

## Online Privacy Policy

Please read this Privacy Policy before using our Services. It explains how Pacific Western Bank and its legal affiliates except for Civic Financial Services, LLC (“Company”, “we” or “us”), collect, share, use, and protect personal information and data we receive through our business activities, website, mobile applications, and other online services and communication channels, including via email, telephone, or our branches (collectively, the “Services”). “You” and “your” refer to any person who accesses or uses the Services. By using the Services, you agree to be bound and abide by our Terms of Use and Online Privacy Policy in effect at the time of use. Do not access or use the Services if you do not agree with these terms.

**Please keep in mind that if you have a financial product or service with us, we will also use and share any information that we collect from or about you consistent with our Consumer Privacy Notice posted [here](#), which offers you certain choices with respect to the use and sharing of your personal information. The Consumer Privacy Notice shall supersede this Online Privacy Policy in the event of any conflict.**

We may change this Online Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new “effective date” date at the bottom of this Online Privacy Policy. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise.

By using the Services, you represent and warrant that you are of legal age to form a binding contract with Company and meet all of the eligibility requirements in these terms. The Services are intended only for individuals who are at least 13 years old and we do not knowingly collect personal information from children under 13 without parental consent or share such information with third parties.

### 1. CATEGORIES OF INFORMATION WE COLLECT

We may collect the categories of information from you described below while using our Services and where we believe it is reasonably required for ordinary business purposes.

Note that if you provide us with information regarding one or more other individual(s), you represent that you have their consent to give us their information and to permit us to use their information in accordance with this Online Privacy Policy.

#### 1.1. Customer Banking Activities

- 1.1.1. Personal information you or our banking customer voluntarily provides: This includes a username and password, contact information (such as name, email address, mailing address, telephone number) and financial account information. We may also collect payment card information, social security numbers, and driver’s license numbers (or comparable) that you or our banking customer (e.g., your business) provide where we believe it is

reasonably required for ordinary business purposes such as user authentication.

- 1.1.2. Communications: We also receive information you may provide through the Services (e.g., feedback, inquiries, etc.) and communications between you and us, such as calls, chats, emails or messages regarding the Services. *Note that telephone calls to our customer service center may be recorded or monitored for quality assurance purposes.*
- 1.1.3. Transactional information associated with banking and other financial products and services we provide to you: This includes information relating to account management, deposits, withdrawals and other financing and lending activities.
- 1.1.4. Information received from external sources: We may receive personal information about you from additional online and offline sources and external sources (e.g., credit reporting agencies, and title companies) to supplement the information we receive from you.
- 1.1.5. Mobile Activity: When you use our mobile application or otherwise use a mobile device to connect to our Services, we may collect a unique device identifier or other device information to provide the Services and/or functionality. Certain Services may require your mobile phone number, which we may associate with your account and device. Depending on your device settings, we may also collect, use and store information about your location (e.g., GPS and cell tower information). Your personal information and mobile device information (e.g., location and device identifier) may be used for security and user authentication purposes.

All of the above information is collectively referred to as “Customer Banking Activities.”

## 1.2. **Job Applicants**

- 1.2.1. Information you give us. We may collect certain information from and about you in order to evaluate and process your application. This information may include: contact information (such as name, telephone number, physical address, email, and other contact details); previous work experience, education, skills, and other qualifications; professional and other work-related licenses, permits, and certifications; work authorization status; information relating to references; information from social media or professional sites (e.g., that is publically available or if you include a link in your application materials); and any other information you elect to provide to us.

We may also ask you to provide certain information that we use to further our goal of maintaining a diverse workforce, or to comply with laws, such as information about your race, ethnicity, gender, veteran status, or whether

you have a disability. As described in the application process, you are not required to provide this information.

- 1.2.2. Information received from external sources. We may obtain information about you from platforms used to collect application information, recruiters, references, and former employers. We may use background check services to collect additional information, subject to your consent, which we will request during the process of evaluating your application.

If you submit an application through a third-party job posting services, please be advised that we do not control the privacy practices of these services. Please review their privacy policies carefully prior to providing application information.

