# **NOTICE AT COLLECTION**

The California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA") and its implementing regulations, requires CTBC Bank USA ("Bank" "us" or "we") to provide you with this Notice at Collection prior to collecting personal information from you.

In order to provide banking services to you, we may need to collect your personal information (including sensitive personal information). The categories of personal information and sensitive personal information we may collect, examples of specific personal information that could be included in those categories, and the business purposes for which we might need to collect such information, are set out as follows:

#### **Personal Information**

### **Categories of Personal Information We Collect**

- Personal identifiers, including those listed in California Civil Code Section 1798.80(e): this includes items such as your legal name; aliases; telephone number; email address; postal address; account name; online identifier; device identifier; or IP address.
- Characteristics of protected classifications: this means characteristics about you which may be protected under state or federal law such as date of birth/age; gender; military or veteran status; marital status; nationality; citizenship; or information obtained about you with respect to requests for leave made pursuant to state or federal law.
- **Biometric information**: this means information related to an individual's physiological, biological or behavioral characteristics, such as a fingerprint voice recordings or keystroke patterns and rhythms.
- **Professional or Employment information**: is information related to your professional experiences or other employment-related information such as title; salary; employment files; references.
- **Education information**: this means information related to your education history, such as details of your education and qualifications.
- *Financial details:* this includes bank account numbers; debit/credit card numbers; cardholder or accountholder name and details; transaction details; and account log-in numbers.
- **Commercial Information:** this means information and records regarding transactions completed by you, such as records of personal property, products and service purchased, obtained or considered and purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information: means information regarding your activity on the internet or another electronic network, such as your browsing history, search history, information regarding your interaction with a website, application or an online advertisement.
- **Geolocation data**: means information derived from a device that can be used or is intended to be used to locate your physical location, such as an Internet Protocol (IP) location.
- **Sensory information:** means information and communications obtained from audio, electronic, visual and similar recording devices such as images obtained from video recordings or photographs.
- *Inferences*: means any derivation of information, data, assumptions, or conclusions drawn from any of the above categories used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### **Categories of Sensitive Personal Information We Collect**

- *Identification Numbers*: this means any information that reveals an individual's identity such as social security number, driver's license number, state identification card number, permanent resident card identification number or passport number.
- Financial Account Credentials: this means any information that reveals an individual's financial
  information such as account log-in number, financial account number (such as a loan number or
  deposit account number), debit card number, or credit card number in combination with any required
  security or access code, password, or credentials which would allow someone to gain access to their
  account.
- **Processed Biometric Information**: this means any Biometric information which the Bank performs an operation, set of operations or other procedure on, whether or not by automated means, for the purpose of uniquely identifying an individual.
- Health Information: this means any personal information collected and analyzed concerning an
  individual's health, such as information we obtain to process requests for leave for an employee's
  health condition.
- **Background Information** is any information that reveals an individual's racial or ethnic origin and citizenship or immigration status.

#### **Use of Information**

### **Business and Commercial Purposes for Use of Personal Information**

- Marketing/Prospecting: communicating with you to market our products and services to you via any
  means (including via email, telephone, text message, social media, post or in person) subject to ensuring
  that such communications are provided to you in compliance with applicable law; and maintaining and
  updating your contact information where appropriate. However, we will never use any of the categories
  of sensitive personal information we collect for marketing or advertising.
- *Operation of our websites*: activities to verify or maintain the operation and management of our website, mobile applications or online banking services. However, we will never use any of the categories of sensitive personal information we collect for marketing or advertising.
- *IT operations*: as is necessary to for the management and servicing of our communications systems; operation of our IT security (such as to detect security incidents, and protect against malicious, deceptive, fraudulent or illegal activity); and IT security audits.
- **Health and safety**: to perform health and safety assessments and comply with record keeping obligations; and as is otherwise needed to ensure compliance with related legal obligations.
- Financial management: sales; finance; corporate audit; and vendor management
- **Research**: conducting market or customer satisfaction research; and engaging with you for the purpose of obtaining your views on our products and services. However, we will never use any of the categories of sensitive personal information we collect for general research purposes.
- **Security**: to ensure the physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems)
- *Investigations*: detecting, investigating and preventing breaches of Bank policies, criminal offences and other illegal activity, in accordance with applicable law
- Legal compliance: to ensure compliance with our legal and regulatory obligations under applicable law.

- Legal proceedings: to establish, exercise and defend our legal rights or pursue legal claims.
- *Improving our products and services:* identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services.
- Risk Management: Audit, compliance, controls and other risk management purposes
- *Fraud prevention:* Detecting, preventing and investigating fraud.
- Other Legal Purposes: We may need to use your personal information to comply with legal processes or comply with other laws and regulations.

### **Retention of Personal Information**

The Bank will retain your personal information to carry out its activities and as otherwise required or permitted by applicable law. The criteria we use to determine how long to retain your personal information is based on a number of important factors, such as:

- The regulatory guidelines applicable to the products or services you have requested;
- Federal and state laws and regulations which may mandate we retain your personal information for a specific length of time;
- Whether the Bank needs the personal information to provide the product or service that has been requested:
- Whether the personal information is associated with a former or current customer of the Bank; and
- Whether the personal information may be required in order for the Bank to defend or pursue legal claims in court or to prevent or detect fraudulent or suspicious activity.

## **Accessibility to Consumers with Disabilities**

This Notice is available on our website and is accessible using popular tools for the visually impaired.

#### No Sale of Personal Information

We **do not** sell your personal information to third parties. If you obtain banking products or services from us, we may need to provide certain of your personal information to outside parties who we use to provide those products and services to you. For example, if you obtain a mortgage loan from us, we will need to provide information about your loan to the title insurance company and escrow company that is involved in closing your loan.

# **Link to Privacy Policy**

For more information about your privacy rights, please refer to our Privacy Policy as required by the applicable law by clicking on the following link <a href="mailto:ctbcbankusa.com/Privacy-Statement">ctbcbankusa.com/Privacy-Statement</a>. Then click on California Consumer Privacy Act Online Privacy Policy.

#### **How to Contact Us**

If you have any further questions about your rights under California Consumer Privacy Act, please contact us by email at ccpa@ctbcbankusa.com or by phone at 1-888-889-8000.