

California Consumer Privacy Notice at Collection

(Customer and General Business Notice)

This Notice at Collection ("Notice") is provided as required by the California Consumer Privacy Act ("CCPA") and applies to individuals that are California residents as defined in the CCPA.

Personal Information, under the CCPA, 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. We generally collect personal information to provide consumer and business financial products and services and other general business purposes. The CCPA 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, which is governed by our Consumer Privacy Policy found at: https://www.hcnbank.com/Privacy-Notice.

We collect any or all of 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. This category includes the collection of sensitive personal information including racial or ethnic origin.
- **Commercial Information** such as products or services obtained or considered, account and debit card numbers, and transaction histories.
- **Biometric Information**, including the collection of sensitive personal information such as fingerprint and facial recognition.
- Internet or Online Information 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.
- Education Information such as school related information.
- Inferences. Inferences based on information about an individual to create a summary about, such as an individual's preferences and characteristics.

We use or disclose the personal information we collect for one or more of the following purposes.

- Performing services, including offering financial products and services, 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.
- Auditing compliance with our policies and procedures or 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 such product or service.
- Debugging to identify and repair errors that impair existing or intended functionality.
- Undertaking internal research for technological development and demonstration.

• Complying with laws and regulations and to comply with other legal processes and law enforcement requirements.

In the ordinary course of business, we collect and use sensitive personal information such as social security numbers, driver's license, state identification numbers and passport numbers, racial or ethnic origin, and fingerprint or facial recognition data. This sensitive information is used to verify identity, authenticate use of our products and services, for government reporting, and to detect and prevent fraud and security incidents.

We do not sell or share (as defined in the CCPA) any personal information. We retain this data until the relationship with the individual ceases, after which it is retained only to the extent required by applicable law or for purposes of preventing fraud.

We may update this Notice from time to time, in which case the revised Notice will be posted to our website or provided upon request. For more information or for information about rights that California residents have under the CCPA, please see our California Consumer Privacy Act Policy at <u>https://www.hcnbank.com/California-Consumer-Privacy</u>

Dated January 1, 2023