- 1.3. **Business Contacts.** This section describes our practices when you interact with the Company as an employee, representative, or agent of a vendor, service provider, contractor of the Company, or other non-customer business entity that interacts with us. Our disclosure covers information that may be collected about you, and not about the business on whose behalf you interact with us.

- 1.3.1. Information you give us. You may provide us with your full name, title, business email address, office location, phone number, and other work contact information, in the context of your role as an employee or other representative of a service provider or contractor of the Company.

- 1.3.2. Information received from external sources. We may obtain your business contact information, and other such information relevant to your role, from the business you represent.

- 1.4. **Online User Activity.** We also collect certain information from Customers, Job Applicants and Business Contacts referred to as “Online User Activity.” We use third-party analytics tools to help us measure traffic, usage, and other trends by your use of our Services. We may also use third-party cookies, web beacons or other similar technologies to collect and store other information about your visit to, or use of, our Services. These tools may capture:

- 1.4.1. Usage Details about your interaction with our Services (such as the date, time, and length of visits, and specific pages or content accessed during the visits, search terms, frequency of the visits, and referring website addresses).

- 1.4.2. Device Information including the IP address and other details of a device that you use to connect with our Services (such as device type and unique device identifier, operating system, browser type, mobile network information, and the device's telephone number).

- 1.4.3. Location information where you choose to provide the website with access to information about your device's location.
- 1.4.4. Site usage and session information. We collect information about your interaction with the Services, including the resources that you access, pages viewed, how much time you spent on a page, and how you reached our website. We also log the details of your visits to our website and information generated in the course of using our website, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your actions on our website.

If you do not want information collected through the use of cookies, most browsers allow you to reject cookies, although it can impact your ability to use the functionality or features provided by the Services. *You may also turn off the tracking cookies used on our website by clicking on the "Do Not Sell or Share My Personal Information" link at the bottom of our homepage.*

## 2. HOW WE USE YOUR INFORMATION

- 2.1. **Essential Purposes**. We may use information we collect as we believe to be necessary or appropriate for certain essential purposes, including:
  - 2.1.1. To comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our Company policies;
  - 2.1.2. To detect, prevent, or investigate fraud, suspicious or other illegal activities;
  - 2.1.3. To enforce our Terms of Use and other legal terms;
  - 2.1.4. To protect our rights, privacy, safety or property, operations, security and/or that of our affiliates, business partners, you or others; and
  - 2.1.5. To allow us to pursue available remedies or limit the damages that we may sustain.
  - 2.1.6. Note that we may also aggregate data we collect on an anonymous basis that does not identify you for any purpose otherwise allowed by applicable law, such as for research, analysis, modeling, marketing, and advertising, as well as improvement of our Services.
- 2.2. **Customer Banking Activity** may additionally be used for the following business purposes:
  - 2.2.1. Process account applications and transactions, and facilitate other account activities;

- 2.2.2. Verify your identity (such as when you access account information or conduct transactions) and enhance our physical and online security measures and prevent fraud;
- 2.2.3. Help you efficiently access and manage your information and preferences;
- 2.2.4. Provide you with customer support;
- 2.2.5. Operate and improve our business and operations, including internal administration, auditing and troubleshooting for our Services;
- 2.2.6. Provide personalized content and information, which could include customized services for you, or offers of various products or services that you may be interested in;
- 2.2.7. Monitor metrics such as total number of visitors, traffic, and demographic patterns; and
- 2.2.8. Provide, improve, test, and monitor the effectiveness of the Services, diagnose and fix technology issues, and develop and test new products and features.

2.3. **Job Applicant** information may also be used for the following purposes:

- 2.3.1. To recruit qualified applicants and to process applications submitted to us.

2.4. **Business Contacts** information may also be used for the following purposes:

- 2.4.1. To operate and improve our business and operations, and provide Services to our customers.

2.5. **Online User Activity** collected via cookies may be used to further the various business purposes described in this Section. In particular, information collected via cookies is used to understand our customer base, advertise our Services to you and other prospective consumers, monitor the performance of our Services, improve the user experience, and to ensure the security of our Services.

