

**UNITED BUSINESS BANK**  
**CALIFORNIA CONSUMER PRIVACY ACT POLICY**  
**as amended by the California Privacy Rights Act**  
 Effective 01/01/2024

Pursuant to the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), certain California residents are provided with specific rights regarding the personal information that is collected about them. If applicable, you have the right to request the personal information we collect about you, the right to request the personal information we sell, share or disclose for a business purpose about you, the right to opt-out of the sale of your personal information, the right to request we delete or correct the personal information we collected about you, the right to designate an authorized agent and the right to be free of discrimination for exercising these rights, subject to applicable exemptions and exceptions.

**Your Right to Know About Personal Information Collected, Disclosed, Shared or Sold.** A consumer has the right to request that we disclose what personal information we collect, use, disclose, share and sell. If you wish to submit a verifiable consumer request for personal information we collect, use, disclose, share or sell you should:

- Call our Support Center toll-free at 1-855-476-BANK (2265) or
- Visit us online at [www.unitedbusinessbank.com](http://www.unitedbusinessbank.com) and use the [CCPA Request](#) link

In your verifiable consumer request you should include a description of your request including enough information for us to understand and respond appropriately.

Your request to us must be a verifiable request, meaning we must be able to verify your identity and that the personal information that we collected relates to you. In order to verify your identity we will identify you with information you have previously provided to us and with information about your account(s) or transactions. We may request additional information in order to verify your identity. We will respond within 45 days once we receive your request. If we need more time, we will inform you of the reason for the delay during this time period and may extend the time to respond up to an additional 45 days.

**Collection of Personal Information (PI).** Below is a list of categories of personal information we have collected about consumers in the preceding 12 months. We have also provided a list of the categories of sources from which we collect personal information from consumers. Additionally, we collect personal information about consumers for the below business or commercial purposes.

Categories of PI We Collect	Categories of Sources from Which We Collect the PI	Our Business or Commercial Purpose for Collecting the PI
<p><b>A.</b> Identifiers such as 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.</p> <p><b>B.</b> Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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 (California Civil Code § 1798.80(e)).</p> <p><b>C.</b> Characteristics of protected classifications under California or federal law.</p> <p><b>D.</b> Commercial information, including records of personal property, products or services purchased, obtained, or</p>	<ul style="list-style-type: none"> <li>•Directly from you such as when applying for or opening a deposit account or loan, or any related services;</li> <li>•Information received from credit reporting agencies;</li> <li>•Internet websites such as our Website and our Online Banking product, including social media such as LinkedIn;</li> <li>•Job application with us;</li> <li>•Government entities from which public records are obtained;</li> <li>•Consumer data resellers</li> </ul>	<ul style="list-style-type: none"> <li>•To process loan or deposit account applications;</li> <li>•To service those products and services you have with us;</li> <li>•To consider your job application for hiring and provide employee benefits;</li> <li>•Auditing, related to a current interaction with the consumer 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;</li> <li>•Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;</li> <li>•Debugging to identify and repair errors that impair existing intended functionality;</li> <li>•Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer 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;</li> <li>•Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer</li> </ul>

<p>considered, or other purchasing or consuming histories or tendencies.</p> <p><b>E.</b> Biometric information; fingerprint from non-clients cashing on-us checks.</p> <p><b>F.</b> Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p> <p><b>G.</b> Geolocation data.</p> <p><b>H.</b> Audio, electronic, visual, or similar information.</p> <p><b>I.</b> Professional or employment-related information.</p> <p><b>J.</b> Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)</p> <p><b>K.</b> Inferences drawn from any of the information identified in the CCPA to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p> <p><b>L.</b> Sensitive Personal Information defined as:</p> <ol style="list-style-type: none"> <li>1. A consumer’s social security number, driver’s license, state identification card or passport number;</li> <li>2. A consumer’s 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;</li> <li>3. A consumer’s precise geolocation;</li> <li>4. A consumer’s racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership;</li> </ol>		<p>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 on behalf of the business or service provider;</p> <ul style="list-style-type: none"> <li>•Undertaking internal research for technological development and demonstration;</li> <li>•Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business and to improve upgrade or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business;</li> <li>•To advance a person’s commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide or exchange products, goods, property, information or services or enabling or effecting, directly or indirectly, a commercial transaction;</li> <li>•Manage and document your employment with us and employment related actions;</li> <li>•Maintain your employee information in company directories;</li> <li>•Maintain emergency contact and beneficiary details</li> <li>•Administer employee engagement programs including online surveys;</li> <li>•Use corporate communication tools such as video conferencing;</li> <li>•Administer occupational safety and health programs;</li> <li>•Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, networks, communications and other assets and resources;</li> <li>•Detect security incidents and other fraudulent activity; •Investigate and respond to claims;</li> <li>•Comply with applicable laws (e.g. health and safety, employment laws);</li> <li>•Use in ways we have told you about for our business activities;</li> <li>•Administer behavioral exams;</li> <li>•Obtain access to certain Company physical structures and facilities; and</li> <li>•Manage student intern programs</li> </ul>
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**Disclosure, Sharing or Sale of Personal Information.** Below is a list of the categories of personal information we have disclosed or shared for a business purpose or sold to third parties in the preceding 12 months. For each category of personal information listed below we have also identified the categories of third parties to whom that information was sold, shared, or disclosed.

