

# Peoples Bank CCPA Policy

[applicable to California residents only]

This California Consumer Privacy Act Policy (CCPA Policy) explains information practices online on our website ([www.peoplesbank-wa.com](http://www.peoplesbank-wa.com)), and our other related mobile websites, products and services, tools, mobile applications and other applications and services covered (“Services”). Please contact us if you have any questions.

1. **Scope and Consent.** When you use the Services, you are contracting with Peoples Bank. This CCPA Policy describes how we may collect, use, retain, and disclose your personal information.
2. **Information Practices.** How we collect, use, retain, and disclose personal information.
  - a. **Collection.** When you use our Services, we collect the below types of information from and about you. Some of this information may be considered “personal information,” meaning it reasonably identifies you or your device or it is reasonably associated with you. We also collect, use, and disclose aggregated or deidentified data that does not identify you or your device and is not subject to this CCPA Policy.
    - i. *Personal Information You Provide.* You can browse our Services without actively submitting any information about yourself, but you may choose to provide us with personal information through the Services. For example, you may provide:
      - Identifiers: To register for an account with us, create a profile for your account, open a financial account, and sign up to receive email updates, you may provide personal information such as name, physical address, email address, phone number, your Social Security number, and similar information you choose to provide.
      - Payment or Other Financial Information (Categories of Information in California Civil Code 1798.80): You may submit credit history, other payment or billing information in connection with the opening of an account or any other product or service you have with us.
    - ii. *Required Automatically Collected Information.* In order to provide you with better features and service on our website, we automatically collect personal information when you access and use our Services, including technical identifiers such as your IP address, Internet service provider (ISP), mobile advertising ID, media access control (MAC) address, and identifiers associated with browser cookies, web beacons and similar technologies. We may also collect network analytics information about the devices you use to access our Services such as browser type, language, operating system, geolocation information (if allowed), the referring web page, pages visited, and hyperlinks clicked.
    - iii. *Optionally Collected Information you can opt-out of.* We utilize tracking technologies (including cookies, tracking pixels, flash cookies, and other similar technologies) to remember login information, preferences, and other features. We may also utilize cookies for marketing purposes should you choose to opt into sharing this information with us.
    - iv. *Information from Outside Sources.* We may collect personal information about you from other sources. For example, we may collect personal information about you from analytics companies, advertising networks, demographic companies, other vendors that provide us with information and public data in certain instances so we can better understand you and provide you with information, offers, and products and services that may be of interest to you.
  - b. **Use.** We collect personal information for a variety of business and commercial purposes, such as to:
    - i. Provide, maintain, and improve our Services, as well as to develop new content and features;
    - ii. Process or fulfill payments or transactions;
    - iii. Provide customer service (e.g., to resolve disputes, feedback, problems with your account/profile or the Services);
    - iv. Create and manage your account or preferences;
    - v. Send notifications related to your account and transactions;
    - vi. Send newsletters and promotional messages you request;
    - vii. Conduct internal research and development;
    - viii. Analyze traffic and user activities on our Services, identify popular areas or features, and optimize and personalize the Services;
    - ix. Debug, identify and repair errors that impair the functionality of our Services;
    - x. Process and evaluate applications for positions as an employee or contractor with us;
    - xi. Protect the rights and property of Peoples Bank and others and comply with our legal obligations, including to detect, investigate, and prevent fraud and other illegal activities and to enforce our agreements;
    - xii. Verify your identity (such as when you access your account information);
    - xiii. For any purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or deidentified basis (such that it does not identify any individual customers) for various business purposes, when permissible under applicable laws and regulations.

- c. **Data Retention.** Your information will be retained for as long as needed for us to comply with our contractual obligations, and other business purposes, including global legal obligations to retain data. We may retain some

information from closed accounts so that we can comply with law, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our Terms of Use, or take other actions permitted by law.

