

Avidbank California Consumer Privacy Act Notice and Policy

(Last updated: January 1, 2020)

This Notice explains how we collect, use, and disclose personal information about California residents. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act ("CCPA"). This Notice explains how California residents can exercise their rights under the CCPA which include:

- The right to know what personal information is being collected about them.
- The right to know whether their personal information is sold or disclosed and to whom.
- The right to say no to the sale of personal information (Avidbank does not sell personal information).
- The right to access their personal information.
- The right to equal service and price, even if they exercise their privacy rights.

The CCPA applies only to personal information about residents of California that is not collected and maintained in order to provide a financial product or service. Under the CCPA, "personal information" is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. This information is referred to in this Notice as "Personal Data."

Categories of Personal Data that We Collect and Disclose; We Do Not Sell Personal Data

We collect and disclose Personal Data to provide individual and commercial financial products and services and also for employment and human resource purposes. The Personal Data that we collect, use, or disclose about a specific California resident will depend on our relationship or interaction with that individual. During the past 12 months, we have collected the following categories of Personal Data:

- Personal unique identifiers, such as full name and federal or state issued identification numbers including Social Security number, driver's license number, and passport number
- Personal information, including contact details such as telephone number and address, financial information such as account number and balance, and payment card details including debit card numbers
- Financial information, such as products and services obtained and transaction histories
- Biometric information, such as fingerprints
- Geolocation data
- Professional or employment-related information
- During the past 12 months, we have also disclosed the categories of Personal Data listed above for our business purposes. ***We have not sold Personal Data and it is our policy not to sell any client personal information.***

Why We Collect Personal Data and How We Use It

The below lists the purposes for which we collect and use Personal Data in order to provide and manage products and services:

- Establish and process transactions for our products and services including checking accounts, debit cards, loans, as well as additional products for businesses such as commercial financing
- Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, client service, payments and collections, and account notifications
- Support everyday operations, including meeting risk, legal and compliance requirements
- Perform accounting, monitoring, and reporting
- Support audit and investigations, legal requests and demands
- Enable the use of service providers for business purposes
- Comply with policies and procedures

Sources of Personal Data

The information below lists the categories of sources from which we collect Personal Data:

- From California residents directly, or other individuals acting on their behalf, through physical (e.g., paper application), audible (e.g., phone), or electronic (e.g., email) sources.
- Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, or local government entities.
- Outside companies or organizations that provide data to support activities such as fraud prevention and underwriting.
- Outside companies or organizations from whom we collect personal data as part of providing products and services, completing transactions, supporting our everyday operations or business management.

Categories of Third Parties with Whom We Share Personal Data

The categories of third parties with whom we share Personal Data depend on our relationship or interaction with a specific California resident. The information below lists the categories of third parties with whom we share Personal Data.

- Outside companies or organizations with whom we share Personal Data as part of providing products and services, completing transactions, or supporting our everyday operations.
- Government agencies including to support regulatory and legal requirements.

Requests Under the CCPA

If you are a California resident, you have the right to request any of the below items where information was collected covering the 12-month period prior to your request, for a purpose other than providing a financial product or service:

- The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
- The business or commercial purpose for collecting Personal Data about you;
- The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
- The specific pieces of Personal Data we collected about you; and
- Deletion of the Personal Data we collected from you (“Deletion Request”).

If you are a California resident, a business may not discriminate against you for exercising your rights under the CCPA.

Responding to Requests

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we collect, use, and disclose. When these laws apply, Personal Data may be exempt from, or outside the scope of, Access Requests and Deletion Requests. As a result, in some instances, we may decline all or part of an Access Request or Deletion Request related to this Personal Data. This means that we may not provide some or all of this Personal Data when you make an Access Request. Also, we may not delete some or all of this Personal Data when you make a Deletion Request.

As examples, our processing of or response to an Access Request or Deletion Request may not include some or all of the following Personal Data:

Consumer Accounts. Personal Data connected with consumer accounts used for personal, family, or household purposes.

Business-to-Business Relationships. Personal Data we collect in the course of providing a product or service, or in the course of receiving a product or service.

How to Make Requests

If you are a California resident, you can make an Access Request or a Deletion Request by:

- Contacting us at 866-604-0292 or 650-843-2200;
- Submitting your request by mail:
Avidbank
Attn: CCPA Request
P.O. Box 1730
Palo Alto, CA 94302; or
- Submitting a request online: <https://www.avidbank.com/request-know>