

California Consumer Privacy Act Policy

Last Updated: April 23, 2024

Mission Valley Bank (“MVB” or “we”) is committed to protecting the privacy of personal information of individuals. This California Consumer Privacy Policy (“Policy”) applies solely to individuals who are residents of the State of California (“consumers” or “you”). We adopt this Policy to comply with the California Consumer Privacy Act of 2018 (CCPA), including as amended by the California Privacy Rights Act of 2020. Any terms defined in the CCPA have the same meaning when we use them in this Statement.

We want you to understand what information we collect and how we use it. In addition, we want you to know about important rights you have under the CCPA in connection with your personal information. **However, the rights described in this Policy do not apply to personal information that is either exempted from, or not covered by, the CCPA. For example, certain CCPA privacy rights may not apply to personal information that we collect or disclose in connection with providing personal, family or household financial services pursuant to the federal Gramm-Leach-Bliley Act or its implementing regulations.**

DEFINITIONS

The following are definitions of terms that you will see in this notice.

- **“We”, “our”, and “us”** refer to Mission Valley Bank.
- **“You” and “your”** refer to a **natural person who is a California resident**.
- **“Personal Information”** is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular individual or household.

COLLECTION OF PERSONAL INFORMATION

We have collected the following categories of personal information and categories of sensitive personal information about consumers in the preceding twelve (12) months:

- **“Categories of Personal Information”** are as follows:
 - **Identifying Information** is information that identifies an individual, such as an individual’s name, alias, birthdate, account name or other similar identifiers.
 - **Associated Information** is information that relates to, describes, or can reasonably be associated with a particular individual such as a signature, postal or email address, telephone number, insurance policy number, bank account or card number, and any similar information.
 - **Characteristic Information** is information related to characteristics of protected classifications under state or federal law, such as gender or marital status or beneficiary information.
 - **Commercial Information** is information of a commercial nature, such as records of personal property, products or services purchased or considered, or other purchasing histories.
 - **Biometric Information** is information related to the measurement or analysis of unique physical or behavioral characteristics, such as a fingerprint or voice pattern.
 - **Geolocation Information** is information or data related to a geographical location, such as a device or Internet Protocol (IP) location.
 - **Audio Visual Information** is audio, visual, electronic, or similar information.
 - **Internet Activity Information** is information related to internet or other electronic network activity, such as a search or browsing history, or interactions with a website.
 - **Financial Information** is information related to bank accounts held with us or other financial institutions such as your bank account number, or debit or other payment card information.
 - **Employment Information** is professional or employment-related information, such as employment history or status.
 - **Inference Information** is inferences drawn from any other category of personal information to create a profile about an individual reflecting potential or probable preferences, behavior, abilities, or other similar predispositions.

- “**Categories of Sensitive Personal Information**” are as follows:
 - **Identification Numbers** are any information that reveals an individual’s social security number, driver’s license number, state identification card number, or passport number.
 - **Financial Account Credentials** are any information that reveals an individual’s 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 the account.
 - **Background Information** is any information that reveals an individual’s racial or ethnic origin.
 - **Personal Messages** are the contents of an individual’s mail, email, and text messages if the individual is an employee of the Bank, and where the Bank is not the intended recipient of the communication.
 - **Health Information** is any personal information collected and analyzed concerning an individual’s health.

USING PERSONAL INFORMATION

In the past 12 months, we collected the **Categories of Personal Information** and **Categories of Sensitive Personal Information** about consumers for the following business or commercial purposes:

- **Operational** – Providing services for ourselves, our customers or others, including (but not limited to) maintaining and servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, considering applications for employment, engaging in advertising or marketing (except we will never use any of the Categories of Sensitive Personal Information for marketing or advertising purposes) or carrying out our responsibilities as an employer (such as administering benefits and managing pay and compensation for our employees). To validate your identity when accessing or visiting our sites, applications, branches, and ATMs in connection with our products services, and daily business.
- **Commercial** – Activities that advance our commercial or economic interests (e.g., activities that induce customers to obtain or maintain products and services with us) or that enable or effect transactions.
- **Security** – Activities to protect against malicious, deceptive, fraudulent, or illegal activity, detect security incidents, or hold the perpetrators of that activity responsible.
- **Compliance** – Activities to achieve, verify, or maintain compliance with our policies and procedures or applicable legal and regulatory standards and obligations.
- **Audit** – Auditing compliance with our policies and procedures or applicable legal and regulatory standards and obligations.

SOURCES FROM WHICH WE COLLECT PERSONAL INFORMATION

We collect the categories of personal information and categories of sensitive personal information from the following sources:

- Directly from you
- Credit reporting agencies
- Our service providers
- Persons and entities with whom you perform transactions with
- Your previous employers
- Your previous educational institutions
- Government entities
- Information from corporate clients about individuals associated with the clients (e.g. an employee or board member)
- Security cameras or similar devices when you visit our branches and ATMs.
- Outside companies used to support Human Resources and workforce management activities.