### 3. HOW WE DISCLOSE PERSONAL INFORMATION

3.1. We may disclose personal information, for the business purposes noted above, to the following categories of entities:

- 3.1.1. Our legal affiliates.
- 3.1.2. Our service providers and contractors who provide technology, business, professional or other such services to us (such as website hosting, data analysis, payment processing, order fulfillment, information technology and

related infrastructure, customer service, email delivery, auditing, market research activities, event management, and real estate management).

- 3.1.3. Other service providers and contractors who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, real estate expertise, and notaries and auditors, who support the Company and our provision of Services to customers and prospective customers.
- 3.1.4. External parties or their affiliates in the event of, or negotiation of, a business transfer, merger, sale, or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- 3.1.5. To external parties (including government agencies), to comply with legal requirements, including, but not limited to, regulatory, court, and law enforcement demands (e.g., subpoenas, court orders, etc.); to prevent and address fraud, security or technical issues; and to respond to an emergency or otherwise to protect the rights, property or security of our Company, customers or third parties.

3.2. **Customer Banking Activity** may also be shared with:

- 3.2.1. Our service providers, contractors, and other businesses that assist us in providing and promoting our banking products and services to our customers, such as consumer reporting agencies, and title and appraisal companies.
- 3.2.2. Third parties that collect information through our online services in order to provide marketing services to us, including to target advertising to current and prospective customers.
- 3.2.3. Other persons or entities with which you may use or direct us to intentionally interact or to which you may use or direct us to intentionally disclose your personal information.
- 3.2.4. Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our Consumer Privacy Notice and applicable law.

3.3. **Job Applicant Information** may also be shared with:

- 3.3.1. Your references, as appropriate.
- 3.3.2. Our service providers that we believe need the information to perform recruiting and related business functions for us, but we only provide information so these individuals or entities can perform their required functions on our behalf.

3.4. **Business Contact Information** may also be shared with:

3.4.1. Your employer (who is generally a service provider or contractor to the Company).

3.4.2. Our service providers that we believe need the information to perform a technology, business, professional, or other similar functions for us, but we only provide information so these individuals or entities can perform their required functions on our behalf.

3.5. **Online User Activity** collected by third parties about your visit to, or use of, our Services could potentially be used by those parties for their own purposes, some of whom may be able to associate such information with you based on other information they have collected independently (not from us). See Section 6.2 for information on how to opt-out of cookies.

#### 4. HOW WE STORE YOUR INFORMATION

By registering for and using the Services you consent to the transfer and use of your personal information anywhere where the Services or our service providers maintain facilities, consistent with this Online Privacy Policy. We keep personal information at least as long as necessary for business purposes, our retention policy, and legal requirements. Although we implement commercially-reasonable administrative, physical and technical security measures designed to protect your personal information from unauthorized access or use, we cannot guarantee that the information will not be accessed, disclosed, altered, or destroyed. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your personal information. To the extent the law of your jurisdiction allows for notification of a security or privacy incident via e-mail or the Services, you agree to accept notice in that form.

Please note that information you send to us electronically may not be fully secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (e.g., your Social Security number) to us.

#### 5. CALIFORNIA NOTICE OF COLLECTION

Most of the information we collect about you is financial information or information collected in the context of our relationship as your financial institution. As such, this information generally is not subject to state consumer privacy laws. However, in certain circumstances, we may collect information that is outside the context of our financial relationship. In particular, if you are a California resident, you have certain rights under the California Consumer Privacy Act (CCPA), and to the extent that we collect personal information subject to the CCPA, that information and our practices are described below.

A few things to note when reading the below:

- The categories we use to describe personal information are those enumerated in the CCPA. Certain personal information may fall into multiple categories. Categories listed in the CCPA and not discussed here are either not collected or financial or other information not within scope of the CCPA.
- We are required to list the categories of third parties to whom we (1) “sell” personal information; or (2) “share” personal information with for cross-context behavioral advertising. The CCPA defines a “sale” as the disclosure of personal information for monetary or other valuable consideration. We do not sell and have not, within at least the last 12 months, sold personal information. *Note*, we are not required to list disclosures that are infrequent or that are not considered “sales” or “sharing” under the law. We are also required to list the categories of entities to whom we disclose information to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement or otherwise permitted under the law. Please see Section **Error! Reference source not found.** above for more information about how we disclose your information.

