



## CALIFORNIA CONSUMER PRIVACY ACT NOTICE

**Effective Date: January 1, 2020**

### INTRODUCTION

At Beneficial State Bank (“we” or “our”) protecting the privacy of personal information of individuals is important to us. This California Consumer Privacy Act Notice (“CCPA Disclosure”) supplements the information contained in any other Privacy Policy or Notice provided by Beneficial State Bank and applies solely to residents of the State of California (“consumers” or “you”). It describes our practices both online and offline to comply with the California Consumer Privacy Act of 2018 (“CCPA”) regarding the collection, use, disclosure and sale of personal information and the rights of California residents (“consumers” or “You”) regarding their own personal information. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended. Any terms defined in the CCPA have the same meaning when we use them in this notice.

As defined in 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 relating to a consumer will vary depending on our relationship or interaction with that individual.

### Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as:
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA)
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA)

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.

### PERSONAL INFORMATION WE COLLECT

In order to offer you the financial products and services you seek, we may collect, maintain, and use personal information from the following categories:

- Identifiers such as name and government issued identifier (e.g., Social Security Number, 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.
- Personal information as defined in the California safeguards law, such as contact information and financial information.

- Characteristics of protected classifications under California or federal law such as gender and race.
- Commercial information, such as transaction information and purchase history.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with a website, application, or advertisement.
- Geolocation data such as device location and Internet Protocol (IP) location. We use non-identifiable data such as, your IP address to help diagnose problems with our server, and for statistical metrics used to track website visitor traffic.
- Sensory data such as audio, electronic, visual or similar information.
- Professional or employment-related information, such as work history and prior employer.
- Education information.

**We obtain the personal information above from the following sources:**

- Directly or indirectly from you or your person representative.
- Public Record Sources (Federal, State or Local Government Sources)
- Website/Mobile App Activity/Social Media
- Service Providers, such as credit bureaus and other third parties that interact with us in connection with the products and services we provide.

**USE OF PERSONAL INFORMATION**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information was provided. For example, if you provide your personal information to obtain a product or service, we will use that information to process your request.
- To create, maintain, customize, and secure your account with us.
- To provide, support, and to personalize and develop our websites products and services.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To detect security incidents, and protect against malicious, deceptive, fraudulent, or illegal 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, presentation of content related to site content the visitor has interacted with during a given web session.
- To comply with laws and regulations and to comply with other legal process and law enforcement requirements.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

**SHARING PERSONAL INFORMATION**

We may share your personal information with third parties for business purposes. When we share personal information, we enter a contract with the third party or service provider that describes the purpose of the shared information and requires the recipient to keep it confidential, ensure its protection, and to prohibit its use for any purpose except as required to perform the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Third Parties to whom you authorize us, directly or indirectly, to disclose your personal information in connection to products or services we provide to you.
- Government or regulatory authorities.

### **SALE OF PERSONAL INFORMATION**

In the past 12 months, we have not “sold” Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Disclosure, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

### **YOUR RIGHTS UNDER THE CCPA**

The CCPA provides you with specific rights regarding your personal information.

#### *Access to Specific Information*

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months and to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months.

Once we receive and confirm a verifiable request, we will disclose to you free of charge:

- The categories of Personal Information about you that we collected.
- The categories of sources from which the Personal Information was collected.
- The business or commercial purpose for collecting Personal Information about you.
- The categories of third parties with whom we shared Personal Information about you.
- The categories of Personal Information that was disclosed or shared with a third party for a business purpose.
- The specific pieces of Personal Information we collected about you.

#### *Deletion Rights*

You have the right to request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and

Be free from unlawful discrimination for exercising your rights under the CCPA.

### **Response Timing**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will cover the 12-month period preceding receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

### **Right to Opt-Out of the Sale of Personal Information**

You have the right to opt-out of the sale of their personal information. As stated above, we do not and will not, sell the personal information of consumers to third parties.

### **NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you products or services.
- Charge you different fees or rates for products or services, including through granting discounts

or other benefits, or imposing penalties.

- Provide you a different level or quality of products or services.
- Suggest that you may receive a different fee or rate for products or services or a different level or quality of products or services.

### **PRIVACY NOTICES CHANGES**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice we will notify you through a notice on our website homepage.

### **CONTACT INFORMATION**

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: [privacy@beneficialstate.com](mailto:privacy@beneficialstate.com)

Phone: 888-326-2265

Mail: Beneficial State Bank  
1438 Webster Street  
Suite 100  
Oakland, CA 94612

