



ONLINE PRIVACY NOTICE

Last updated April 7, 2023

Your privacy is important to BAC Community Bank (“the Bank”). This Online Privacy Notice (“Notice”) describes how we manage personal information about you when you interact with us online through our websites, mobile applications, social sites, and surveys (“Services”) using your computer, smartphone, tablet or other mobile devices (“Devices”).

THIS NOTICE EXPLAINS

- How we collect personal information when you visit, use or interact with us online through our online services operated by us or non-affiliated third parties.
- How we use or share that information collected to deliver products and services to you and for advertising purposes.

By accessing or using any of our Services, you confirm your consent and agreement to the terms and conditions of this Notice as may be in effect at that time. If you are no longer using the Services, we may continue to store and protect your personal information pursuant to this Notice and as required by law, including but not limited to risk management, regulatory compliance and audit purposes.

California residents have certain rights under the California Consumer Privacy Act (“CCPA”). To learn more about the personal information we collect, how we may use such information, or to exercise your rights, please visit www.bankbac.com/ccpa.

In the event of a conflict between the terms of this Notice and the terms of the CCPA Disclosure, the terms of the CCPA Disclosure will govern and control California residents.

The Bank works with third-party providers who are contractually obligated to comply with our policies to protect your information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how your online personal information may be collected, used and shared.

INFORMATION WE COLLECT THROUGH THE SERVICES

We collect two basic types of information through our Services, personal information and anonymous information. We also collect location information in connection with our Services, such as Device settings, unique Device identifiers, information about your location, and analytical information that may assist with diagnostics and performance. For your convenience, you may be asked to grant permission for access to your Device’s geolocation data, microphone, camera or photo album. This information may be collected when you use certain services and dependent on your Device’s features and capabilities (such as the location of an ATM or in-store transactions, to upload a photo or file for customer assistance or while video conferencing). You must permit access to your camera, microphone, photos and files. You choose which images you upload and you must consent to video conferencing. Video conferences are not recorded or stored. Images you uploaded may be stored in your profile with the bank. Geolocation, camera, photo and microphone access can be turned off in your device’s settings.

Personal information refers to information that identifies an individual, such as information you may complete



using our Services. This would include your name, address, e-mail address, telephone number, social security number, transaction information, account information, etc.

Anonymous information refers to information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples may include an IP address, website browsing history, demographic information that you provided to us (e.g., your household income) and aggregated or de-identified data.

HOW WE COLLECT INFORMATION

We collect personal information when you provide this information to us directly. For example, we may obtain personal information when you request information, products or services, register for our Services, respond to surveys, contact customer support or otherwise interact with us. We may also collect certain information from identity verification services and consumer reporting agencies, in order to provide some of our Services. We may also receive information about you from other online and offline sources, such as public databases, social media platforms and third parties.

In addition, we may collect information about your activity on the Services automatically using tracking technologies, such as cookies, web beacons, and local shared objects, for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific Device you use to access the Services and/or your online activity.

ONLINE TRACKING TECHNOLOGIES USED TO COLLECT INFORMATION

Our Services use pixel tags, otherwise known as web beacons, to set, read, and/or modify targeting cookies. Pixel tags may be used to obtain information about the Device accessing the Services, such as an IP address, the time the pixel tag is sent, the Device operating system and browser type, and information similar to the foregoing. We use the information collected by pixel tags to deliver more targeted advertising, enhancing the advertising experience for each user.

“Cookies” are small amounts of data the Services can send to a visitor’s Device. They are often stored on the Device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of the Services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience using the Services.

Local Shared Objects, sometimes referred to as “flash cookies,” may be stored on your Device using a media player or other software installed on your Device. Local Shared Objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way.

If you have enabled location services on your phone and agree to the collection of your location when prompted by the Services, we will collect location data when you use the Services even when the app is closed or not in use; for example, to provide fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

If you submit any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Notice.



HOW WE USE THE INFORMATION

We may use information that we collect in order to, among other things:

- Facilitate the creation, maintenance and security of your account
- Communicate with you about your accounts or transactions with us
- Verify your identity and/or location (or the identity or location of your authorized representative) for security, fraud prevention and other risk control purposes
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Send you important information regarding the Services, changes to this Notice and/or other similar administrative information
- Comply with our legal and regulatory obligations
- Enforce our terms and conditions and otherwise protect our rights and operations
- Optimize or improve our products and services
- Provide you with, or evaluate your eligibility for, products and services that you request from us
- Allow you to participate in surveys, sweepstakes, contests and similar promotions, and to administer such promotions (note that these promotions may contain additional disclosures regarding our collection and/or use of your information)
- Send you offers and promotions for our products and services, or products and services that may be of interest to you
- Personalize content and experiences on the Services
- Provide you with advertising based on your activity on the Services and on third-party websites and applications.

We may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties in our discretion.

Our use of information that we collect will be consistent with applicable federal and state law, required disclosures, and choices and controls that may be available to you.



HOW WE SHARE THE INFORMATION

The Bank may share information with third-party service providers, such as data processors and companies that help us provide Services, conduct quality testing, optimize the performance of the Services, provide technical support, and market products and services to you. Third-party service providers are required to apply appropriate security measures to protect your information.