5.1. <b><u>CUSTOMER BANKING ACTIVITY</u></b>	
Category	Required Information
Identifiers	<p><i>Real name, alias, 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</i></p> <p><u>Source</u>: Directly from you or our business customer (e.g., if you personally guarantee a business loan); service providers</p> <p><u>Purpose of collection and use</u>: All purposes listed in Sections 2.1 and 2.2, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”</u>: Online identifiers and IP address may be shared with third-party marketing partners</p> <p><u>Categories of Parties to Whom PI is Disclosed</u>: Service providers; business partners such as payment processors, merchants, or other financial institutions; marketing partners; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above</p>
Personal information	<i>Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's</i>

<p>categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p><i>license or state identification card number, education, employment, employment history, medical information</i></p> <p><u>Source:</u> Directly from you or our business customer (e.g., if you personally guarantee a business loan); service providers</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.2, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties With Whom PI is Disclosed:</u> Service providers; business partners such as payment processors, merchants, or other financial institutions; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above</p>
<p>Protected classification characteristics under California or federal law</p>	<p><i>Age (40 years or older), national origin, marital status, gender, veteran or military status</i></p> <p><u>Source:</u> Directly from you or our business customer (e.g., if you personally guarantee a business loan); service providers</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.2, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties With Whom PI is Disclosed:</u> Service providers; business partners such as payment processors, merchants, or other financial institutions; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above</p>
<p>Commercial Information</p>	<p><i>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</i></p> <p><u>Source:</u> Directly from you or our business customer (e.g., if you personally guarantee a business loan); service providers; business partners</p>

	<p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.2, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties to Whom PI is Disclosed:</u> Service providers; business partners such as payment processors, merchants, or other financial institutions; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above</p>
<p>Professional or employment-related information; Education information</p>	<p><i>Institutions attended and degrees obtained; Current and prior job history</i></p> <p><u>Source:</u> Directly from you or our business customer (e.g., if you personally guarantee a business loan)</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.2, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties to Whom PI is Disclosed:</u> Service providers; business partners such as payment processors, merchants, or other financial institutions; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above</p>
<p>Sensory Data</p>	<p><i>Audio (call recordings), electronic, visual (CCTV), or similar information</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.2, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties to Whom PI is Disclosed:</u> Service providers; business partners such as payment processors, merchants, or other financial institutions; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share</p>

	information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above
Sensitive personal information	<p><i>Information reflecting social security, driver’s license, state identification card, or passport number; account log-in/number in combination with any required security code or password; precise geolocation; racial or ethnic origin</i></p> <p><u>Source:</u> Directly from you or our business customer (e.g., if you personally guarantee a business loan); service providers</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.2 above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties With Whom PI is Disclosed:</u> Service providers; business partners such as payment processors, merchants, or other financial institutions; other third parties with your consent or as necessary to provide our financial products and services to customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.2, above</p>
<b>5.2. <u>JOB APPLICANT INFORMATION</u></b>	
<b>Category</b>	<b>Required Information</b>
Identifiers	<p><i>Name, email address, phone number, and contact address, username, password</i></p> <p><u>Source:</u> Directly from you; service providers; business partners such as recruiters</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.3 above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”:</u> None</p> <p><u>Categories of Parties With Whom PI is Disclosed:</u> Service providers; marketing partners; business partners such as recruiters; other third parties with your consent; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.3, above</p>
Personal information categories listed	<i>Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s</i>

