

# California Consumer Privacy Statement

## For MUFG, Union Bank, and PurePoint

Last Updated: December 21, 2021

This California Consumer Privacy Statement supplements the MUFG Americas [Personal Information Protection Policy](#), Union Bank [Privacy Policy](#), PurePoint Financial [Privacy Policy](#) and other relevant privacy policies of affiliated Mitsubishi UFJ Financial Group, Inc. entities (collectively, “Privacy Policies”). It applies solely to California consumers and addresses personal information we collect online and offline. This Statement does not apply to MUFG 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 and its implementing regulations (the “CCPA”).

### 1. Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the effective 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
- **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 effective 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:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services
- Auditing related to 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
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- 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.
- Undertaking activities to market our products and services.

## 2. Sources of Personal Information

During the 12-month period prior to the effective 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
- Vendors who provide services on our behalf
- Our joint marketing partners
- Government entities and other publicly-available sources
- Social networks
- Data brokers

### **3. Sale of Personal Information**

We do not sell your personal information in exchange for monetary consideration. We may allow certain third parties (such as online advertising services) to collect your personal information via automated technologies on our websites in exchange for non-monetary consideration. We share the categories of personal information listed below for online advertising purposes. You have the right to opt-out of this disclosure of your information, which may be considered a “sale” under California law.

During the 12-month period prior to the effective date of this Statement, we may have sold 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 personal information of minors under 16 years of age.

### **4. Sharing of Personal Information**

During the 12-month period prior to the effective date of this Statement, we may have shared your personal information with certain categories of third parties, as described below.

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

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

In addition to the categories of third parties identified above, during the 12-month period prior to the effective date of this Statement, we may have shared personal information about you with government entities and self-regulatory organizations.

## 5. 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 about you during the past 12 months.

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

Opt-Out of Sale: You have the right to opt-out of the sale of your personal information.

**How to Submit a Request.** To submit an access or deletion request, 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 7am(PT) - 9:00pm(PT) and Saturday 8am(PT) - 5pm(PT).

To opt-out of the sale of your personal information, visit our webpage and click on 'Do not sell my personal information' in the footer of each website. If you would like to opt-out of the sale 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 of your personal information call toll-free at 1-888-283-6699 (our menu will prompt you through your choices) Monday-Friday 7am(PT) - 9:00pm(PT) and Saturday 8am(PT) - 5pm(PT).

To submit a request as an authorized agent on behalf of another individual please email [privacy@unionbank.com](mailto:privacy@unionbank.com) and provide the details regarding your request. If you designate an authorized agent to make an access, deletion or opt-out of sale request 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 Reach 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 request access to or deletion of 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 make an access, deletion or opt-out of sale request on your behalf (a) we may require you to provide the authorized agent written permission to do so, and (b) for access 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, 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](mailto: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 or Teletypewriter (TTY) 1-800-826-7345.

## 6. Changes to this CCPA Privacy Statement

We may change this CCPA 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.