

# CALIFORNIA CONSUMER PRIVACY ACT NOTICE

## CONTENTS:

1. INTRODUCTION
2. CATEGORIES OF PERSONAL INFORMATION COLLECTED
3. SOURCES OF PERSONAL INFORMATION
4. OUR PRACTICES REGARDING THE SALE AND SHARING OF PERSONAL INFORMATION
5. CATEGORIES OF PERSONAL INFORMATION THAT WE HAVE SOLD OR SHARED IN THE PAST 12 MONTHS
6. SALE OR SHARING OF PERSONAL INFORMATION OF PERSONS UNDER 16 YEARS OF AGE
7. RECENT INFORMATION COLLECTION AND DISCLOSURE PRACTICES
8. OUR PRACTICES RELATING TO SENSITIVE PERSONAL INFORMATION
9. RETENTION OF PERSONAL INFORMATION
10. YOUR CCPA REQUEST RIGHTS
11. REQUEST TO DELETE YOUR PERSONAL INFORMATION
12. REQUEST THAT WE CORRECT INACCURATE PERSONAL INFORMATION
13. HOW TO MAKE CCPA REQUESTS
14. REQUESTS SUBMITTED BY AUTHORIZED AGENTS
15. OUR RESPONSE TO YOUR REQUESTS
16. OTHER CCPA RIGHTS
17. RIGHT TO LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION
18. UPDATES TO THIS PRIVACY NOTICE
19. FOR MORE INFORMATION

## 1. INTRODUCTION

If you are a California resident with one of the following relationships, please read this notice carefully as it provides information regarding your rights under the California Consumer Privacy Act ("CCPA") for Personal Information you provide to OneUnited Bank ("we", "us", or "our") in the context of the following relationships:

- Individual with a business relationship, such as a sole proprietorship or d/b/a account
- Individual who is an authorized signer on a business account
- Individual who is a guarantor on a business or commercial loan
- Contact persons at business entities, such as a corporation or LLC
- Non-client of OneUnited Bank who has interacted with the Bank's webpage or social media sites
- Trustee for a trust
- Beneficiary for a trust for which OneUnited Bank is trustee

If you are a California resident who has obtained a financial product or service for personal, family, or household purposes, please refer to our [Consumer Privacy Notice](#). You should also review the [Online Privacy Statement](#), which describes our practices relating to Personal Information collected by and through our website, online and mobile banking services, and other online interfaces or platforms that we own or control ("Online Services").

## 2. CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT

"Personal Information" is information that identifies or relates to you as an individual or that, along with other information, could identify you. We believe it is important that you know and understand the types of Personal Information we collect, the purposes for collection, and our practices relating to the disclosure and retention of your Personal Information.

During the past twelve (12) months, we collected the following categories of Personal Information:

Category	Examples*
1. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
2. Personal information categories listed in the California Customer Records	A name, signature, Social Security number, date of birth, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.
3. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, national origin, citizenship, marital status, sex (including gender, gender identity, gender expression), veteran or military status.
4. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
5. Internet or other similar network activity	Information on a consumer's interaction with a website, application, or advertisement.
6. Professional or employment related information	Current or past job history.
7. Sensitive Personal Information	Personal information that reveals a consumer's social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

### 3. SOURCES OF PERSONAL INFORMATION

We collected Personal Information from the following sources:

- You, or your authorized representative
- Our employees
- Our service providers
- Our marketing and advertising providers
- Data brokers
- Our Online Services
- Security cameras and telephone recordings
- Government entities
- Other financial institutions



#### **4. OUR PRACTICES REGARDING THE SALE AND SHARING OF PERSONAL INFORMATION**

The CCPA considers any disclosure of Personal Information or Sensitive Personal Information to a third party for monetary or other valuable consideration to be a sale. Information sharing is defined as the disclosure of Personal Information or Sensitive Personal Information to a third party for the purpose of Targeted Interest-Based Advertising, which is advertising based on your interests as determined by your browsing activities on third-party websites and other online services.

