

# Seattle Bank California Consumer Privacy Act (CCPA) Notice

Last Update: 03/27/2023

This California Consumer Privacy Act Notice (“Notice”) is provided by Seattle Bank, which is referred to in this Notice as “we,” “us,” or “our,” and applies to all California residents referred to as “consumers,” “you” or “your.”

This Notice explains how we collect, use, retain, and disclose personal information about California residents. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (the “CPRA”). The CCPA only applies to information about residents of California. We advise that you read the Notice in its entirety. Sections I and II of this Notice, which describes our collection and use of information, also serves as our **Notice At Collection** for California residents for purposes of the CCPA.

Under the CCPA, “personal information” is information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This information is referred to in this Notice as “Personal Data.”

## I. Categories of Personal Data that We Collect

Keeping Personal Data secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural, and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

We collect Personal Data in a variety of contexts. For example, we collect Personal Data to provide financial products and services and for vendor management purposes.

The Personal Data that we collect about a specific California resident will depend on our relationship or interaction with that individual.

During the past 12 months, we may have collected the following categories of Personal Data.

1. **Personal Identifiers** — Personal unique identifiers, such as real name, alias, postal address, telephone number, email address, mother’s maiden name, place of birth, high school attended, and federal or state issued identification numbers including Social Security number, individual taxpayer identification number, driver’s license number, and passport number.
2. **Personal Information** — Personal information, including contact details, financial information (e.g., account number and balance, transaction history, credit history, credit score), payment card details (e.g., credit and debit card numbers), and medical and health insurance information as well as personal information categories listed in Cal. Civ. Code 1798.80(e).
3. **Characteristics of Protected Classes** — Characteristics of protected classes or groups under state or federal law, such as gender, age/date of birth, race, disability, military status, citizenship, immigration status, and marital status.
4. **Commercial Purchase Information** — Purchase information, such as records of personal property, products and services obtained, and transaction histories.

5. **Internet or Online Information** — Internet or online information (e.g., IP Address, information in cookies and pixel tags, browsing history) and information regarding interaction with our websites, applications, or advertisements (e.g., device identifier or identifying information, characteristics, or settings about the device you use to access our online services, and mobile device information (with permission, such as location, contacts, camera)).
6. **Geolocation Data** — Geolocation data, such as device location.
7. **Sensory Data** — Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recording. These data types are typically collected during phone and in-person contact for security and training purposes.
8. **Employment Information** — Professional or employment-related information, such as work history and prior employer, title, salary, references, information from background checks, resumes, and employment files.
9. **Education Information** — Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and confirmation of graduation; and student financial information, including tuition costs and reimbursement.
10. **Sensitive Personal Information** —
  - Social Security number, individual taxpayer identification number, driver’s license, state identification card, or passport number;
  - Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, PIN, password, or credentials allowing access to an account;
  - Precise geolocation;
  - Racial or ethnic origin, religious or philosophical beliefs, citizenship, or immigration status; and
  - Biometric information processed to uniquely identify a consumer.

**II. Why We Collect Personal Data and How We Use and Disclose It**

The purposes for which we collect, use, and disclose Personal Data depend on, among other things, our relationship or interaction with specific California residents. The table below lists the purposes for which we collect, use, and disclose Personal Data in different contexts.

