

First Business Bank California Consumer Privacy Act Notice

Updated: June 30, 2023

This California Consumer Privacy Act Notice supplements the information contained in our Privacy Notice for First Business Bank and its subsidiaries (collectively, “we”, “us”, or “our”).

This notice explains how we collect, use, retain, and disclose ~~Personal Information~~ about California residents. The notice also explains certain rights California residents have under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”).

Your Rights

You may have certain rights under the California Consumer Privacy Act [*Cal. Civ. Code §1798.100, et seq.*] (CCPA) regarding your ~~Personal Information~~, including:

- The right to request the specific pieces of Personal Information we collected about you; the categories of Personal Information we collected; the categories of sources used to collect the Personal Information; the business or commercial purposes for collecting your Personal Information; the categories of your Personal Information disclosed for a business purpose; and the categories of third parties with whom we share your Personal Information each as it pertains to our activities in the preceding twelve (12) months.
- The right to correct inaccurate ~~Personal Information~~ that we maintain about you;
- The right to request, subject to certain exceptions, deletion of your ~~Personal Information~~ that we collected; and
- The right not to be discriminated against for exercising any of these rights.

Information We May Collect

We may collect “~~Personal Information~~”. ~~Personal Information~~ means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device.

Please note that ~~Personal Information~~ does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information; or,
- Information excluded from CCPA’s scope including information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), and the Gramm-Leach-Bliley Act (GLBA)

The table below describes which categories of Personal Information we may have collected and disclosed in the preceding 12 months:

Categories of Personal Information We Collect	The Categories of Sources from Which the Personal Information is Collected	The Business Purpose(s) for Which the Information is Collected, Used, and/or Shared	The Categories of Third Parties with Whom We Share Personal Information
Identifiers This may include 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	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us, and to provide advertising or marketing services to you.	Government Entities, as required by federal or state data reporting requirements.

number, or other similar identifiers.			
Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code §1798.80(e)) This may include a name, signature, Social Security number, 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.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us, and to provide advertising or marketing services to you.	Government Entities, as required by federal or state data reporting requirements.
Protected classification characteristics under California or federal law This may include age, race, national origin, citizenship, marital status, sex, veteran or military status.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us, and to provide advertising or marketing services to you.	Government Entities, as required by federal or state data reporting requirements.
Internet or other similar network activity This may include information on a consumer's interaction with a website, application, or advertisement.	You, your agents, or through our service providers.	To provide you with information, products, or services that you request from us.	We don't share with third parties.
Geolocation data This may include physical location or movements	You, your agents, or through our service providers.	To provide you with information, products, or services, that you request from us.	We don't share with third parties.
Sensory data This may include audio or visual data typically collected via phone and in-person for security and training purposes	You, your agents, or through our service providers.	To provide you with information, products, or services, that you request from us.	We don't share with third parties.
Sensitive Personal Information This may include social security number, driver's license or state identification card number, passport number, precise geolocation, racial or ethnic origin, or 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.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us.	Government Entities, as required by federal or state data reporting requirements.

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.

Sources of Personal Information

We obtain the categories of Personal Information listed above from the following sources:

- Directly from you – for example, from documents that you provide us related to the product(s) or service(s) for which you engage, use, or purchase from us.
- Indirectly from you – For example, through information we collect from you in the course of providing you services.
- Directly and indirectly from activity on our website (<https://firstbusiness.bank>) – For example, from submissions through our website portal or website usage details collected automatically.
- From third parties that interact with us in connection with the services we perform. For example, from credit agencies when we review qualifications for applications for some of our products.

Information Sharing

We may disclose your Personal Information to our service providers to perform a business or commercial purpose, such as to: maintain or service accounts, provide customer service, process payments, provide financing, provide advertising or marketing services, provide analytic services, or provide similar services on our behalf. If we disclose your Personal Information to a service provider, we do so pursuant to a written contract that prohibits the service provider from retaining, using, or disclosing the Personal Information for any purpose other than for the specific purpose of performing the services specified in the contract, or as otherwise permitted by the CCPA.

In the preceding 12 months, we have disclosed the following categories of Personal Information to our service providers for a business or commercial purpose:

- Identifiers
- Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))
- Sensitive Personal Information

First Business Bank and its subsidiaries have not, and do not engage in the sale of Personal Information, including that of minors under 16 years of age.

Exercising Your Rights

To exercise access and deletion rights, please submit a verifiable consumer request to us by either:

- Calling us at 866-432-3247
- Visiting our website <https://www.firstbusiness.bank/contact-us>

Once a request has been submitted, we will attempt to verify that you are the consumer the request applies to. We do that by taking the identifying information you provide (e.g., name, email address, account-related information) and using a combination of the information we have on file and our identity verification engine. We attempt to match a minimum of three data points you submitted. If we are unable to verify your request with the materials you provided, we may reach out to you for additional information.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a valid consumer request related to your Personal Information. An authorized agent can submit a request by clicking [here](#). You may also make a verifiable consumer request on behalf of your minor child.

You may only submit a verifiable consumer request twice within a 12-month period. The verifiable 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; and
- Describe your request with enough detail that allows us to properly understand, evaluate, and respond to it.

If we are unable to complete your request, including the inability to delete information, a copy of it will be logged for future reference within our system.

Request Responses

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Information that we collect, use, and disclose. When these laws apply, Personal Information may be exempt from, or outside the scope of, the CCPA, including with respect to access and deletion requests. As a result, in some instances, we may decline all or part of an access request or deletion request related to this Personal Information.

Responses to a verifiable consumer request will be completed within 45 days of receipt. If more time is required (up to 90 days), the reason and extension period will be sent in writing. The email address you provide in your request will be what we use to communicate to you about your request.

Fees will not be charged to process or respond to consumer requests unless they are excessive, repetitive, or manifestly unfounded. Notification will be provided if a fee is required.

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 notify you by email or through a notice on our website homepage. If no ad-hoc changes are warranted, this privacy notice will be reviewed annually.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or to exercise your rights, please do not hesitate to contact us at:

Phone: 866-432-3247

Website: <https://firstbusiness.bank/contact-us/>