



## **California Consumer Privacy Act Disclosure**

### **Applicability**

Your privacy is important to us. This California Consumer Privacy Act Disclosure explains how Vast Bank, N.A. (“Company,” “we,” or “us”) collect, use, and disclose personal information relating to **California residents** covered by the California Consumer Privacy Act of 2018 (“CCPA”). This notice is provided pursuant to the CCPA and supplements the information contained in Company’s general Privacy Policy located at [here](#).

### **Introduction**

Under the CCPA, ‘Personal Information’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident, household, or device. The CCPA; however, does not apply to certain information, such as, information subject to the Gramm-Leach-Bliley Act (“GLBA”).

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our US Consumer Privacy Notice located at [here](#).

Keeping Personal Information 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.

### **Collection and Disclosure of Personal Information**

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

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope.

Effective: December 1, 2020

The following categories of Personal Information relating to California residents covered by this disclosure:

<b>Categories of Personal Information</b>	<b>Examples</b>	<b>Collected</b>
<b>A. Personal Identifiers</b>	May include but not limited to: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, username, Social Security Number, or other similar identifies.	Yes
<b>B. Personal Records</b>	May include but not limited to: A name, telephones number, address, signature, passport number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information	Yes
<b>C. Protected classification characteristics under California or federal law</b>	May include but not limited to: Sex, marital status, familial status, race, and gender identity, age, disability, national origin, citizenship, religion or creed, veteran, or military status	No
<b>D. Commercial Information</b>	May include but not limited to: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	No
<b>E. Biometric Information</b>	May include but not limited to: Physiological, or biological characteristics used as a form of identification and access control, such as, fingerprints, faceprints, and voiceprints	Yes
<b>F. Internet or other similar network activities</b>	May include but not limited to: Search history, information on a consumer's interaction with a website, application, or advertisement	No
<b>G. Geolocation Data</b>	May include but not limited to: Location based on IP Address	Yes

<b>H. Sensory Data</b>	May include but not limited to: Audio (voicemails), electronic, visual, or similar information	No
<b>I. Professional or Employment Related Information</b>	May include but not limited to: Professional education, or employment related information	Yes
<b>J. Non-public Education Records</b>	May include but not limited to: Education records directly related to a student maintained by an education institution, such as grades, transcripts, class lists, or student disciplinary records	No
<b>K. Inferences drawn from other personal information</b>	May include but not limited to: Profile reflecting a person's preferences, characteristics, predispositions, behavior, or attitudes	Yes

### Use of Personal Information

In the past 12 months, we have used Personal Information relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- Performing services, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Short-term, transient use where the information is not disclosed to a third-party and is not used to build a profile or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Auditing related to a current interaction and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes, or opinions)

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- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

We will provide you notice as required if we collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes.

### **Rights under the CCPA**

If you are a California resident, you have the right to:

1. Request we disclose to you, free of charge, the following information covering the 12 months preceding your request:
  - a. The categories of Personal Information about you that we collected;
  - b. The categories of sources from which the Personal Information was collected;
  - c. The purpose for collecting Personal Information about you;
  - d. The categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
  - e. The specific pieces of Personal Information we collected about you;
2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
3. Be free from unlawful discrimination for exercising your rights under the CCPA

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days to process your request, we will provide you with an explanation for the delay.

### **How to Exercise Your Rights**

If you are a California resident, you may submit a request by:

1. Completing the CCPA opt-out form located at [here](#).
2. Calling 844-825-5399

### **Changes to this California Consumer Privacy Act Disclosure**

We may change or update this Disclosure from time to time. When we do, we will post the revised Disclosure on this page with a new "Effective" date.