

California Consumer Privacy Statement

For Union Bank and PurePoint

Last Updated: December 30, 2022

This California Consumer Privacy Statement supplements Union Bank [Privacy Policy](#) and PurePoint Financial [Privacy Policy](#) (collectively, “Privacy Policies”). It applies solely to California consumers and addresses personal information we collect online and offline. This Statement does not apply to Union Bank personnel or job applicants or information collected, processed or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act.

This California Consumer Privacy Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, and its implementing regulations (collectively the “CCPA/CPRA”).

1. Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the Last Updated date of this Statement) the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, age, sex, gender, and military and veteran status
- **Sensitive Personal Information:** Social Security number, driver's license, state identification card, or passport number; your 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, racial or ethnic origin, religious beliefs, or union membership, health data, precise geolocation data, biometric information, and sex life or sexual orientation data

- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the Last Updated date of this Statement) your personal information for the purposes described in our Privacy Policies and for the following business purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage or providing similar services
- Providing advertising and marketing services to you, except for cross-context behavioral advertising (which is addressed in Section 6 of this Statement)
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers and therefore do not need to provide a Limit Use and Disclosure of Sensitive Personal Information right under CCPA/CPRA.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

2. Retention of Personal Information

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in our Privacy Policy and this Statement, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

3. Sources of Personal Information

During the 12-month period prior to the Last Updated date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you
- From your devices, such as when you visit our websites, online and mobile applications
- Other individuals, such as authorized agents or family members
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf
- Our joint marketing partners
- Government entities and other publicly-available sources
- Social networks
- Data brokers

4. Sale or Sharing of Personal Information

We do not sell your personal information in exchange for monetary consideration. We may disclose your personal information by allowing certain third parties (such as online advertising services) to collect your personal information via automated technologies on our websites for cross-context behavioral advertising purposes. Under California law, these kinds of disclosures may be considered a “sale” when the personal information is exchanged for non-monetary consideration, or “sharing” when the personal information is disclosed for cross-context behavioral advertising purposes.. You have the right to opt-out of these types of disclosures of your information.

We may sell or share (and may have sold or shared during the 12-month period prior to the Last Updated date of this Statement), the following categories of personal information about you to online advertising services:

- Identifiers
- Commercial Information
- Online Activity
- Inferences

We do not have actual knowledge that we sell or share personal information of minors under 16 years of age.

5. Disclosure of Personal Information

During the 12-month period prior to the Last Updated date of this Statement, we may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

Third Parties and Categories of Personal Information

Category of Personal Information	Category of Third Party
Identifiers	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Our joint marketing partners • Our business partners • Online advertising services and networks • Internet service providers • Data analytics providers • Operating systems and platforms • Social networks • Data brokers
Additional Data Subject to Cal. Civ. Code § 1798.80 Law	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Our joint marketing partners • Our business partners •
Protected Classifications	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Our business partners •
Commercial Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf

	<ul style="list-style-type: none"> • Professional services organizations, such as auditors and law firms • Our joint marketing partners • Our business partners • Online advertising services and networks • Internet service providers • Data analytics providers • Operating systems and platforms • Data brokers
Online Activity	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Our joint marketing partners • Our business partners • Online advertising services and networks • Internet service providers • Data analytics providers • Operating systems and platforms • Social networks • Data brokers
Sensory Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms
Employment Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Our business partners •
Inferences	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Professional services organizations, such as auditors and law firms • Our joint marketing partners • Our business partners • Online advertising services and networks • Internet service providers • Data analytics providers • Operating systems and platforms • Data brokers

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this Statement, we may have disclosed personal information about you with government entities, self-regulatory organizations and third parties in connection with corporate transactions, such as mergers, acquisitions or divestitures, that may assume or have assumed control of all or part of our business.

6. California Consumer Privacy Rights

You have certain choices regarding your personal information, as described below.

Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold or shared about you during the past 12 months.

Correction: You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.

Deletion: You have the right to request that we delete certain personal information we have collected from you.

Opt-Out of Sale or Sharing: You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes.

How to Submit a Request. To submit a request to access, correct, or delete your personal information, click on the "Submit a Request" at the bottom of this page or call toll-free at 1-888-283-6699 (our menu will prompt you through your choices) Monday-Friday 10:00am (ET) - 10:00pm (ET) and Saturday 11:00am (ET) – 8:00pm (ET).

To opt-out of the sale or sharing of your personal information, visit our webpage and click on 'Do Not Sell or Share My Personal Information' in the footer of each website. If you would like to opt-out of the sale or sharing of your personal information associated with a different device or browser, please submit an opt-out request using that device or browser. Please note that if you clear your cookies on a particular browser or device, you may need to resubmit your opt-out request again from that device or browser. For more information on how to opt-out of the sale or sharing of your personal information call toll-free at 1-888-283-6699 (our menu will prompt you through your choices) Monday-Friday 10:00am (ET) - 10:00pm (ET) and Saturday 8:00am (PT) – 5:00pm (PT).

To submit a request as an authorized agent on behalf of another individual, please email privacy@unionbank.com and provide the details regarding your request. If you designate an authorized agent to submit a request to access, correct, delete, or opt-out of the sale or sharing of your personal information on your behalf, we may require you to provide the authorized agent written permission to do so, or provide a power of attorney pursuant to Probate Code sections 4000 to 4465.

For questions or concerns about our privacy policies and practices, please contact us as described in the How to Contact Us section of our relevant Privacy Policies.

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you submit a request to access, correct, or delete your personal information, we may require you to provide any of the following information: name, date of birth, email address, telephone number, or postal address. If you designate an authorized agent to submit a request to

access, correct, delete, or opt-out of the sale or sharing of your personal information on your behalf, (a) we may require you to provide the authorized agent written permission to do so, and (b) for access, correction and deletion requests, we may require you to verify your own identity directly with us (as described above).

Additional Information. If you choose to exercise any of your rights under the CCPA/CPRA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request. Please contact privacy@unionbank.com or call toll-free at 1-888-283-6699. For TDD hearing-impaired assistance through Relay Service, dial 7-1-1; provide the Relay Operator with 1-800-238-4486.

7. Changes to this California Consumer Privacy Statement

We may change this California Consumer Privacy Statement from time to time and will post the revised Privacy Statement on this site. When we do, we will let you know by posting the revised Privacy Statement with a new “Last Updated” date. Any changes to this disclosure will become effective when posted unless indicated otherwise.

[Submit a request](#)