Purposes for Collection, Use and Disclosure	Examples
<p><b>Provide and manage products and services</b></p>	<ul style="list-style-type: none"> <li>▪ Establish your account(s) and preferences, process transactions for our products and services including checking accounts, credit cards, loans, as well as additional products for businesses such as commercial financing and payment services.</li> <li>▪ Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications.</li> <li>▪ Respond to your inquiries and fulfill your requests.</li> <li>▪ Provide important information regarding the products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Allow you to apply for products or services (for example, to prequalify for a loan or to open an account) and evaluate your eligibility for such products or services.</li> <li>▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners, and financial institutions.</li> </ul>
<p><b>Support our everyday operations, including to meet risk, legal, and compliance requirements</b></p>	<ul style="list-style-type: none"> <li>▪ Perform accounting, monitoring, auditing, and reporting.</li> <li>▪ Enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence.</li> <li>▪ Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims.</li> <li>▪ Enable the use of service providers for business purposes.</li> <li>▪ Comply with laws, regulations, policies, procedures, and contractual obligations.</li> <li>▪ For compliance, fraud prevention, and safety purposes, including protecting the security of account and personal information.</li> <li>▪ Respond to court orders, lawsuits, subpoenas, and government requests.</li> <li>▪ Collect information through our social media pages and other online interactions with you to assist in verifying your identity and account status. We may combine this online information with information collected from offline sources or information we already have.</li> <li>▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners, and financial institutions.</li> </ul>
<p><b>Manage, improve, and develop our business</b></p>	<ul style="list-style-type: none"> <li>▪ Personalize, develop, improve, and market our products and services.</li> <li>▪ Conduct research and analysis, including to drive innovation.</li> <li>▪ Manage the methods and devices you use to access our sites.</li> <li>▪ Support customer relationship management.</li> <li>▪ Personalize your experience on our websites and enhance websites.</li> <li>▪ Conduct research and analysis, identify usage trends, determine effectiveness of promotional campaigns, and drive product and services innovation.</li> <li>▪ Evaluate and engage in mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.</li> <li>▪ Obtain support for fulfilling the above purposes from our service providers and from our professional services, business, and marketing partners.</li> </ul>
<p><b>Sensitive Personal Information as permitted by law</b></p>	<ul style="list-style-type: none"> <li>▪ Perform services for our business, provide goods or services as requested by individuals, and ensure security and integrity.</li> <li>▪ Short term transient use such as displaying first party, non-personalized advertising shown as part of a current interaction with us, where the information is not disclosed to a third party and is not used to build a profile or otherwise alter the California resident's experience outside the current interaction with us.</li> <li>▪ Process and fulfil orders, maintain and service accounts, provide customer service, verify customer information, process payments, and provide financing.</li> <li>▪ Activities relating to quality and safety control or product improvement.</li> <li>▪ We do not collect sensitive personal information for the purpose of inferring characteristics about you.</li> </ul>

<b>Marketing and Advertising Purposes</b>	<ul style="list-style-type: none"> <li>▪ Deliver your marketing and advertising communications about our products and services, tailored to your interests or could be more general in nature.</li> </ul>
<b>Provide and manage digital and mobile products and services</b>	<ul style="list-style-type: none"> <li>▪ Information stored on your device, such as location, camera, contacts, or other features you are enrolled in may be used to enrich and simplify your own user experience and improve our services, as well as provide additional security to protect your account.</li> </ul>

**III. Sources of Personal Data**

The sources from which we collect Personal Data depend on, among other things, our relationship or interaction with a specific consumer. The information below lists the categories of sources from which we collect Personal Data in different contexts.

- Directly from you, or other individuals acting on their behalf. For example, documents that you provide us related to the product(s) or service(s) for which you engage or use or purchase from us through physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website, social media) sources.
- Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, and local government entities.
- Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing. Examples may include internet service providers, social networks, operating systems and platforms, advertising networks, and data analytics providers.
- Outside companies or organizations from whom we collect Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.

**IV. Categories of Third Parties and Our Disclosure of Personal Data**

The information below lists the categories of recipients we may disclose Personal Data to for our business or commercial purposes:

- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we disclose Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples may include internet service providers, social networks, operating systems and platforms, advertising networks, and data analytics providers; companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.
- 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 requirements.

- Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties.

The table below shows, for each Personal Data category we have collected, the categories of third parties to whom we disclosed for our business purposes information from that Personal Data category during the preceding 12 months. Full descriptions of the categories of Personal Data and third parties are provided above. We may also disclose any of the categories of personal information listed below: (1) for risk, legal, or compliance purposes; (2) because of a business transfer (or potential business transfer); or (3) based on your consent or instruction.