- d. **Disclosure.** Information collected may be shared with:
- i. **Service Providers:** We may disclose your information to service providers under contract who help with our business operations (such as fraud investigations, bill collection, payment processing, web hosting, and research). We may also share your information with legal, financial, insurance and other advisors in connection with corporate transactions, the management of our business and operations, to defend against legal claims; to investigate, prevent, or act against illegal activities, suspected fraud, situations involving potential threats to safety, or violations of Peoples Bank’s terms of use; to protect our operations, assets, and intellectual property; to allow us to pursue appropriate legal remedies or limit damages; to pursue any reorganization, merger, sale, joint venture, assignment, transfer of assets, or other disposition of all or any portion of our business, assets, or stock; or as otherwise required by law.
  - ii. **Unaffiliated Websites and Businesses:** Non-affiliates are companies not related by common ownership or control. They can be financial and nonfinancial companies. Peoples Bank shares with a very limited number of non-affiliates so they can market to you.
  - iii. **Advertising Technology (“Ad Tech”) Vendors:** On the Services, we may work with third parties to serve advertisements, provide us with data collection, reporting, and ad response measurement and assist with delivery of relevant marketing messages and advertisements. These third parties may view, set, or edit their own tracking technologies/cookies that are deployed when you visit our Services. The use of these technologies by these third parties is subject to their own privacy policies and we encourage you to review them. They might also obtain information about other applications that you have downloaded to your mobile device, the mobile websites you visit and other information about you or your device in order to analyze and serve targeted advertising on the Services and elsewhere. For more information about third party ad servers and your ability to opt-out of targeted advertising from such third parties, please see Section 4.
  - iv. **Legal and Law Enforcement:** Law enforcement, governmental agencies, or authorized third parties, in response to a verified legal request or court order relating to a criminal investigation or alleged illegal activity or any other activity that may expose us, you, or any other Peoples Bank user to legal liability. In such events, we will only disclose information relevant and necessary to the investigation or inquiry, such as name, city, state, ZIP code, telephone number, email address, user ID history, IP address, fraud complaints, and anything else we may deem relevant to the investigation.
  - v. **Change of Control – New Owners:** We may transfer your personal information as an asset that is part of a merger, acquisition, bankruptcy or other transaction where a third party assumes control of all our part of our business.
  - vi. **Other Entities with your Consent.** Other third parties at your specific direction.

3. **Summary of Information Practices in Last 12 Months.** The following table summarizes personal information collection, use, and sharing practices for the 12 months preceding our last update to the Policy, August 31, 2022. The CCPA considers sharing of information and selling of information to carry the same meaning.

Categories of Personal Information	Categories of Sources	Business Purpose for Collection	Categories of Vendors (including third parties and service providers) to which Personal Information is Shared
Personal identifiers, such as name, physical address, phone number, email address, Social Security Number, mobile number, user name.	<ul style="list-style-type: none"> <li>• You</li> <li>• Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Maintaining and servicing accounts</li> <li>• Providing customer service</li> <li>• Processing transactions</li> <li>• Maintaining and improving products and services</li> <li>• Marketing and advertising</li> <li>• Analytics regarding usage of services</li> <li>• Internal research</li> <li>• Communications with you at your request</li> </ul>	<ul style="list-style-type: none"> <li>• Database providers, IT vendors, cloud vendors, support vendors that need access to such information to perform services for us</li> <li>• Data analytics providers</li> <li>• Advertising technology vendors and other marketing vendors</li> </ul>

Internet or other network activity information, such as IP address, unique device ID, domain information, web pages visited and tracking technologies to collect usage information. For more information reference Section 2.	<ul style="list-style-type: none"> <li>Your computer, mobile phone or other devices used to access our services</li> </ul>	<ul style="list-style-type: none"> <li>Analytics regarding usage of services</li> <li>Online authentication</li> <li>Internal research</li> <li>Marketing and advertising</li> <li>Providing and maintaining products and services</li> </ul>	<ul style="list-style-type: none"> <li>IT vendors, cloud vendors, database service providers, and providers that need such access to perform services for us</li> </ul>
Geolocation information, such as location of mobile device.	<ul style="list-style-type: none"> <li>Your computer, mobile phone or other devices used to access our services</li> </ul>	<ul style="list-style-type: none"> <li>Analytics regarding usage of services</li> <li>Online authentication</li> <li>Internal research</li> <li>Marketing and advertising</li> <li>Providing and maintaining products and services</li> </ul>	<ul style="list-style-type: none"> <li>IT vendors, cloud vendors, database service providers, and providers that need such access to perform services for us</li> </ul>
Demographic information, such as gender or age.	<ul style="list-style-type: none"> <li>You</li> </ul>	<ul style="list-style-type: none"> <li>Analytics regarding usage of services</li> <li>Internal research</li> </ul>	<ul style="list-style-type: none"> <li>Ad networks and other marketing vendors</li> <li>IT vendors, database providers and vendors that provide services for us</li> </ul>

**Sale of Personal Information:** We do not sell your information website based activity data for money but we and our business partners use tracking technologies to help us to understand our customers and visitors to the Services, to enhance your online experience, and customize our offerings in ways that may be deemed a “sale” of personal information under the California Consumer Privacy Protection Act (CCPA). This includes working with third parties such as ad networks which collect personal information via tracking technologies to personalize and serve advertisements on and off our Services, provide us with data collection, reporting, and ad response measurement. **To the extent we or our partners use such technologies on the Services, we offer an opt-out as discussed in Section 4.** We provide personal data to third party business partners for everyday business purposes such as processing transactions, maintaining accounts, responding to legal orders or reporting to credit bureaus. There is no opt-out for the sharing of this personal data.

We do not knowingly sell or otherwise disclose the personal information of minors under the age of 18.