#### **5. CATEGORIES OF PERSONAL INFORMATION THAT WE HAVE SOLD OR SHARED IN THE PAST 12 MONTHS**

We do not sell or share Sensitive Personal Information. We do not sell Personal Information; however, we do share the following categories of Personal Information with our marketing service providers and their advertising networks for the purpose of serving you Targeted Interest-Based Advertisements: Personal Identifiers, Personal Information, and Internet/Other Electronic Network Activity. For information on how you can opt-out of Targeted Interest-Based Advertisements, please refer to the section titled "Right to Opt Out of the Sale/Sharing of Your Personal Information."

#### **6. SALE OR SHARING OF PERSONAL INFORMATION OF PERSONS UNDER 16 YEARS OF AGE**

We do not sell or knowingly share Personal Information or Sensitive Personal Information of persons under the age of sixteen. As such, we do not have actual knowledge that we sold or shared Personal or Sensitive Personal Information for those under the age of sixteen within the past 12 months.

#### **7. RECENT INFORMATION COLLECTION AND DISCLOSURE PRACTICES**

We collect, use, and disclose your Personal Information and Sensitive Personal Information to manage your banking relationship, including determining your eligibility for products and services and processing transactions on your accounts. The categories of third parties who may receive your Personal Information and Sensitive Personal Information for business purposes are:

**Service Providers** – unaffiliated companies that assist us in performing our business operations by processing data and/or transactions related to our bank operations or our relationship with you; fraud prevention and security; and those who assist us in managing our business and regulatory risk, such as our external auditors, insurance providers, and legal counsel.

**Government Entities** – our federal and state regulators, federal and state agencies, state and local law enforcement, and federal and state courts.

**Authorized Parties** – persons you have authorized in writing to receive your Personal Information and/or Sensitive Personal Information or act on your behalf, such as a designated contact, your authorized agent for CCPA requests, and a person to whom you have given a power of attorney.

Our service providers are required to maintain the confidentiality of your Personal Information and Sensitive Personal Information and are restricted from using or disclosing this information other than as needed to perform their contractual obligations with us or as otherwise allowed by the CCPA.



In the past twelve months, we collected and disclosed the following categories of Personal Information to third parties for the business and commercial purposes specified below:

Personal Identifiers and Personal Information (as defined by the California Customer Records Act) were collected and disclosed for the following business and commercial purposes:

- To verify your identity and authenticate transactions you initiate
- Fraud prevention and security
- To perform services on your behalf, such as processing transactions related to your accounts
- To evaluate your creditworthiness or eligibility for products and services
- To contact you
- To inform you of other products and services that we believe would be beneficial to you
- Regulatory reporting
- To comply with applicable laws and regulations
- Risk management and mitigation, including audit, insurance, compliance, legal, and Investigation functions

Personal Identifiers and Personal Information (defined by the California Customer Records Act) were disclosed to the following categories of third parties: Service Providers, Government Entities, and Authorized Parties.

Commercial Information was collected and disclosed for the following business and commercial purposes:

- To perform reviews of your existing products and services
- Fraud prevention and security
- To evaluate your eligibility for bank products and services
- To inform you of other products and services that we believe would be beneficial to you
- Regulatory reporting
- To comply with applicable laws and regulations
- Risk management and mitigation, including audit, insurance, compliance, legal, and Investigation functions

Commercial Information was disclosed to the following categories of third parties: Service Providers, Government Entities, and Authorized Parties.

Protected Classification Characteristics were collected and disclosed for the following business purposes:

- To comply with applicable laws and regulations, including federal and state anti-discrimination laws
- To provide reasonable accommodations due to a disability
- Risk management and mitigation, including audit, insurance, compliance, legal, and investigation functions.

Protected Classification Characteristics were disclosed to the following categories of third parties: Service Providers, Government Entities, and Authorized Parties.



Internet/Other Electronic Network Activity Information was collected and disclosed for the following business and commercial purposes:

- To verify your identity and authenticate transactions you initiated
- To process transactions and account maintenance functions
- Fraud prevention and security
- Analysis of your site usage to determine improvements to the site's functionality
- To serve relevant advertisements to you based on your browsing history on websites and other online channels
- To market our products and services to you
- Risk management and mitigation, including audit, insurance, compliance, legal, and investigation functions

Internet/Other Electronic Network Activity Information was disclosed to the following categories of third parties: Service Providers, Advertising Networks, and Government Entities.