Categories of PI Disclosed, Shared or Sold for a Business Purpose	Our Business or Commercial Purpose for Disclosing, Sharing or Selling PI	Categories of Third Parties to Whom the PI was Disclosed, Shared or Sold
<ul style="list-style-type: none"> <li>•Identifiers</li> <li>•Personal Information listed in California Civil Code § 1798.80(e)</li> </ul>	<ul style="list-style-type: none"> <li>•To process loan or deposit account applications;</li> <li>•To service those products and services you have with us;</li> </ul>	<ul style="list-style-type: none"> <li>•Data analytics providers;</li> <li>•Government entities;</li> <li>•Law enforcement;</li> <li>•Operating systems and platforms</li> </ul>

<ul style="list-style-type: none"> <li>•Protected classifications under California or federal law.</li> <li>•Commercial information</li> <li>•Biometric Information</li> <li>•Internet or other electronic network activity information</li> <li>•Geolocation data</li> <li>•Audio, electronic, visual or similar information</li> <li>•Professional or employment-related information</li> </ul>	<ul style="list-style-type: none"> <li>•To consider your job application for hiring and provide employee benefits;</li> <li>•Auditing, related to a current interaction with the consumer 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;</li> <li>•Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;</li> <li>•Debugging to identify and repair errors that impair existing intended functionality;</li> <li>•Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer 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;</li> <li>•Performing services on behalf of the business or service provider, 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 on behalf of the business or service provider;</li> <li>•Undertaking internal research for technological development and demonstration;</li> <li>•Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business and to improve upgrade or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; and</li> <li>•To advance a person’s commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide or exchange products, goods, property, information or services or enabling or effecting, directly or indirectly, a commercial transaction.</li> </ul>	
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We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

**Right to Request Deletion of Personal Information.** You have the right to request the deletion of any personal information about you which we have collected, subject to applicable exceptions.

Exceptions to our deletion responsibilities include, but are not limited to, information necessary to:

- Complete the transaction for which the personal information is collected;
- Provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you;
- Perform a contract between us and you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or to prosecute those responsible for that activity;
- Debug to identify and repair errors;
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with a legal obligation;
- Otherwise use your personal information internally in a lawful manner that is compatible with the context in which you provided the personal information.

**Right to Request Correction of Inaccurate Personal Information.** You have the right to request the correction of any inaccurate personal information we have collected about you.

If you wish to submit a request to delete or correct the personal information we collected or maintain about you, you may:

- Call our Support Center toll-free at 1-855-476-BANK (2265) or
- Visit us online at [www.unitedbusinessbank.com](http://www.unitedbusinessbank.com) and use the [CCPA Request](#) link

In your verifiable consumer request you should include a description of your request including enough information for us to understand and respond appropriately.

Your request to us must be a verifiable request, meaning we must be able to verify your identity and that the personal information that we collected relates to you. In order to verify your identity we will identify you with information you have previously provided to us and with information from your account(s) or transactions. We may request additional information in order to verify your identity. We will respond within 45 days once we receive your request. If we need more time, we will inform you of the reason for the delay during this time period and may extend the time to respond up to an additional 45 days.

**Authorized Agent.** You may designate an authorized agent to make a request under the CCPA on your behalf. We retain the right to verify the legitimacy of that designation, and to identify both you and the agent. We will identify you with information you have previously provided to us and with information about your account(s) or transactions. Your authorized agent may also make a request on your behalf by:

- Calling our Support Center toll-free at 1-855-476-BANK (2265) or
- Visiting us online at [www.unitedbusinessbank.com](http://www.unitedbusinessbank.com) and using the [CCPA Request](#) link

**Right to Opt-Out of the Sale of Personal Information.** You have the right to opt-out of the sale of your personal information. However, we do not sell personal information.

**Right to Limit Use of PI.** United Business Bank does not use or disclose Sensitive PI for any purpose other than a Permissible Use as described by the CPRA.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** You have a right not to receive discriminatory treatment by us for the exercise of any privacy rights conferred by the California Consumer Privacy Act (California Civil Code § 1798.100 *et seq.*) Unless permitted by the CCPA, we will not do any of the following if you exercise any of your rights listed above:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through the use of discounts or other benefits or impose 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 of a different level or quality.

**Contact for More Information.** For questions or concerns about our CCPA Policy you should:

- Call us toll-free at 1-855-476-BANK (2265) or
- Visit us online at [www.unitedbusinessbank.com](http://www.unitedbusinessbank.com) and use the [CCPA Request](#) link

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