<b>Personal Data Type</b>	<b>Third Party Category to Whom We May Disclose Personal Data for Business Purposes</b>
<b>Personal Identifiers</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Personal Information</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Characteristics of Protected Classes</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Commercial Purchase Information</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Internet or Online Information</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Sensory Data</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪</li> </ul>
<b>Employment Information</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Education Information</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>
<b>Sensitive Personal Information</b>	<ul style="list-style-type: none"> <li>▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development</li> <li>▪ Representatives of California residents, Professional Advisors, Business Partners</li> <li>▪ Government agencies</li> <li>▪ Outside companies in connection with routine or required reporting</li> </ul>

**Additional Notes:**

- We only use and disclose sensitive personal information to third parties, service providers, and contractors for the business purposes outlined in this notice. The business purposes are what are reasonably necessary to provide you with the products and services we offer. We do not collect or use your sensitive personal information for the purpose of inferring characteristics about you.
- We may disclose anonymous or aggregated information with third parties to help deliver products, services, and content that are tailored to the users of our online services and for other purposes.

**V. Data Retention**

We retain your Personal Data no longer than the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. We will retain copies of your personal information needed to maintain an ongoing relationship with you (e.g., where you are still receiving services from us). Under our record retention policy, we are required to destroy Personal Data after we no longer need it according to specific retention periods. However, we may need to retain all, or a portion, of your Personal Data to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes. These requirements also apply to our third-party service providers.

**VI. Requests Under the CCPA**

The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration. We do not sell and have not, within at least the last 12 months, sold Personal Data, including Sensitive Personal Data that is subject to the CCPA’s sale limitation. We do not share Personal Data for cross-context behavioral advertising within the scope of CCPA. We have no actual knowledge that we sell or share Personal Data of California residents 16 years of age and younger.

If you are a California resident, you have the right to make certain requests about Personal Data:

1. **Access:** You may have the right to request access to Personal Data and information regarding the source of that information, the purposes for which we collected it, and the third parties and service providers with whom we shared it. You can also request information concerning the categories of third parties (if any) with whom we share Personal Information, the categories of Personal Information (if any) we share with third parties or affiliates for those parties to use for direct marketing. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
2. **Deletion:** You may have the right to request that we delete your Personal Data and direct our service providers to do so. Note that in many situations, we may be permitted, or required by law, to maintain copies of your information.
3. **Correction:** You may have the right to request modification to Personal Data that we retain about you. We generally rely on you to update and correct your Personal Data. Note that we may keep historical information in our backup files as permitted by law.
4. **Opt-Out of Sale of Information:** It is our policy not to sell or share Personal Data for cross-context behavioral advertising and we have not done so in the past 12 months. Because we do not sell or share Personal Data for cross-context behavioral advertising, it is not necessary to opt-out from these activities. To opt-out of general marketing activities, please go to <https://www.seattlebank.com/applications/opt-out.html>.

In addition, you have the right to be free from discrimination by a business for exercising your CCPA rights, including the right as an applicant, not to be retaliated against for exercising your CCPA rights.

## VII. Exercising Your Rights

If you are a California resident, you or your authorized agent registered with the California Secretary of State can use any of the following methods to make a request to access, delete, or correct personal information by:

1. Contacting us at **1-888-500-2265**; or
2. Submitting your request at [www.seattlebank.com/privacycenter](http://www.seattlebank.com/privacycenter)

Please provide the following information to identify yourself:

- First and last name
- Contact information such as email and/or physical address
- Social security or individual taxpayer identification number
- Date of birth

Once a request to access, delete, or correct has been submitted, we will attempt to verify that you are the consumer the request applies to. We do that by taking the identifying information you provide and using a combination of other sources of information and the information we have on file. If we are unable to verify your request with the materials you provided, we may reach out to you for additional information.

*Additional information regarding your right to correct inaccurate information:* You may be able to review or update certain account information by logging in and accessing your online account(s) with us. If you cannot change the incorrect information online, or you prefer to request changes offline, please use the “Contact Us”

option on our website, call us or write to us using the contact information listed on your account statements, records, or other account materials, or submit a verifiable consumer request to us on our website.