Audio, Electronic, Visual, or Similar Information was collected and disclosed for the following business and commercial purposes:

- Audio and visual information is collected for quality control monitoring, transaction verification, authentication, and security purposes
- Visual information is collected for promotional purposes, such as photos publicizing a bank event
- For fraud prevention, investigation, and security purposes
- For risk management and mitigation, including audit, insurance, compliance, legal, and investigation functions.

Audio, Electronic, Visual, or Similar Information was disclosed to the following categories of third parties: Service Providers and Government Entities.

Professional/Employment Information was collected and disclosed for the following business and commercial purposes:

- Verification, credit underwriting, and transaction authentication purposes
- Risk management and mitigation, including audit, insurance, compliance, legal, and investigation functions.



Professional/Employment Information was disclosed to the following categories of third parties: Service Providers and Government entities.

Sensitive Personal Information was collected and disclosed for the following business purposes:

- To verify your identity and authenticate transactions you initiate
- Fraud prevention and security
- For risk management and mitigation, including audit, insurance, compliance, legal, and investigation functions

Sensitive Personal Information was disclosed to the following categories of third parties: Service Providers, Government Entities, and Authorized Parties.

## **8. OUR PRACTICES RELATING TO SENSITIVE PERSONAL INFORMATION**

We only collect, use, or disclose Sensitive Personal Information as necessary to perform services or provide products you would reasonably expect when you request products or services from us, for fraud prevention and information security, to perform services such as maintaining and servicing accounts, to ensure the physical safety of our employees and clients, or as otherwise authorized by the CCPA and its implementing regulations. We do not use or disclose Sensitive Personal Information for any purpose that enables an individual to exercise a right to limit our use or disclosure of Sensitive Personal Information under California law. Should we change our practice, we will notify you and provide you with the right to limit.

## **9. RETENTION OF PERSONAL INFORMATION**

The length of time that we retain each category of Personal Information depends on the following criteria: (1) the length of time we need the Personal Information in order to accomplish the purposes for which it is collected, used, or disclosed; (2) our corporate standards for record retention; (3) the length of time we are required to retain Personal Information to comply with applicable federal and state laws and regulations; and (4) whether the Personal Information is subject to a dispute, investigation, or legal hold.

## **10. YOUR CCPA REQUEST RIGHTS**

The CCPA gives you the right to make the following requests pertaining to your Personal Information:

### **Request to Know what Personal Information We Have Collected**

You have the right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.

## **11. REQUEST TO DELETE YOUR PERSONAL INFORMATION**

You have the right to request that we delete Personal Information we have collected from you, subject to certain exceptions. For example, we may deny your request if we need your Personal Information to provide you with a product or service, comply with federal or state laws or regulations, detect security incidents, for fraud prevention, or for certain other internal uses allowed by the CCPA.

## **12. REQUEST THAT WE CORRECT INACCURATE PERSONAL INFORMATION**



You have the right to request that we correct inaccurate Personal Information that we maintain about you. We may require you to submit documentation to substantiate your request if we believe our records are accurate and you did not produce documentation with your request. We will accept, review, and consider any documentation you provide in connection with your request to correct, and will only use and maintain your documentation for the purpose of processing and responding to your request and complying with CCPA recordkeeping requirements. We may deny your request if we determine that the contested Personal Information is more likely than not accurate based on all of the information available to us.

### **13. HOW TO MAKE CCPA REQUESTS**

You may make a Request to Know, Correct, or Delete by submitting the request using the [Contact Us Form](#), emailing your request to [privacy@oneunited.com](mailto:privacy@oneunited.com), or by calling the OneUnited Bank Service Center at (877)-663-8648.

To protect your privacy and the security of your Personal Information, we will verify your identity prior to completing your request. We do this by matching information you provide to information we have on file. We may ask you to provide a valid government-issued photo identification, such as a driver's license, as part of the verification process. We may deny your request if we are unable to verify your identity.

