

First Business Bank California Consumer Privacy Act Notice at Collection

(Last updated: June 27, 2024)

This California Consumer Privacy Act Notice at Collection (“Notice”) is provided by First Business Bank and its subsidiaries. These companies are referred to in this notice as “we” or “us.”

Under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”), “personal information” is information that identifies, relates to, describes, or could reasonably be linked with a particular California resident or household. This information is referred to in the Notice as “Personal Data.”

This Notice explains:

1. Categories of Personal Data that we collect about residents of California; and
2. The business or commercial purposes for which we use that Personal Data.

Categories of Personal Data that We Collect

We collect Personal Data in a variety of contexts. For example, we collect Personal Data to provide individual and commercial financial products and services, and vendor management purposes.

The Personal Data that we collect about a specific California resident will depend on, for example, our relationship or interaction with that individual.

We may have collected the following categories of Personal Data in the previous twelve (12) months. We do not sell or share Personal Data, including Sensitive Personal Data.

1. Personal Identifiers – Personal unique identifiers, such as full name and federal or state issued identification numbers including Social Security number, driver's license number, and passport number.
2. Personal Information – Personal information, including contact details such as telephone number and address, financial information such as account number and balance, payment card details including credit and debit card numbers.
3. Characteristics of Protected Classes - Characteristics of protected classes or groups under state or federal law, such as sex, disability, citizenship, primary language, immigrations status, and marital status.
4. Internet or Online Information – Internet or online information such as browsing history, and information regarding interaction with our websites, applications, or advertisements.
5. Geolocation Data – Geolocation data, such as device location.
6. Audio and Visual Information – Audio, electronic, visual, or similar information, such as call and video recordings.
7. Sensitive Personal Information –
 - Social Security number, driver’s license, state identification card, or passport number.
 - Precise geolocation.
 - Racial or ethnic origin, religious or philosophical beliefs, citizenship, or immigration status.

Why We Collect Personal Data and How We Use It

The business and commercial purposes for which we collect and use Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The table below lists the purposes for which we collect and use Personal Data in different contexts.

Purposes for Collection and Use	Examples
Provide and manage products and services	<ul style="list-style-type: none">• Establish and process transactions for our products and services including checking accounts, loans, investment accounts, as well as additional products for businesses such as commercial financing and payment services.

	<ul style="list-style-type: none"> • Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications.
Support our everyday operations, including to meet risk, legal, and compliance requirements	<ul style="list-style-type: none"> • Perform accounting, monitoring, and reporting. • Enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence. • Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims. • Enable the use of service providers for business purposes. • Comply with policies, procedures, and contractual obligations. • Obtain support for fulfilling the above purposes from third-party service providers, professional services and business partners.
Manage, improve, and develop our business	<ul style="list-style-type: none"> • Market, personalize, develop, as well as improve our products and services. • Support customer relationship management. • Evaluate and engage in mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets. • Obtain support for fulfilling the above purposes from third-party service providers, professional services and business partners.
Use of Sensitive Personal Information as permitted by law	<ul style="list-style-type: none"> • Perform services for our business, provide goods or services as requested by individuals, and ensure security and integrity. • Maintain and service accounts, provide customer service, verify customer information, process payments, and provide financing.

Data Retention

We will keep Personal Data no longer than necessary to fulfill the purposes described in this notice. Under our record retention policy, we are required to destroy Personal Data after we no longer need it according to specific retention periods. However, we may need to hold Personal Data beyond these retention periods due to regulatory requirements or in response to a regulatory audit, investigation, or other legal matter. These requirements also apply to our third-party service providers.

First Business Bank’s California Consumer Privacy Act Notice

First Business Bank’s California Consumer Privacy Act Notice is available for review at <https://firstbusiness.bank/privacy-notice/>.

Changes to this Notice

We may change or update this Notice periodically. When we do, we will post the revised Notice on this webpage indicating when the Notice was “Last Updated.”