Last updated: September 1, 2023

# California Consumer Privacy Act (CCPA) Notice

The words "we", "us" and "our" mean Royal Business Bank, and the words "you" and "your" mean you, the consumer who resides in the California State. We adopt this notice to comply with the California Privacy Rights Act (CPRA) that amended to California Consumer Privacy Act (CCPA).

This Notice explains what personal information we collect and how we use of the personal information about California residents. The Notice also explains certain rights that California residents have under the CCPA. This Notice explains how California residents can exercise their rights under the CCPA to request that we: (1) provide certain personal information that we have collected about them during the past 12 months, along with related information described below, or (2) delete certain personal information that we have collected from them.

#### **Collection of Personal Information**

During the past 12 months, we have collected the following categories of your personal information. We have also provided each category of sources from which we collected the personal information, the business or commercial purpose for collecting the information, and the categories of third parties with whom we share the personal information.

# Categories Personal Information that we may collect

- Identifiers: 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, signature, physical characteristics or description, address, telephone 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 or other similar identifiers
- **Employment Information**: Federal & state tax filing, emergency contact, beneficiary, dependent, spouse, immigration status, legal issue, health information, work history, salary
- **Biometric information**: Imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template can be extracted (faceprint, a minutiae template, voiceprint), and keystroke patterns, gait patterns, and sleep, health, or exercise data that contain identifying information
- Image and Video: Picture, moving visual images with or without audio
- Commercial information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- California State or Federal Law characteristics of protected classifications: Race, color, religion, national origin, sex, gender identity, gender expression, sexual orientation, marital status, medical condition, military or veteran status, national origin, ancestry, disability, genetic information, request for family care leave, request for leave for an employee's own serious health condition, request for pregnancy disability leave, retaliation for reporting patient abuse in tax-supported institutions, age (over 40)
- Internet or other electronic network activity information:
  - o Browsing history, search history, and information regarding a consumer or individual's interaction with an Internet Web site, application, or advertisement
  - When you visit a website, your device and browser may automatically disclose certain information (such as device type, browser application, browser settings, IP address and other technical communications information)

• Professional or employment-related information and references: Current or past job history or performance evaluation, school or degrees earned

### **Sensitive Personal Information**

The following categories of Sensitive Personal Information comprised of Personal Information that may reveal:

- Social Security, 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, password, or credentials allowing access to an account;
- Precise geolocation;
- Racial or ethnic origin, sex, religious or philosophical beliefs, or union membership;
- The contents of mail, email, and text messages unless the business is the intended recipient
- of the communication; and
- The processing of biometric information for the purpose of uniquely identifying a person.

# Categories of sources from which we collect

- From deposit and/or credit applicants and bank customers, third party service vendors, public information.
- From Credit Reporting Agencies with your authorization
- From contract or agreement
- From the specific application or software when you accessing our online or mobile banking application, our website
- From the security camera or similar devices when you visit our branches, facilities and ATMs
- Employment Information: From resume, job applicants, employees and former employers

## Our business or commercial purpose for collecting

- To provide and manage products and services. Establish and process transactions including checking accounts, loans, online banking access, customer services and everyday operations
- To qualify you for an account or credit with us
- To perform the service for our daily business.
- To qualify you for the appointed position
- To validate your identity when accessing or visiting our sites, applications, branches, facilities, and ATMs in connection with our products, service, and daily business
- To validate your identity when accessing our sites and applications
- **Employment Information**: Process employment applications. Provides benefits to employees and dependents, including health care plan and retirement plans

## Categories of third parties with whom we share

- Shared with our service providers to service your account
- Government agencies including to support regulatory and legal requirements
- Share with vendors that assist us in protecting your accounts and personal information from fraud, Identify Theft and providing security and safety for our customers and employees
- **Employment Information**: Share with service provider for employee payroll, health care and retirement plan

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#### Personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information is covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

RBB Privacy Notice and RBB Online Privacy Notice: you can access to our privacy notice and online privacy policy notice by go to our website <a href="https://www.royalbusinessbankusa.com">www.royalbusinessbankusa.com</a> under Privacy Policies & Notices webpage.

### Sale or Share of Personal Information

We **do not** sell personal information for monetary or other valuable consideration **OR** share any personal information for cross-context behavioral advertising about customers, consumers including minor under 16 years of age. During the past 12 months, Royal Business Bank has disclosed the categories of personal information listed above for its business purposes.

## **Retention of Personal Information**

The length of time that we intend to retain each category of Personal Information will depend on a number of criteria, including (i) the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain Personal Information in order to accomplish the business or commercial purpose(s) for which such Personal Information is collected, used or disclosed (as indicated in this Notice), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

# Your Rights under the CCPA

You have the following rights under the CCPA regarding your personal information.

- 1. Right to know
  - a. The categories and/or specific pieces of personal information we have collected
  - b. The categories of sources from which the personal information was collected
  - c. The purposes of collecting the personal information
  - d. The categories of third parties with we share the personal information
  - e. The categories of information that we sell or disclose to third parties
- 2. Right to delete personal information data we collected
- 3. Right to correct inaccurate personal information we collected
- 4. Right to limit uses of personal information we collected
- 5. Right not to be discriminated against for exercising any of these rights

# Right to Opt-Out of the Sale or Share of Personal Information

You do not need to request the right to opt-out of the sale or share of your personal information because we do not sell or share your personal information to third parties as defined under CCPA. We do need to collect certain personal information in order to provide banking services to you. If you do not want to provide that necessary personal information, we will not be able to provide you with our banking services.

## **Authorized Agent**

When you use an authorized agent to submit a request to know or a request to delete, request to correct, or a request to know, we may require the authorized agent to provide proof that you gave the agent signed permission to submit the request. We may also require you to verify your identity directly with us or directly confirm with us that you gave the authorized agent permission to submit the request.

# **How to Exercise Your Rights**

You may submit a request by:

- 1. Contact us at: (888) 616-8188 Monday through Friday from 9:00 AM to 5:00 PM PST;
- 2. Complete the "<u>Personal Information Request Form</u>" at our website and mail to Royal Business Bank, Attention: Risk Management Department, 1055 Wilshire Blvd., Ste 1200, Los Angeles, CA 90017 or drop it off at any of our California branch; or
- 3. Submit the online form "<u>Personal Information Request Form</u>" at our website under Privacy Policy & Notice

We are required by law to verify your identity before releasing any of your information to you.

Privacy and personal information protection laws, other than the CCPA, apply to the personal information that we collect, use, and disclose. When these laws apply, personal information may be exempt from, or outside the scope of requests. As a result, in some instances, we may decline all or part of a request related to your personal information. This means that we may not provide some or all this personal information when you make a request. Also, we may not delete some or all this personal information when you make a deletion request.

#### You can find our CCPA Notice at our website www.royalbusinessbankusa.com/privacy

#### Question

If you have any questions, you may write to us at Royal Business Bank, Attention: Risk Management Department, 1055 Wilshire Blvd., Suite 1200, Los Angeles, CA 90017 or call toll free (888) 616-8188.

Mail to Royal Business Bank, Attention: Risk Management Department, 1055 Wilshire Blvd., Ste 1200, Los Angeles, CA 90017

## **Change to This Notice**

We may change or update this Notice from time to time. When we do, we will post the revised Notice with the last updated date.