### **14. REQUESTS SUBMITTED BY AUTHORIZED AGENTS**

You may authorize an individual or business to submit a Request to Know, Correct, or Delete on your behalf. In order for us to process the request, we must have a written document, signed by you, giving your authorized agent permission to make the request on your behalf. In order to protect your Personal Information, we may also verify your identity or confirm that you gave the authorized agent permission to submit the request(s). Your authorized agent may make a request by following the instructions in the "How to Make CCPA Requests" paragraph, above.

### **15. OUR RESPONSE TO YOUR REQUESTS**

We will provide you with confirmation of your request within ten (10) business days of the date the request is received. We will generally respond to your request within forty-five (45) calendar days of the date we received the request. In some cases, we may take up to another forty-five (45) calendar days to respond. If this occurs, we will notify you before the end of the first forty-five (45) day period and provide you with the reason(s) why we need additional time to complete your request.

If you submit a Request to Delete or Request to Correct, when we respond we will tell you whether or not we were able to complete your request, and if not, the reason. If we delete or correct your Personal Information, we will also instruct any service providers that maintain the information to delete or correct the information, as applicable.

Please note that the CCPA prohibits us from disclosing certain Personal Information, such as Social Security or driver's license numbers, account numbers, health or medical identification numbers, or confidential account information, such as a password or security questions and answers. When we respond to a Request to Know pertaining to such information, we will provide you with a description of the Personal Information we collected.

Your Personal Information may be subject to data privacy laws other than the CCPA. For example, the Gramm-Leach-Bliley Act regulates the privacy of consumer financial information that is collected when an individual obtains a bank product or service for personal, family, or household purposes. If we receive a Request to Know, Correct, or Delete that involves Personal Information that is subject to another privacy law, we may deny



part or all of your request relating to that information as it is exempt from the CCPA. We will inform you of this in our response to your request.

## **16. OTHER CCPA RIGHTS**

**Right to Non-Discrimination for Exercising Your CCPA Rights.**

You have the right not to be discriminated against for exercising your privacy rights under the CCPA. OneUnited Bank will not discriminate against you for exercising any of your CCPA rights.

**Right to Opt Out of the Sale/Sharing of Your Personal Information**

The CCPA gives you the right to opt out of the sale and sharing of your Personal Information and Sensitive Personal Information. OneUnited Bank does not sell Personal Information or Sensitive Personal Information or share Sensitive Personal Information; however, we do share certain Personal Identifiers and Internet/Other Electronic Network Activity information collected by cookies, pixel tags, and similar mechanisms ("Tracking Technologies") to serve you with Targeted Interest-Based Advertising. You have the right to opt-out of Targeted Interest-Based Advertising and may do so by either (1) implementing an opt-out preference signal that complies with California law, such as the [Global Privacy Control](#), on a supported web browser or browser extension, or (2) selecting your cookie preferences in the [Privacy Preference Center](#) settings menu or via the Cookie Settings link in the footer of the Website. If you implement the Global Privacy Control, or other opt-out preference signal that meets California legal requirements, the signal will be read when you first interact with our Website and you will immediately be opted out of sharing for Targeted Interest-Based Advertising. Please note that you will need to manage your cookie settings for each device and browser that you use to access the Online Services.

## **17. RIGHT TO LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION**

The CCPA gives you the right to request that we limit our use and disclosure of Sensitive Personal Information to the purposes detailed in the CCPA and its implementing regulations. For more detail, please refer to the section titled "Our Practices Relating to Sensitive Personal Information". We limit our use and disclosure of your Sensitive Personal Information to the allowed purposes set forth in the CCPA and its implementing regulations.

## **18. UPDATES TO THIS PRIVACY NOTICE**

This Privacy Notice was last updated on April 29th, 2025. We reserve the right to make changes to both our Personal Information practices and this Privacy Notice at any time. Please return to this site frequently to determine if changes have been made. If we make significant changes to this Notice, we will place a message on the [first.bank](#) homepage informing you of the change.

## **19. FOR MORE INFORMATION**

If you have any questions about this Privacy Notice or OneUnited Bank's privacy practices, or if you need to access this Privacy Notice in an alternative format due to having a disability, please use the [Contact Us Form](#), email your request to [privacy@oneunited.com](mailto:privacy@oneunited.com), or call the OneUnited Bank Service Center at (877)-663-8648.