



## CALIFORNIA CONSUMER PRIVACY ACT POLICY

**EFFECTIVE:** 1/1/2020

**LAST UPDATED:** 9/17/2020

### LEGAL ENTITIES

This disclosure applies to the following legal entities: Valley Republic Bancorp and Valley Republic Bank (VRB).

### APPLICABILITY

Your privacy is important to us. This California Consumer Privacy Policy (“Privacy Policy”) explains how we collect, share, use, and protect your personal information through your online and offline interactions with us. This Privacy Policy includes references and links to our other privacy policies which serve different purposes under various laws and regulations that apply to us.

### INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”).

Please note that personal information does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information; or
- Information excluded from CCPA’s scope including information covered by certain sector-specific privacy laws, including Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CFIPA).

We currently collect the following categories of personal information from consumers:

Category	Pieces of Personal Information	Collected
<b>A. Identifiers.</b>	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.	<b>YES</b>
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	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 includes in this category may overlap with other categories.	<b>YES</b>
<b>C. Protected classification characteristics under California or federal law.</b>	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	<b>YES</b>



VALLEY REPUBLIC BANK.

	medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
<b>D. Commercial Information</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<b>YES</b>
<b>E. Biometric information.</b>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as; fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	<b>No</b>
<b>F. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<b>Yes</b>
<b>G. Geolocation data.</b>	Physical location or movements.	<b>No</b>
<b>H. Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	<b>No</b>
<b>I. Professional or employment-related information.</b>	Current or past job history or performance evaluations.	<b>Yes</b>
<b>J. Non-public education information (per the Family Educational Rights and Privacy Act).</b>	Education 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.	<b>No</b>
<b>K. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<b>No</b>

**CATEGORIES OF SOURCES**

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

- Directly from you. For example, from documents that you provide us related to the product(s) or service(s) for which you engage or use or purchase from us.
- Indirectly from you. For example, through information we collect from you in the course of providing you services.
- From third parties that interact with us in connection with the services we perform. For example, from credit agencies when we review qualifications for applications for our product(s).



## USE OF PERSONAL INFORMATION

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

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to service a loan or engage in a banking transaction, we will use that information to service the loan or process the transaction, including sharing it with third-parties that are involved in such servicing or processing;
- To provide you with information, products, or services that you request from us;
- To provide you with email alerts, event registrations, and other notices concerning our products or services, or events or news, that may be of interest to you;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections;
- To protect you from fraudulent activity and ensure your accounts are secure;
- As necessary or appropriate to protect the rights, property or safety of us, our customers or others;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- When required to respond to legal processes or regulatory examinations, information requests and other inquiries;
- As described to you when collecting your personal information; and/or
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar processing, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## SHARING PERSONAL INFORMATION

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the services described in the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates;
- Service providers; and
- Third parties to whom you or your agent authorize us to disclose your personal information in connection with products or services we provide to you.

## SELLING YOUR PERSONAL INFORMATION

Valley Republic Bank does not sell your personal information.

## YOUR RIGHTS AND CHOICES

### a. Exceptions

The following exceptions apply:

- If you are not a California resident;
- If we collected personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994. How we collect,



## VALLEY REPUBLIC BANK.

- share, use and protect your personal information covered under the FIPA is covered under our Federal Privacy Policy and our California Consumer Privacy Policy and our California Notice at Collect;
- “Aggregated information” that relates to a group or category of consumers, from which consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device;
  - “Deidentified information” that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to you, provided that we have: (i) implemented technical safeguards that prohibit reidentification of your information; (ii) implemented business processes that specifically prohibit reidentification of the information; (iii) have business processes to prevent inadvertent release of deidentified information; and (iv) make no attempt to reidentify the information;
  - The information we have is publicly available from government records.

### **b. Access to Specific Information and Data Portability Rights**

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. Once we receive and confirm your “verifiable consumer request”, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or sharing that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request);
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased (Note: Valley Republic Bancorp and Valley Republic Bank do not participate in the sale of personal information); and
  - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### **c. Identity Verification Process**

- Once the bank has received either your Request to Know or Request to Delete your information, we will verify your identity using Knowledge Based Authentication provided through DocuSign. This authentication process will require you to answer a specific set of questions that will confirm your identity.

### **d. Authorized Agent Verification Process**

- Once your authorized agent has submitted a Request to Know or Request to Delete your information to the bank we will require verification that they are able to act on your behalf, such as a copy of their Power of Attorney over you. After the bank has received verification that your authorized agent is able to act on your behalf, they will be required to complete Knowledge Based Authentication through DocuSign.

### **e. Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer 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 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 responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code 1546 seq.);
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation;
- Meet retention requirements; or,
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**f. Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (888) 521-5070 or
- Emailing us at [customerservice@valleyrepublic.bank](mailto:customerservice@valleyrepublic.bank)

Only you or a person registered with the Secretary of State in your state of residence that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and,
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot complete 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 relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information collected to verify the requestor's identity or authority to make the request. Information collected for verification will include legal names, addresses, the last four digits of an identification number, and documentation related to legal authority.

If we are unable to complete your request, including the inability to delete information, a copy of it will be logged for future reference within our system.

**g. Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. 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 information from one entity to another entity without hindrance.



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We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **h. Non-Discrimination**

We will not discriminate against you for exercising any of your personal information rights. Unless otherwise permitted by law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or,
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods.

### **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage. If no ad-hoc changes are warranted, this privacy notice will be reviewed annually.

### **CONTACT INFORMATION**

If you have any questions or comments about this notice, our Privacy Policies, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us at:

Phone: (888) 521-5070

Email: [customerservice@valleyrepublic.bank](mailto:customerservice@valleyrepublic.bank)

**CALIFORNIA NOTICE AT COLLECTION & FEDERAL PRIVACY POLICY:** To obtain additional information regarding VRB's privacy policies and California Notice at Collection, please visit our website at <https://www.valleyrepublic.bank/privacy>.