CATEGORIES OF THIRD PARTIES

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

- **Vendors and Service Providers** who provide services such as information technology and related infrastructure, customer service, email delivery and auditing.
- **Partners and Third Parties** who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors who promote the Bank and its financial services and products to customer and other prospective consumers.
- **Other Third Parties** who enable customers to conduct business online and via mobile devices.
- **Government Agencies** as required by laws and regulations.
- **Outside Companies** in connection with routine or required reporting, including consumer reporting agencies.
- **Employment Vendors** who provide employment services to process employment applications, payroll services, provide benefits to employees and dependents, including health care plan and retirement plans.
- **Other Parties** as required or permitted by law.

REQUEST TO KNOW

As a California resident, you have the right to know what personal information a business has collected about you, including the categories of personal information that are collected, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing your personal information, the categories of third parties to whom the business discloses your personal information, and the specific pieces of personal information the business has collected about you.

To submit a request to know, you can either call our toll-free number: (877) 685-9265, email your request to: compliance@missionvalleybank.com or send your request to:

Written Request

Mission Valley Bank
Attention: Compliance Department
9116 Sunland Blvd.
Sun Valley, CA 91352

To ensure we only provide your personal information to you, please provide your full name and phone number so we may contact you to further validate your identity. In order to verify your identity we may require you to provide us with additional information we can use to match with the information we have on file. The amount and type of information we request may vary depending on the sensitivity of personal information covered by the request.

REQUEST TO DELETE

In addition to your right to know, you also have the right to request deletion of personal information the Bank collected, used, disclosed, and sold (subject to certain exceptions).

To submit a request to delete, you can either call our toll-free number: (877) 685-9265; email your request to: compliance@missionvalleybank.com or send your request to:

Written Request

Mission Valley Bank
Attention: Compliance Department
9116 Sunland Blvd.
Sun Valley, CA 91352

To ensure we only delete personal information associated with you, please provide your full name and phone number so we may contact you to further validate your identity. In order to verify your identity, we may require you to provide us with additional information we can use to match with the information we have on file. The amount and type of information we request may vary depending on the sensitivity of personal information covered by the request.

REQUEST TO CORRECT

In addition, you also have the right to request that we correct inaccurate personal information we maintain about you.

To submit a request to correct, you can either call our toll-free number: (877) 685-9265; email your request to: compliance@missionvalleybank.com or send your request to:

Written Request

Mission Valley Bank
Attention: Compliance Department
9116 Sunland Blvd.
Sun Valley, CA 91352

To ensure we only provide your personal information to you or correct your personal information, please provide your full name and phone number so we may contact you to further validate your identity. In order to verify your identity, we may require you to provide us with additional information we can use to match with the information we have on file. The amount and type of information we request may vary depending on the sensitivity of personal information covered by the request.

RESPONSE TIME

We endeavor to respond to a verifiable consumer request to know, request to delete or request to correct within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

SALE OR SHARING OF PERSONAL INFORMATION

You have the right to opt out of the selling or sharing of your personal information, if a business sells or shares your personal information.

We do not sell or share the personal information of consumers to third parties (including the personal information of minors under 16 years old). We have not sold or shared any personal information about consumers in the preceding 12 months.

Additionally, since we do not sell or share your personal information the receipt of an opt-out preference signal will not impact how we collect, use or disclose your personal information.

USE OF SENSITIVE PERSONAL INFORMATION

You have the right to limit the use or disclosure of your sensitive personal information, if a business uses or discloses your sensitive personal information for any reason other than what is specified in the CCPA or its implementing regulations as a permissible use.

We have not used or disclosed any of the Categories of Sensitive Personal Information for purposes other than those specified as permissible uses as set forth in the CCPA and the implementing regulations adopted by the California Privacy Protection Agency (including how the CCPA and its regulations may be amended from time to time) that do not trigger a consumer's right to limit use.

NON-DISCRIMINATION RIGHTS

As a consumer, you have the right to not receive discriminatory treatment for exercising the privacy rights conferred by the California Consumer Privacy Act, including an employee, applicant or independent contractor's right not to be retaliated against for the exercise of their rights.

AUTHORIZED AGENT

A consumer may designate an authorized agent to submit a request on your behalf by sending us written permission of that authorization to:

Mission Valley Bank
Attention: Compliance Department
9116 Sunland Blvd.
Sun Valley, CA 91352

When processing a request submitted by an authorized agent, we may ask the consumer to verify their identify with us through our validation process.

CONTACT FOR MORE INFORMATION

For questions or concerns about the Bank's privacy policies and practices contact us at: compliance@missionvalleybank.com or send your request to:

Mission Valley Bank
Attention: Compliance Department
9116 Sunland Blvd.
Sun Valley, CA 91352