



Privacy Notice for California Residents

Effective Date: January 1, 2024

Last Reviewed on: December 28, 2023

This **Privacy Notice for California Residents** supplements the information contained in PCB Bank's [FEDERAL PRIVACY NOTICE](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (**CCPA**) as revised by the California Privacy Rights Act of 2023 (CPRA) and any terms defined in the **CCPA** have the same meaning when used in this Notice.

Information We Collect

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.
- De-identified or aggregated consumer information.
- 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 particular, we have collected the following categories of personal information from our consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, immigration status, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

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

- Directly from our customers or their agents. For example, from forms you complete, and documents that you provide to us related to the products and services you purchase.
- Indirectly from our customers or their agents. For example, through information we collect from our customers in the course of providing services to them.
- Directly and indirectly from activity on our website (www.mypcbbank.com). For example, from submissions through online banking, our website portals, or website usage details collected automatically.
- From third parties, data analytics providers, or government entities. For example, from credit report agency such as Experian when credit report is obtained in the course of reviewing application for credit.
- Directly and indirectly from activity on our website (www.mypcbbank.com). For example, from submissions through online banking, our website portals, or website usage details collected automatically.
- From advertising networks, social networks and internet service providers. For example, information on Facebook and LinkedIn.

Sensitive Personal Information

Bank collects sensitive personal information. Sensitive Personal Information is defined as follows:

Personal information that reveals:

- A consumer's social security, driver's license, state identification card, or passport number.
- A consumer's 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.

The following categories of personal data, if collected, may be considered sensitive and may receive special protection:

- Racial or ethnic origin.
- Citizenship or immigration status
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning sex life or sexual orientation.
- Data relating to criminal convictions and offences.

We may not collect additional categories of sensitive personal information or use or share sensitive personal information collected for additional purposes that are incompatible with the disclosed purpose for which the sensitive personal information was collected without providing the consumer with notice consistent with this section.

Use of Personal Information

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

- To fulfill or meet the reason you provided the 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. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery.
- 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 carry out our obligations and enforce rights arising from any contracts entered into between you and us, including for billing and collections.
- 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 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**.
- 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 consumers is among the assets transferred.

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

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose (e.g. commercial Note sales), 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 share your personal information with the following categories of third parties:

- Service providers.
- Our affiliates, including our parent holding company, PCB Bancorp
- Internet cookie data recipients
- Investors that may purchase our commercial loans

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category E: Biometric information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category H: Sensory data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other personal information.

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

- Service providers.
- Our affiliates, including our parent holding company, PCB Bancorp

Sales of Personal Information

In the preceding twelve (12) months, PCB Bank has not sold personal information.

We share your personal information to the following categories of third parties:

- Investors that may purchase our commercial loans

Your Rights and Choices

The **CCPA** provides consumers (California residents) with specific rights regarding their personal information. This section describes your **CCPA** rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

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. 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 that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

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 retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide goods or services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our banking relationship with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Correction Request Rights

You have the right to request that we correct any of your personal information that we collected from you that is inaccurate or false. 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 the request:

- Conflicts with federal or state laws or there is an exception to the CCPA.
- Documentation is inadequate.
- Compliance proves impossible or involves disproportionate effort
- Is believed in good faith to be fraudulent or abuse.

Exercising Access, Data Portability, Deletion and Correction Rights

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

- Calling us at (888) 979-8133
- Emailing us at privacy@mypcbbank.com
- Visiting www.mypcbbank.com/privacy-policy

- Completing a written request at any of our PCB Bank locations

Only you, or someone legally authorized to act on your behalf, 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. To designate an authorized agent, please complete the Right to Know, Right to Delete and Right to Correct Request form, include the contact information for you and your authorized agent in the space provided, and sign and date the form.

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, which may include:
 - Name
 - Address
 - Telephone Number
 - Email Address
 - Account Number
 - Account Type
 - Transaction Date (non-account holders)
 - Transaction Type (non-account holders)
- 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 will disclose and deliver the required information to consumer free of charge within 45 days of receiving a verifiable consumer request from the consumer. We shall promptly take steps to determine whether the request is a verifiable consumer request, but this shall not extend our duty to disclose and deliver the information within 45 days of receipt of the consumer's request. However, the time period to provide the required information may be extended once by an additional 45 days when reasonably necessary, provided the consumer is provided notice of the extension within the first 45-day period. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Our disclosure shall cover the 12-month period preceding our receipt of the verifiable consumer request and shall be made in writing, and delivered by mail or electronically at the consumer's option in a readily useable format that allows the consumer to transmit this information from one entity to another entity without hindrance. We will not require the consumer to create an account with us in order to make a verifiable consumer request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers and minors we actually know are less than 16 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time. PCB Bank does not sell personal information therefore it is not necessary to opt-out.

Non-Discrimination

We will not discriminate against you for exercising any of your **CCPA** rights. Unless permitted by the **CCPA**, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may, however, offer financial incentives in the future, including payments to consumers as compensation, for the collection of personal information, the sale of personal information, or the deletion of personal information. We may also offer a different price, rate, level, or quality of goods or services to the consumer if that price or difference is directly related to the value provided to the consumer by the consumer's data. Such financial incentives shall be in compliance with and as permitted by CCPA, and refrain from using financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature. Currently, PCB Bank does not have any program incentives that is linked to the collection and use of personal information.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for their direct marketing purposes.

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, the ways in which PCB Bank collects, uses and shares your information described above and in the [FEDERAL PRIVACY NOTICE](#), 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: (888) 979- 8133

Website: www.mypcbbank.com/privacy-policy

Email: privacy@mypcbbank.com

Postal Address:

PCB Bank
Attn: Compliance Department
3701 Wilshire Boulevard, Suite 900
Los Angeles, California 90010