

**PINNACLE BANK**  
**CALIFORNIA CONSUMER PRIVACY ACT POLICY**  
**As of 01/01/2022**

Under the California Consumer Privacy Act (CCPA), certain California residents are provided with specific rights regarding the personal information that is collected, used, disclosed, or sold about them. If applicable, you have the right to request the personal information we collect about you, the right to request the personal information (PI) we sell or disclose for a business purpose about you, the right to opt-out of the sale of your personal information, the right to request we delete the personal information we collect about you, the right to designate an authorized agent and the right to be free of discrimination for exercising these rights, subject to applicable exemptions and exceptions.

***Your Rights Regarding Your Personal Information***

**(1) Right to Know About Personal Information Collected.** You have the right to request that we disclose the personal information we collect and use about you.

**PERSONAL INFORMATION COLLECTED**

**Personal Information We Collect.** Below is a list of categories of personal information we have collected about consumers in the preceding 12 months:

- Identifiers, such as name and federal or state issued identification numbers including Social Security number, driver's license number, and passport number
- Personal information, such as telephone number, address, account number and balance, or signature
- Characteristics of protected classes or groups under state or federal law, such as sex or marital status
- Commercial information, such as records of personal property, products and services obtained, and purchasing histories
- Biometric information, such as fingerprints and voice recordings
- Internet or online information such as browsing history and information regarding interaction with websites, applications, or advertisements
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information
- Inferences drawn from any of the information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

**Categories of Sources.** We collect your personal information from the following type of people or entities:

- Direct from the consumer
- Internet service providers
- Government entities
- Operating systems and platforms
- Social networks
- Service Providers, Customer Data Resellers, Website/Mobile App Activity/Social Media, Public Record Sources

We may use the personal information we collect for the following business or commercial **purposes**:

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 or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services.
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions)

**(2) Disclosure or Sale of Personal Information.** Below is a list of the categories of personal information we have disclosed for a business purpose in the preceding 12 months. For each category of personal information listed below we have also identified the categories of third parties to whom that information was disclosed to. Pinnacle Bank does not sell Personal Information.

<b>Categories of PI Disclosed for a Business Purpose to Third Parties</b>	<b>Categories of Third Parties to Whom the PI was Disclosed to</b>
<ul style="list-style-type: none"> <li>• Identifiers</li> <li>• Personal information</li> <li>• Characteristics of protected classes or groups under state or federal law, such as sex or marital status</li> <li>• Commercial information</li> <li>• Biometric information</li> <li>• Geolocation data</li> <li>• Audio, electronic, visual, thermal, olfactory, or similar information</li> <li>• Professional or employment-related information</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers</li> <li>• Government entities</li> <li>• Law enforcement</li> <li>• Operating systems, service providers and platforms</li> </ul>

We do not we sell personal information including the Personal Information of minors under 16 years of age.

**(3) Deletion of Personal Information.** You have the right to request us to delete any personal information that we have collected about you. Subject to certain exceptions, we will delete the personal information that we have collected about you from our records, and we will direct any service provider to delete your personal information from their records.

**(4) Right to Opt-Out.** You have the right to opt-out of the sale of your personal information to third parties at any time; however, we do not currently sell your personal information.

**(5) Non-Discrimination.** We will not discriminate against you for exercising any of these rights. Unless permitted by the CCPA, we will not do any of the following if you exercise any of your rights listed above:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through the use of discounts or other benefits or impose penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services of a different level or quality.

**(6) Authorized Agent.** You may designate an authorized agent to make a request under the CCPA on your behalf. We retain the right to verify the legitimacy of that designation, and to identify both you and the agent. We will identify you with information you have previously provided to us and with information about your account(s) or transactions. Your authorized agent may also make a request on your behalf by:

- Calling our Compliance Officer toll-free at: (888) 485-7050
- Mailing a request to: Pinnacle Bank Attn: Compliance 18181 Butterfield Blvd., Ste. 135, Morgan Hill, CA 95037

### *How to Submit A Request Regarding Your Personal Information*

You can submit a verifiable request to us to exercise your right to know personal information a business collects or uses and the right to delete personal information collected by the business. Your request to us must be a verifiable request, meaning that we must be able to verify your identity and that the personal information that we collect relates to you. We will confirm that we received your request within 10 business days, and we will provide you with information on how we will process your request. We will respond to your request within 45 calendar days once we receive your request.

In your verifiable consumer request you should include a description of your request including enough information for us to understand and respond appropriately.

If we cannot verify your identity within the described time period, we may deny your request. If we need more time, we will inform you of the reason for the delay during this time period and may extend the time to respond up to an additional 45 calendar days.

The process we will use to verify your request to know the personal information collected or used about you and your request to delete the personal information is to identify you with information that you have previously provided to us and with information from account(s) or transactions. We may request additional information in order to identify your identity.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity.

For individuals submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom the request is made.

For a company or organization submitting a request on behalf of another person, we may require proof of authorization from the individual such as a power of attorney and verification of identity directly from the person for whom the request is made.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights or is required under other prevailing rules.

We will advise you in our response if we are not able to honor your request. We will not provide Social Security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

**Request to Know.** You may submit a verifiable request to know the personal information we collected, used, disclosed, or sold by:

- Calling our Compliance Officer toll-free at (888) 485-7050.
- Mailing a request to: Pinnacle Bank Attn: Compliance 18181 Butterfield Blvd., Ste. 135, Morgan Hill, CA 95037

**Request to Delete.** You may submit a verifiable request to delete the personal information we collected by:

- Calling our Compliance Officer toll-free at: (888) 485-7050
- Mailing a request to: Pinnacle Bank Attn: Compliance 18181 Butterfield Blvd., Ste. 135, Morgan Hill, CA 95037

#### ***Contact For More Information***

For more information about our privacy policies and practices, you can contact us by calling our toll-free Phone Number: (888) 485-7050.