4. **Choices for Access, Deletion, Opt-Out of Sale, and Right to Non-Discrimination for California Residents or as Required by Law.**
- a. If you are a California resident, you have the right to know what personal information we collect, disclose, and “sell” about you (as that term is used in the CCPA). Additionally, you have the right to access, delete and opt out from the “sale” of your personal information.
  - b. By default, we assume that users are “opting-out” of tracking via cookies and other technologies unless they choose to “opt-in” for all uses except those that are essential to the function of our services. While we may continue to use this technology to provide needed function, we will not store preferences or place marketing cookies or use similar technology.
  - c. To exercise these privacy rights and choices, please follow the instructions below:
    - i. **How to Request Access to Personal Information:** You may request access to your personal information once in a 12-month period. To do so, please complete the [request form](#) in the Peoples Bank Privacy Rights Portal or call our Customer Contact Center at 1-800-584-8859. Account holders can request access to their personal information at any time by logging into their accounts on the Services. In response, we will produce an Access Report detailing the personal information we have collected, disclosed, and/or sold about you. This Access Report will be delivered by mail or electronically at your request.
    - ii. **How to Request Deletion of Personal Information:** You may request that Peoples Bank delete the personal information it has collected and/or maintained about you. To do so, please complete the [request form](#) in the Peoples Bank Privacy Rights Portal or call our Customer Contact Center at 1-800-584-8859. Note, we may need to retain certain personal information as permitted by law, such as to complete the transaction for which the personal information was collected, provide a requested service, detect security incidents, protect against malicious, deceptive, fraudulent or illegal activities, comply with legal obligations such as those required by the

- Gramm-Leach-Bliley Act or the California Financial Privacy Act, or to enable solely internal uses that are reasonably aligned with your expectations or lawful within the context in which you provided the information.
- iii. **How to Opt-Out of the Sale of Personal Information:** To opt out from the use of cookies, and other tracking technologies you can click Opt Out on our website cookie banner. This will cause information to cease to be added to any cookies or other tracking technologies that have been set on our Services or block them entirely. Please note that you will need to opt out again if you visit one of our Services from a different device or browser or if you clear your cookies. To opt-out of the sale of your personal information, please complete the [request form](#) in the Peoples Bank Privacy Rights Portal or call our Customer Contact Center at 1-800-584-8859.
  - iv. **How to reset cookie collection choices on your web browser.** To change your opt-in settings on the website after you have already set them once, delete your cookies and browsing history from your web browser. You will be re-presented with the opt-in cookie banner.
- d. **Verification:** Please note, we will take steps to verify your identity before fulfilling any of the above requests. If you maintain an account with us, we will verify your identity through existing authentication practices for the account.
  - e. **Authorized Agents:** You can use an authorized agent to make requests on your behalf. We will require the agent has power of attorney in connection with a request for access or deletion, unless the requestor is a minor in which case a legal guardian can make the request.
  - f. **Anti-Discrimination Right:** You have the right to be free from discrimination in product quality, goods or services because you decide to exercise your privacy rights under the CCPA.
  - g. **Do Not Track Signals:** Peoples Bank does not respond to Do Not Track signals to the extent received from a web browser. Because there currently is not a universally accepted technological or legal standard for recognizing or honoring Do Not Track signals as reflecting user's choice, we do not respond to them at this time. Once such technology is created and has received applicable regulatory approval, we will consider whether it is possible, and if so, how it can be incorporated within Peoples Bank's environment in the future.
5. **Communication Preferences and Marketing (including Opt-out).** If you do not wish to receive marketing communications from us, you can opt-out as described in Section 4, or indicate your communications preference through your account/profile settings. You may not opt-out of administrative emails (for example, emails about your transactions or policy changes) for your registered account.
  6. **Additional Choices.** If you have consented to our collection of your personal data for multiple specific purposes or explicitly consented to our collection of special/sensitive categories of personal data (i.e., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person) your consent can be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.  
For information about how to access, delete, or update your personal information or opt out of the sale of your personal information, go to Section 4 (Choices for Access, Deletion, Opt-Out of Sale, and Right to Non-Discrimination for California and other U.S. Residents.).
  7. **Third Parties.** Our Services may contain links to other third-party websites. Peoples Bank may provide links to websites that are owned or operated by other companies. When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website. We are not responsible for the privacy practices or the content of these third-party sites and do not have the ability to limit tracking on third party sites.
  8. **Security.** We maintain reasonable technical, physical, and administrative security measures designed to help protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration. Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us. It is your responsibility to make sure that your personal information you submit is accurate. If you believe that your login credentials have been compromised, please make sure to contact us as indicated in the Contact Us Section, below.

9. **Children's Privacy.** Services are not intended for individuals under the age of 18. We do not knowingly collect personal information via Services from users in this age group. We request that such individuals do not provide personal information through the Services.
10. **Notification Regarding Updates.** We will change this CCPA Policy from time to time. When we make changes, we will revise the date at the top of the policy and, in some cases, will notify you through the Services, such as on our homepage, or via email or other communication. Any changes to this CCPA Policy will become effective when posted unless indicated otherwise.
11. **Contact Us.** If you have further questions, you may call our Customer Contact Center at 1-800-584-8859.