Upon receipt of a verifiable request for information from you, or an authorized agent registered with the California Secretary of State, we will endeavor to promptly acknowledge your request and complete it within 45 days. If we need an additional 45 days to process your request, we will provide you with an explanation for the extension. You may only submit a verifiable CCPA consumer request twice within a 12-month period. Any disclosures we provide will only cover the 12-month period preceding a verifiable request's receipt.

## **VIII. Responses**

Privacy and data protection laws other than the CCPA apply to much of the Personal Data that we collect, use, and disclose. When these other laws apply, Personal Data may be exempt from, or outside the scope of, a request to access, delete, or correct. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability Act, is exempt from CCPA requests. As a result, we may decline all or part of your request related to exempt Personal Data. This means that we may not provide some, or all, of this Personal Data when you make a request to access. Also, we may not delete or correct some, or all, of this Personal Data when you make a request to delete or correct.

As examples, our processing of or response to a request to access, delete, or correct personal information may not include some or all of the following Personal Data:

- **Consumer Accounts.** Personal Data connected with consumer accounts used for personal, family, or household purposes. We have other privacy notices providing certain information on use and sharing of this data, for example, the Seattle Bank Privacy Notice, available at <https://www.seattlebank.com/privacy-policy.html>.

These types of Personal Data are examples. We have not listed all types of Personal Data that may not be included when we respond to or process requests to access, delete, or correct personal information.

In addition to the above examples, we may not include Personal Data when we respond to or process requests to access, delete, or correct personal information when the CCPA recognizes another exception. For example, we will not provide the Personal Data about another individual when doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Data when it is necessary to maintain that Personal Data to comply with a legal obligation.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request.

## **IX. Authorized Agents**

If you are a California resident, you may authorize an agent registered with the California Secretary of State to make a request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by using the submission methods listed above under "Exercising Your Rights." As part of our verification process, we may request that you provide, as applicable:

- For an individual ("requestor") making a request on behalf of a California resident:
  - The requestor's name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, State ID, or Matricula Card.



- The name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, State ID, or Matricula Card of the California resident on whose behalf the request is being made.
- A document to confirm that the requestor is authorized to make the request. We may accept, as applicable, a signed permission by the California resident on whose behalf the request is made, copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.
- For a company or organization ("legal entity requestor") making a request on behalf of a California resident:
  - The legal entity requestor's active registration with the California Secretary of State.
  - Proof that the California resident has authorized the legal entity requestor to make the request. We accept as applicable, a signed permission by the California resident on whose behalf the request is made, copy of power of attorney, or legal guardianship or conservatorship order.
  - The name; contact information; Social Security or individual taxpayer identification number; data of birth; and driver's license, state ID, or matricula card of the California resident on whose behalf the request is being made. From the individual who is acting on behalf of the legal entity requestor, proof that the individual is authorized by the legal entity requestor to make the request. We accept a letter on the legal entity requestor's letterhead, signed by an officer of the organization.

#### **X. Deidentified Information**

Where we maintain or use deidentified information, we will continue to maintain and use the deidentified information only in a deidentified fashion and will not attempt to re-identify the information.

#### **XI. Changes to this Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. We may change or update this Notice periodically. When we do, we will post the revised Notice on this webpage indicating when the Notice was "Last Updated."

#### **XII. Seattle Bank Companies Providing this Notice**

This Notice is provided by Seattle Bancshares, Inc., and its subsidiaries that either: (1) act as a business within the meaning of the CCPA, or (2) are controlled by Seattle Bancshares, Inc., including the brand CD Valet. As an example, companies providing this Notice include Seattle Bank. This Seattle Bank CCPA Notice is available on our website at: [www.seattlebank.com/privacycenter](http://www.seattlebank.com/privacycenter).

#### **XIII. Contact Us**

If you have any questions or concerns about Seattle Bank's privacy policies and practices, please contact us at [clientdesk@seattlebank.com](mailto:clientdesk@seattlebank.com). Please do not use this email address to send sensitive information or account-specific questions; instead, call **1-888-500-2265** with any account-specific questions.