



EagleBank's California Privacy Policy and Collection Notice

Last updated June 7, 2024

This **California Privacy Policy and Collection Notice** (the "Notice") supplements the information contained in EagleBank's Federal Privacy Notice, <https://www.eaglebankcorp.com/privacy-policy/>, and applies solely to residents of the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act (CPRA). Any terms defined in the CCPA and CPRA have the same meaning when used in this Notice.

Information We Collect

EagleBank is collecting your personal information and sensitive personal information to support its business operations, including for business purposes set forth below.

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In the preceding twelve (12) months, we may have collected and disclosed for our business purposes each of the following categories of Personal information relating to California residents covered by this Notice:

- Identifiers such as a 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;
- Personal information such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education,

employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;

- Protected classification characteristics under California or federal law such as sex and marital status;
- Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet or other electronic network activity information, such as browsing history, search history, and information regarding a California resident's interaction with an internet website application, or advertisement;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Professional or employment-related information, such as work history and prior employer; and
- The following categories of Sensitive Personal Information:
 - Government identifiers (social security, driver's license, state identification card, or passport number);
 - Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password);
 - Precise geolocation;
 - Mail, email, or text messages contents not directed to us;

We obtain the categories of personal information and sensitive personal information listed above from the following categories of sources:

- Directly from you. For example, from documents you provide or through products and services you purchase.
- Indirectly from you. For example, from observing your usage of and actions and submissions on our Website.
- From third parties that interact with us in connection with the services we perform. For example, from credit bureaus or other companies.
- From publicly accessible sources, such as commercial databases.

The length of time that we intend to retain each category of Personal Information will depend on several criteria, including:

- the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements,

- 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 Notice), and
- whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

Use of Personal Information and Sensitive Personal Information for Business Purposes

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the request for which you provided us information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third party sites, and emails or text messages. Emails and text messages are sent only with your consent, where such consent is required by law.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA/CPRA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users/consumers is among the assets transferred.

- To audit a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information and Sensitive Personal Information

We may disclose your personal information and your sensitive personal information to a third party for a business purpose. When we disclose personal information and sensitive personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information and sensitive personal information with the following categories of third parties:

- Our affiliates.
- Service providers.
- Contractors.
- Government or regulatory authorities.

Disclosures of Personal Information and Sensitive Information for a Business Purpose

In the preceding twelve (12) months, we may have disclosed the following categories of personal information (as described above) for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Internet or other similar network activity.
- Geolocation data.
- Professional or Employment-related information.
- Inferences drawn from other personal information.

In the preceding twelve (12) months, we may have disclosed the following categories of sensitive personal information (as described above) for a business purpose:

- Government identifiers (social security, driver's license, state identification card, or passport number).

- Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password).
- Precise geolocation.
- Mail, email, or text messages contents.

We disclosed your personal information and sensitive personal information for a business purpose to the following categories of third parties:

- Service providers.
- Contractors.

Sales of Personal Information or Sensitive Personal Information

In the preceding twelve (12) months, we have **not** sold any personal information or sensitive personal information.

Sensitive Personal Information Use and Disclosure Limitations

We have **not** and will **not** use or disclose to a service provider, contractor, or other third party, sensitive personal information for purposes other than the following:

- To perform services or provide goods that an average consumer requesting those goods or services would reasonably expect.
- To help ensure security and integrity, if that use is reasonably necessary and proportionate.
- To perform short-term, transient uses, including but not limited to non-personalized advertising shown as part of a consumer's current interaction with us. However, we will not:
 - disclose the sensitive personal information to another third party; or
 - use it to build a profile about you or otherwise alter the your experience outside your current interaction with us.
- To perform services, including:
 - maintaining or servicing accounts;
 - providing customer service;
 - processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing, storage, or providing similar services for the business.
- To verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us.
- To improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
- To perform other actions that California data privacy regulations authorize.

Your Rights and Choices

California data privacy laws and regulations provide California residents with specific rights regarding their personal information. This section describes your rights and explains how to exercise those rights.

Access to Specific Information and Copy of Personal Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months and to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months (collectively, referred to as your 'access' right). Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The categories of personal information we disclosed or shared with a third party for a business purpose.
- The specific pieces of personal information we collected about you (also called a data portability request).
- The categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party (if applicable).

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if an exception applies, such as regulatory or legal obligations or as required for servicing the account.

Correction Request Rights

You have the right to request that we correct inaccurate personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will correct (and direct our service providers to correct) your personal information in our records, unless an exception applies.

We may deny your correction request if an exception applies, such as regulatory or legal obligations or as required for servicing the account.

Do-Not-Sell Rights

California residents also have the right to opt-out of the sale of their personal information by us, including the sharing of personal information for cross-context behavioral advertising. As noted above, we do not sell personal information about California residents.

Right to Restrict Sensitive Personal Information Processing

California residents have the right to limit the use or disclosure of their sensitive personal information to just actions necessary to perform specific purposes under California law. As noted above, we do not use or disclosure your sensitive personal information beyond what is necessary to perform the purposes permitted under law.

Exercising Access, Data Portability, Correction, and Deletion Rights

To exercise the access, data portability, correction, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 800.364.8313
- Logging on to your personal online banking account at www.eaglebankcorp.com and selecting “Secure Messaging” under Self Service. Choose the topic “Privacy Opt-Out” from the drop down menu.
- Visiting [www.eaglebankcorp.com](CA Privacy Notice)

Only you, or someone legally authorized to act on your behalf (an “authorized agent”), may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

Request Verification

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, 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.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under California's data privacy laws and regulations.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this Notice, our Federal Privacy Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800.364.8313

Website: www.eaglebankcorp.com(CA Privacy Notice)

Email: Logging on to your personal online banking account at www.eaglebankcorp.com and selecting "Secure Messaging" under Self Service. Choose the topic "Privacy Opt-Out" from the drop down menu. If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact 800.364.8313.