND AMENDMENTS.

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we agree to notify you by e-mail or other preferred communication methods.

12. LINKING TO 3RD PARTIES.

We may provide links to 3rd party sources such as websites, applications, content, or software (“3rd Parties”). When you use a link online to visit 3rd Parties, you will be subject to their privacy policy and the jurisdiction of governing law. It is recommended to familiarize yourself with its terms and disclosures regarding your Personal Information. We are not responsible for the handling of your Personal Information when using, accessing, or visiting 3rd Parties.

13. SECURITY & PROTECTION.

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to Personal Information. This includes device safeguards used in accordance with industry standards.

It is understood by you that the Personal Information you submit to us electronically may not be secure when it is transmitted to us. Specifically, we recommend that you do not use unsecured or public channels to communicate sensitive or confidential information.

14. CONTACT.

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Information, your choices, or your rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us by using the details mentioned in Section 2 of this Privacy Policy.