

## CALIFORNIA CONSUMER PRIVACY ACT NOTICE

Effective Date: January 2024

### 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)
  - Information we collect of job applicants, employees, contractors, temporary employees, directors, and shareholders

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, 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 our 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.
- Subscription preferences, as set by the user, to track which types of communications you want to receive.

**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 and customer profile.
- 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.

**How Long We Retain Your Personal Information**

Based on contractual requirements and/or legal requirements, personal information is maintained for a specified period of time, as required by legal, regulatory, or industry requirements. Additional information such as emails and vendor agreements are maintained for business purposes for an indefinite amount of time.

**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.

### **Employees/ Former Employees/Applicants**

If you are an employee, former employee, owner, officer, director, or job applicant with Beneficial State Bank, please visit our California Employee Privacy Policy for information on your rights and how to exercise those rights. This information was previously provided to you in relation to your employment or application for employment.

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 California residents with specific rights regarding their personal information - the Right to Know, the Right to Delete, the Right to Correct, the Right to Limit use of Sensitive Personal Information, the Right to Opt-Out of the Sale of Personal Information or Sharing of Personal Information, and the Right to Non-Discrimination. This section describes your CCPA rights and explains how to exercise those rights, if applicable.

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.

Only you or your authorized agent may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

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. Once we receive and verify your request, we will delete, de-identify, or aggregate your personal information (and direct our service providers to do the same), unless an exception applies.

We may deny your Request to Delete if retaining the personal information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- Comply with a legal obligation.

Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Additionally, we may deny your Request to Delete if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under FCRA, GLBA, CalFIPA, or DPPA.

#### **Right to Correct:**

You have the right to request that we correct your personal information if it is inaccurate (Right to Correct). Once we verify your identity and confirm that your personal information is inaccurate, we will correct your personal information (and direct our service providers to do the same).

We may deny your Request to Correct if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under FCRA, GLBA, CalFIPA, or DPPA.

#### **Right to Limit the Use of Sensitive Personal Information:**

You have the right to direct a business that collects your sensitive personal information to limit its use to uses which are necessary to perform the services or provide the goods reasonably expected. However, we only use Sensitive Personal Information as exempt from the CCPA; to provide the goods and services requested by you; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for such actions; to ensure people's



physical safety; to perform services on our behalf; to verify or maintain the quality or safety of our products, services, and devices.

### **Right to Opt-Out and How to Submit a Request to Opt-Out**

The CCPA gives consumers the right to opt-out of 1) the sale of their personal information, 2) the sharing of their personal information for cross-context behavior advertising, or 3) for use in automated decision making.

### **Sale of Personal Information**

We do not sell your personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

### **Sharing Information for Cross-Contextual Behavioral Advertising**

We do not share your personal information. Our site is not intended for or directed to minors. We do not knowingly share the personal information of minors under 16 years of age.

### **Automated Decision Making**

The CCPA gives consumers the right to opt-out of the use of automated decision-making technology in connection with decisions about the consumer's work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. However, we do not use automated decision-making technology for personal information that is not covered by FCRA, GLBA, and CalFIPA.

### **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.

### **SUBMITTING A REQUEST TO KNOW, REQUEST TO DELETE, REQUEST TO CORRECT**

**How to submit a request:**



To make a Request to Know, Request to Delete or Request to Correct, please contact us by either:

- Calling us at: (888) 326-2265
- Email us at: [privacy@beneficialstate.com](mailto:privacy@beneficialstate.com)
- Contacting us at:

Beneficial State Bank  
Attn: Privacy Officer  
1438 Webster Street, Suite 100  
Oakland, CA 94612

- Submitting a request in person at any of our branch locations.
  - Only 1) you or 2) a person authorized by you to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a request on behalf of your minor child.

You may only make a Request to Know twice within a 12-month period.

A Request to Know, Request to Delete, or Request to Correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- If you are submitting a Request to Know specific pieces of personal information, you will need to submit a declaration under the penalty of perjury confirming you are only correcting information about yourself.

### **Authorized Agents**

Before we can respond to a Request to Know, Request to Delete, or Request to Correct submitted by an authorized agent, we need to verify not only that person or entity's authority to act on your behalf but also verify the identity of the authorized agent.

If you are authorized to submit a request on behalf of a California resident, please email us at: [privacy@beneficialstate.com](mailto:privacy@beneficialstate.com) and provide the following information:

1. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:
  - Written permission from the California resident, or
  - A valid power of attorney
2. To verify your identity, please attach copies of the following to your request email:
  - Valid Government Issued ID (not expired) AND
  - A utility bill, bank statement, or similar documentation to verify your name and address.
3. To verify the identity of the consumer for whom you are submitting the request, please attach the following with your request email:
  - Name,
  - Address,
  - Date of Birth,
  - Email Address,



- Phone Number, and
- Last 4 of the Social Security Number or last 4 of the account number

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a request to verify the requestor's identity or authority to make the request.

### **Response Timing and Delivery Method**

We will acknowledge receipt of your request within 10 business days of its receipt. We will respond to a 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. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **SOCIAL MEDIA**

We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about disclosing your information through those platforms and networks with us.

### **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