<p>in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p><i>license or state identification card number, education, employment, employment history, medical information</i></p> <p><u>Source</u>: Directly from you; service providers; business partners such as recruiters</p> <p><u>Purpose of collection and use</u>: All purposes listed in Sections 2.1 and 2.3 above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”</u>: None</p> <p><u>Categories of Parties With Whom PI is Disclosed</u>: Service providers; business partners such as recruiters; other third parties with your consent; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.3, above</p>
<p>Protected classification characteristics under California or federal law</p>	<p><i>Age (40 years or older), national origin, marital status, gender, veteran or military status</i></p> <p><u>Source</u>: Directly from you; service providers; business partners such as recruiters</p> <p><u>Purpose of collection and use</u>: All purposes listed in Sections 2.1 and 2.3 above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”</u>: None</p> <p><u>Categories of Parties With Whom PI is Disclosed</u>: Service providers; business partners such as recruiters; other third parties with your consent; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.3, above</p>
<p>Professional or employment-related information; Education information</p>	<p><i>Institutions attended, degrees obtained, and courses taken; Current and prior job history</i></p> <p><u>Source</u>: Directly from you; service providers; business partners such as recruiters</p> <p><u>Purpose of collection and use</u>: All purposes listed in Sections 2.1 and 2.3 above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”</u>: None</p> <p><u>Categories of Parties With Whom PI is Disclosed</u>: Service providers; business partners such as recruiters; other third parties with your consent; government entities and others with whom we share</p>

	information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.3, above
Inferences drawn from other information	<p><i>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</i></p> <p><u>Source:</u> We do not actively create profiles of the preferences or interests of our job applications; however, certain of this information may be collected incidentally during the process of evaluating your application for employment</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.3 above</p> <p><u>Categories of Parties to Whom PI is "Sold" or "Shared":</u> None</p> <p><u>Categories of Parties With Whom PI is Disclosed:</u> Service providers; business partners such as recruiters; other third parties with your consent; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.3, above</p>
Sensitive personal information	<p><i>Information reflecting social security, driver's license, state identification card, or passport number; account log-in/number in combination with any required security code or password; racial or ethnic origin, religious or philosophical beliefs, or union membership</i></p> <p><u>Source:</u> Directly from you; service providers; business partners such as recruiters</p> <p><u>Purpose of collection and use:</u> All purposes listed in Sections 2.1 and 2.3, above</p> <p><u>Categories of Parties to Whom PI is "Sold" or "Shared":</u> None</p> <p><u>Categories of Parties With Whom PI is Disclosed:</u> Service providers; business partners such as recruiters; other third parties with your consent; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.3, above</p>
<b>5.3. <u>BUSINESS CONTACT INFORMATION</u></b>	
Category	Required Information
Identifiers	<i>Name, email address, phone number, and business contact address</i>

	<p><u>Source</u>: Directly from you or from the business entity you represent</p> <p><u>Purpose of collection and use</u>: All purposes listed in Sections 2.1 and 2.4, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”</u>: None</p> <p><u>Categories of Parties to Whom PI is Disclosed</u>: Service providers; business partners, such as your employer; other third parties with your consent or as necessary to provide our products and services to our customers; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.4, above</p>
<p>5.4. <b><u>ONLINE USER ACTIVITY</u></b></p>	
<p>Category</p>	<p>Required Information</p>
<p>Internet or other similar network activity</p>	<p><i>Device ID, browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement</i></p> <p><u>Source</u>: Automatically generated when you use the Services.</p> <p><u>Purpose of collection and use</u>: All purposes listed in Section 2.5, above</p> <p><u>Categories of Parties to Whom PI is “Sold” or “Shared”</u>: Marketing partners</p> <p><u>Categories of Parties With Whom PI is Disclosed</u>: Service providers; marketing partners; business partners; other third parties with your consent or as necessary to provide our products and services; government entities and others with whom we share information for legal or necessary purposes; and other entities listed in Sections 3.1 and 3.5, above</p>

5.5. **Sensitive Personal Information**. While some of the categories of information that we collect may be considered “sensitive personal information,” the Company uses and discloses sensitive personal information for those purposes that are authorized by law. For example, we may process your sensitive personal information in order to perform the services or provide the products you request from us, or to verify customer information. California law does not afford you rights to limit the use or disclosure of your sensitive personal information for these purposes.

- 5.6. **Retention.** The length of time we retain personal information will depend on a number of criteria, including (i) the length of time we are required to retain personal information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain personal information in order to accomplish the business or commercial purpose(s) for which such personal information is collected, used or disclosed (as indicated in this Online Privacy Policy), and (iii) whether you choose to exercise your right (subject to certain exceptions) to request deletion of your personal information.

For additional information about your rights as a California resident, see Section 6.3.