When permitted or required by law, we may share information with law enforcement, government agencies or other third parties.

DATA SECURITY AND RETENTION

The Bank uses commercially reasonable administrative, technical, and physical security measures to protect personal information collected through the Services against theft, loss and unauthorized access, use, modification and disclosure.

However, no security measure can be guaranteed to be absolutely secure, and we disclaim any representation or warranty that our commercially reasonable administrative, technical, and physical security measures or those of our service providers are invulnerable to breach or compromise.

We may retain your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Notice or at the time of collection; or (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements.

HOW TO LIMIT YOUR INFORMATION

Your Device may have options to refuse or remove certain technology to gather information. This may include deleting or not accepting the use of cookies and not allowing the functionality of geolocation, camera, photo, file and microphone access on the Device. Please refer to your Device's manual on how to customize these particular settings. Setting information limitations may impact features in our Services.

Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise its policy on responding to these signals.

E-MAIL NOTIFICATIONS

If you received an e-mail from us, (i) your e-mail is either listed with us as someone who has expressly shared this information for the purpose of receiving electronic information (ii) you have registered, have an existing relationship with us, or are using our Services. Any promotional e-mail contains an unsubscribe link to cease receiving promotional e-mails. If you would like to discontinue all electronic communications, please contact us as described below to Opt-Out of all electronic communications. Please note, that if you withdraw consent to all electronic communications, you may no longer be able to use some or all of the Services.

SMS TEXT MESSAGES

If you received an SMS Text Message from us, you have registered or requested us to contact you in this method. We may send notifications such as account or fraud alerts. If you would like to discontinue SMS Text



Messages, you can turn off alerts through mobile and online banking. If you would like to turn off fraud alerts, please contact us to have your cellular number unlinked from the Services.

OTHER WEB SITES

The Services may contain links to other websites. Those other sites may be operated by other third-party companies not affiliated with us. Once you leave the Bank's Services and access another website, you should be aware that you are subject to the privacy and security policies of that other website. The provision of a link to any other website is for your convenience and does not signify our endorsement of such website or its content. We have no control over, do not review, and cannot be responsible for these outside websites or their content.

EXTERNAL AGGREGATION SERVICES

You have the responsibility to help us protect your accounts. Consider the risk of revealing your username, password, or other credentials to any person or third party. By providing your username, password or other credentials to any person or third party (including an aggregation service) you authorize that person or third party to initiate transfers to or from your account.

Some third-party companies offer aggregation services that allow you to consolidate your financial account information from a variety of sources, so that you can view all your account information at a single online location. For example, an aggregation service might collect and consolidate your checking and savings account balances at your bank, the value of your stocks and bonds in your brokerage account and your frequent flier mileage information from an airline. In order to do so, the aggregator may request access to personal information, including identification information, account information, personal IDs and passwords from you for each individual website. You must provide your permission and access to your personal information to allow these services to collect this data.

Please use caution when providing personal information to aggregation services. You should always ensure that the aggregator has appropriate policies and practices in place to protect the privacy and security of any personal information to which the company is gaining access.

The Bank is not responsible for the use or disclosure of any personal information accessed by a company or an individual to whom you provide the personal ID and password required to access your accounts through the Service.

If you do elect to provide your personal ID, password or other information about your accounts with us to an aggregation service, you will be unable to contest the validity of any transaction initiated by the aggregator, whether or not you were aware of the specific transaction. Should you decide to revoke the authority you have given to an aggregation service, you may contact us at your local branch or call 1-877-226-5820, in which case we may need to block your account until we issue new access codes.

SOCIAL MEDIA PLATFORMS

The Bank may interact with registered users of various social media platforms. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile or posts), is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content. Please do not post confidential, personally identifiable information such as first name, last name, social security number(s),



mother's maiden name and account number(s) or passwords. Criminals can use this information to steal your identity, open fraudulent credit accounts and loans in your name, or access your existing accounts.

ONLINE BEHAVIORAL ADVERTISING

We may use personal information in connection with our online advertising activity. Online advertisements may be in the form of banner ads, splash ads, or other formats. We may contract with third-party advertising companies to promote our products and services and serve related advertisements on our Services that are owned or operated by parties not affiliated with us.

In order to better understand which of our products and services may be of interest to you and to tell you about those products and services, we may, from time to time, collect information about your online activities over time and across third-party websites and online services. We also may engage third-party service providers to collect information about your online activities over time and across third-party websites and online services when you use our Services. Serving advertisements based on a person's online activities over time and across third-party websites and online services is generally known as "online behavioral advertising."

CHILDREN'S ONLINE PRIVACY

Our Services are available through general audience websites and are not directed toward individuals under the age of 13. Through our Services, we do not knowingly collect or use personal information from children under the age of 13.

UPDATING INFORMATION

If you wish to update or have any concerns regarding your information, please use the Contact Us option on our website, or call or write to us using the following contact information:

- Call Banking Services at 877-226-5820
- Write to us at BAC Community Bank, Banking Services Department
P.O. Box 1140, Stockton, CA 95201-1140

CHANGES

We may add to, delete from, or otherwise amend and update this Notice from time to time. When we amend our online privacy information, we will post information on our website directing users to review the updated Notice. Your continued use of the Services following notice of any such changes shall indicate your acknowledgment of such changes.