
Department:

Compliance

Policy For:

California Consumer
Privacy Act Website
Policy

Board Approved:

March 30, 2020

Prior Approval Date:

N/A



California Consumer Privacy Act (CCPA) Website Policy

The California Consumer Privacy Act (CCPA) which became effective January 1, 2020, creates new consumer rights relating to the access to, deletion of, and sharing of personal information that is collected by businesses. Summit State Bank adopts this CCPA Policy for California Residents to comply with the California Consumer Privacy Act of 2018.

CCPA permits consumers, who are California residents, to (a) ask a covered business which categories and pieces of personal information it collects and how the information is used; (b) request deletion of the information; and (c) opt-out of the sale of such information, if applicable.

DEFINITIONS UNDER CCPA

- **Consumer** is every individual in California for other than a temporary or transitory purpose, and every individual who is domiciled in California who is outside the State for a temporary or transitory purpose.
- **Personal information** is any information that “identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” This definition includes not only common identifiers, such as a name, address, and social security number, but other information such as purchasing history or tendencies, biometric information, internet activity, geolocation data, employment information, and education information, among other things.

These provisions of the CCPA do not apply to personal information collected, processed, sold, shared, or disclosed by financial institutions pursuant to federal law as it pertains to the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (CFIPA) and implementing regulations.

CONSUMER RIGHTS UNDER CCPA

- The right to know what personal information is collected, used, shared, or sold, both as to the categories and specific pieces of personal information.
- The right to delete personal information held by businesses and by extension, a business's service provider.
- The right to opt-out of sale of personal information. Consumers can direct a business that sells personal information to stop selling that information. Children under the age of 16 must provide opt in consent, with a parent or guardian consenting for children under 13. **SUMMIT STATE BANK DOES NOT SELL PERSONAL INFORMATION.**
- The right to non-discrimination in terms of price or service when a consumer exercises a privacy right under CCPA.

If you are a California resident you have the right to request, twice in a 12-month period, the personal information we have collected, used and disclosed about you during the past 12 months.

PERSONAL INFORMATION WE COLLECT

We have collected, and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

- Identifiers, such as name and government-issued identifier (e.g., Social Security Number)
- 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 sex and marital status
- Commercial information, such as transaction information and purchase history
- Internet or network activity information, such as browsing history and interactions with our website
- Geolocation data, such as device location and Internet Protocol location
- Audio, electronic, visual and similar information, such as call and video recordings
- Professional or employment-related information, such as work history and prior employer

The categories of sources from whom we collected this Personal Information are:

- Directly from you or an authorized agent or family member
- Service Providers and other third parties (e.g., credit bureaus or mortgage brokers)
- Directly and indirectly from activity on our Website, Mobile App, or Social Networks
- Government Agencies and other publicly available sources

SHARING PERSONAL INFORMATION

The categories of third parties to whom we disclosed Personal Information for our business purposes described in this CCPA policy are:

- Vendors and Service Providers who provide services such as website hosting, data analysis, payment and transaction processing, check order fulfillment, customer service, email delivery, auditing, and marketing.
- Third Parties who provide services such as online/mobile banking, banking infrastructure, data storage, outside legal counsel, tax advisors, appraisers, and others supporting the delivery of the bank's products and services to our customers and prospects.

SALE OF PERSONAL INFORMATION

Summit State Bank does **not** sell Personal Information subject to the CCPA.

SUBMIT A REQUEST

To make a request for information:

- Call (707) 284-5750
- Email CCPArequests@summitstatebank.com
- Visit any of our locations

Summit State Bank will acknowledge receipt of your request. Upon verification of your identity, responses to your request will be made within 45 days. If additional time is required, we will inform you of the reason and extension period in writing (not to exceed more than 90 total days from receipt of original request).