## 6. YOUR CHOICES ABOUT YOUR INFORMATION

### 6.1. **Customer Banking Activities**

6.1.1. We treat information collected from or about individuals in connection with any Customer Banking Activities in accordance with applicable federal and state privacy laws including the Gramm-Leach-Bliley Act (GLBA) and the Fair Credit Reporting Act (FCRA). We therefore use and share any information that we collect from or about consumers of our financial products or services consistent with the disclosures in our Consumer Privacy Notice, posted [here](#).

6.1.2. **Accessing and Correcting Customer Banking Activity Information.** Keeping your customer account information up-to-date is very important. You may review or update certain account information and transactions by logging in to the Services or by contacting us. You can also adjust certain profile and privacy settings as follows:

6.1.2.1. **Account profile:** Your online account profile may provide different options for the type of personal information you can provide as well as the types and methods of communication that you prefer. You may view or update your profile and privacy settings by logging in to your online banking account. You may also review or update account information by visiting one of our branches.

6.1.2.2. **Emails:** In all promotional emails, you will be given the opportunity to opt-out of receiving such messages in the future by clicking on the link at the bottom of the email that says “unsubscribe.” It may take up to ten (10) business days for us to process your opt-out request. Please note that even after opting out of promotional emails, we may still send you customer service announcements, administrative notices and Services-related communications (e.g., account notices, transaction confirmations, and security notices).

6.1.2.3. **Text messages:** In the event you are enrolled in any service that provides text messages to you, you can opt-out of receiving text

messages from that service by replying “STOP” to any text message received. You will continue to receive text messages from product lines or services from which you have not opted out.

6.1.2.4. Mobile devices: As with cookies, mobile devices may allow a user to block certain information requests (e.g., location information), but doing so may diminish your experience with our Services. Mobile device or mobile operating system providers typically provide instructions on how to adjust such privacy features.

6.2. **Online User Activity**. Online User Activity information collected by third parties about your visit to, or use of, our Services could potentially be used by those parties for their own purposes, some of whom may be able to associate such information with you based on other information they have collected independently (not from us). When you opt-out as provided below, we will endeavor to block such information collection activities by third parties.

6.2.1. Rejecting Cookies. Most web browsers allow a user to reject cookies, but doing so may diminish your experience with our Services.

6.2.2. Opting Out of Tracking Cookies. We provide all customers and other website visitors with the option of turning off the tracking cookies used on our website by visiting the homepage and clicking on the “Do Not Sell or Share My Personal Information” link. (The California Consumer Privacy Act refers to this as a “Do Not Sell” request.)

6.2.3. Global Privacy Control. Our website supports Global Privacy Control (GPC), which is a setting that allows you to communicate your privacy preferences to websites and online services that you visit. When we detect a GPC signal from a browser, we treat the browser as opted out and to stop sharing personal information for certain targeted advertising purposes, in accordance with applicable laws.

6.2.4. Do Not Track. We do not respond to Do Not Track (DNT) signals and handle all user information as permitted by law consistent with our Terms of Use and this Online Privacy Policy.

6.3. **Additional Notices for Residents of California**

6.3.1. Shine the Light – Your California Privacy Rights. California residents have the right to request information from us regarding other companies to whom we have disclosed certain categories of information during the preceding year for the other companies' direct marketing purposes. If you are a California resident and would like to make such a request, please email us at [privacy@pacwest.com](mailto:privacy@pacwest.com).

6.3.2. Notice of Financial Incentive. We do not provide a financial incentive or a price or service difference to customers in exchange for the retention or sale

of their personal information. We may send promotions or offers to customers or other individuals who subscribe to marketing communications, and unless a customer has opted out of such communications, the customer will continue to receive such notices irrespective of whether any information privacy request described here has been submitted. We do not offer financial incentives to deter customers from making such requests.

6.3.3. CCPA Rights. If you are a California resident, you may have the following rights with respect to your personal information within scope of the CCPA:

6.3.3.1. Right to Access. You have the right to request access to personal information collected about you and information regarding the sources of that personal information, the purposes for which we collect it, and the categories of third parties and service providers with whom we share it with.

