



CALIFORNIA CONSUMER PRIVACY ACT POLICY

This California Consumer Privacy Act Policy (“Privacy Policy”) is being provided to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and is applicable to individuals that are California residents (as defined in the CCPA). This Privacy Policy explains how we collect, use, and disclose personal information concerning California residents and explains certain rights that California residents have under the CCPA.

Personal information is information that identifies, relates to, or could reasonably be linked directly or indirectly with a California resident. The specific personal information that we collect, use, and disclose will vary based on your relationship or interactions with us. For example, we collect personal information to provide consumer and business financial products and services, for our general business purposes, and for our employment and human resource purposes. The CCPA, however, does not apply to certain information, such as information that we collect about consumers who apply for or obtain our financial products and services for personal, family, or household purposes which are subject to the Gramm-Leach-Bliley Act (“GLBA”). For information about how we collect, disclose, and secure information relating to these customers, please refer to our [GLBA Privacy Notice](#).

Collection and Disclosure of Personal Information

In the past 12 months, we have collected and disclosed to third parties for our business purposes, the following categories of personal information.

- **Identifiers.** Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name. This category includes the collection of sensitive personal information including social security number, driver’s license, state identification card, or passport number.
- **Additional Data Subject to California Civil Code Section 1798.80** such as your telephone number, signature, and physical description.
- **Characteristics** of protected classifications under California or federal law such as citizenship, age, sex, and marital status. This category includes the collection of sensitive personal information including racial or ethnic origin.
- **Commercial Information** such as products or services obtained or considered, bank information, transaction histories, and account and card numbers.
- **Biometric Information** such as fingerprints and voiceprints. This category includes the collection of sensitive personal information such as hand/palm scan, fingerprints, and facial recognition.
- **Internet or Network Activity** such as interactions with our website, mobile applications, IP address and username.
- **Geolocation Data** such as device location and IP address location.
- **Sensory Information**, audio, electronic, visual, and similar information, such as call and video recordings.
- **Professional or Employment-Related Information** such occupation and employer, income, employment history and prior employer contact information.
- **Education Information** such as school related information.
- **Inferences** based on information about an individual to create a summary about, such as an individual’s preferences and characteristics, intelligence, abilities, and aptitudes.

We collect the personal information referenced above from the following sources.

- Directly from you or an individual acting on your behalf.
- Service providers in connection with banking products and services.
- Service providers or other third parties who provide services on our behalf, such as credit agencies.
- Service providers in connection with human resource activities and workforce management.
- Government entities and other publicly available sources.
- Website/mobile app activity/social media.
- Information from client directed third parties or institutions representing a client/prospect.
- Information from business clients about individuals associated with the business (e.g., a guarantor for a business loan, authorized signer for a business account, an employee or board member).

We have disclosed each of the above-listed categories of personal information concerning California residents for our business purposes to one or more of the following categories of third parties.

- Our affiliate that may use the personal information consistent with this policy.
- Service providers to conduct day-to-day business, including to maintain or service accounts, provide customer service, process transactions and payments, verify customer information, provide online and mobile services, fraud and security monitoring and protection services, maintain websites and technology infrastructure.
- Service providers and professional services organizations who provide services on our behalf, such as auditors, accountants, and law firms.
- Service providers that provide human resource and employment related services.
- Government entities and related third parties as required to comply with laws and regulations.
- Data analytics providers.
- Operating systems and platforms.

In the past 12 months, we have used personal information concerning 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 transactions and payments, verifying customer information, providing financing, engaging in advertising or marketing, performing analytics or similar services.
- Performing business operations including vendor contract negotiations and payments.
- Auditing compliance with our policies, procedures, applicable legal and regulatory laws and regulations.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Undertaking activities to verify or maintain the quality or safety of a product or service controlled by us, and to improve, upgrade, or enhance the service.
- Debugging to identify and repair errors that impair existing or intended functionality.
- Undertaking internal research for technological development and demonstration.
- Employment related services, including evaluating job applicants, administering and servicing employment records and benefits, processing payroll, tracking time and attendance, obtaining and verifying background checks.
- Complying with laws and regulations and to comply with other legal processes and law enforcement requirements.

Personal Information Sold or Shared

In the past 12 months, we have not sold or shared, as defined in the CCPA, personal information or sensitive information, including personal or sensitive information of minors under the age of 16.

Sensitive Personal Information

We only use or disclose sensitive personal information for the following purposes consistent with the CCPA regulations.

- To provide requested products or services.
- To detect and investigate security incidents.
- To resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible.
- To ensure the physical safety of natural persons.
- To perform services including maintaining and servicing accounts, providing customer service, processing transactions and payments, verifying a California resident's information, providing financing, or providing similar services.
- To verify or maintain the quality or safety of a product or service and to improve or enhance the product or service.
- For short-term transient use.

Rights under the CCPA

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

1. Disclose to you the following information covering the 12-month period prior to your request:
 - The categories of personal information collected and the categories of sources from which we collected the personal information,
 - The business or commercial purpose for collecting the personal information,
 - The categories of third parties with whom we shared the personal information, and the categories of personal information shared,
 - The specific pieces of personal information we collected about you.
2. Delete personal information we collected from you; and
3. Correct inaccurate personal information that we maintain about you.

Please be aware that there are circumstances in which the law does not require or allow us to fulfill your request.

We will not discriminate against you because you exercised your rights under the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

To Make a Request

You may make a request by:

- Calling our toll-free number at 800-652-2871, option #7,
- Inquiring at a branch office, or
- Completing an online [Personal Information Request](#).

When you make a request, we will verify your identity using standard verification methods, utilizing information that we already have about you. We will ask you to provide verifying information, such as your name, email, postal address, and phone number. We may also ask you to certify under penalty of perjury that you are a California resident. We will review the information provided and may request additional information to ensure we are interacting with the correct individual.

Your authorized agent may also make a request on your behalf. When submitting 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.

Changes to our Privacy Policy

We may change or update our Privacy Policy from time to time. When we do, we will post the updated Privacy Policy to our website.

Contact for More Information

If you have any questions or concerns about our privacy practices or this Privacy Policy, you may call us at (951) 766-4100 or write us at HCN Bank, Client Services, P.O. Box 12002, Hemet, CA 92546-8002.

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