6.3.3.2. Right to Correct. You have the right to correct inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

6.3.3.3. Right to Delete. You have the right to request in certain circumstances that we delete personal information that we have collected directly from you.

6.3.3.4. Exercising Your Right to Access, Right to Correct, or Right to Delete. You may submit a request for access to your personal information, to correct your personal information, or to delete your personal information, by completing the [form](#) or emailing us at [privacy@pacwest.com](mailto:privacy@pacwest.com).

To protect your personal information, you must verify your identity before we can act on your request. Thus, we ask you to provide personal identifiers we can match against information we may have collected from you previously, and to confirm your request using the contact information provided in the request. If we need additional information, we will let you know.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you may anticipate. For example, we may decline to honor your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to 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. If we do, we will explain that to you in our response.

6.3.3.5. Authorized Agents. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

6.3.3.6. Right to Opt-Out and Exercising Your Right to Opt-Out. You have the right to opt-out of “sale” and “sharing” (as those terms are defined in the CCPA) of your personal information with certain of third parties. In the past 12 months, we have not disclosed personal information relating to California residents in any manner that we consider a sale within the meaning of the CCPA. We provide all customers and other website visitors with the option of opting out of the sharing of personal information for cross-context behavioral advertising purposes by turning off the tracking cookies used on our website. You can turn off cookies by visiting the homepage and clicking on the “Do Not Sell or Share My Personal Information” link. You can also enable Global Privacy Control (GPC) in your browser.

6.3.3.7. Right to Non-Discrimination. You have the right to be free from discrimination if you exercise your CCPA rights.

## **7. LINKING TO THIRD-PARTY WEBSITES AND SERVICES**

7.1. Our Services may contain links to other websites, services or social media platforms that are owned or operated by other companies (“Third-Party Websites”). Third-Party Websites are not subject to our Privacy Policy. We are not responsible for the practices employed by any Third-Party Websites or services linked to or from our Services, including the information or content contained within them. Your browsing and interaction on any Third-Party Websites or service, including those that have a link on our Services, are subject to that third party’s own rules and policies, not ours. By accessing Third-Party Websites you agree that we are not responsible and do not have control over any third parties that you authorize to access your personal information, which includes your sharing of account credentials with any third party, or linking your activity to any social media platforms or data aggregators.

## **8. INTERNATIONAL CONSIDERATIONS**

8.1. We operate in the United States. While our primary data centers are in the United States, we may transfer personal information or other information outside of the United States. In addition, we may employ other companies and individuals to perform functions on our behalf. If we disclose personal information to a third party, we will seek assurances that any information we may provide to them is safeguarded adequately and in accordance with this

Online Privacy Policy. By providing your personal information, you consent to any transfer and processing in accordance with this Online Privacy Policy.

- 8.2. There may be very limited circumstances under which we process the personal information of European Union or European Economic Area residents (“Data Subjects”) that is deemed “Personal Data” subject to foreign data protection and privacy laws such as the General Data Protection Regulation 2016/679 (“GDPR”). In such circumstances, you (the Data Subject) may have the right to request (a) access to your Personal Data we hold about you; (b) request we correct an inaccurate Personal Data we hold about you; (c) request we delete any Personal Data we hold about you; (d) restrict the processing of Personal Data we hold about you; (e) object to the processing of Personal Data we hold about you; and/or (f) receive any Personal Data we hold about you in a structured and commonly used machine-readable format or have such Personal Data transmitted to another company. If you would like to exercise any of your rights, please complete the form [here](#), or contact us by email at [privacy@pacwest.com](mailto:privacy@pacwest.com) or by mail to Attn: Operations, Pacific Western Bank, 2646 Santa Maria Way, Ste. 101, Santa Maria, CA 93455.

## **9. HOW TO CONTACT US**

- 9.1. Please direct questions or concerns about this Online Privacy Policy or our Services to us at [privacy@pacwest.com](mailto:privacy@pacwest.com) or by mail to Attn: Operations, Pacific Western Bank, 2646 Santa Maria Way, Ste. 101, Santa Maria, CA 93455 or you can call us at 888.981.0097.

## **10. EFFECTIVE DATE**

- 10.1. This Online Privacy Policy was last revised and is effective as of 2.2.2023.