

NANO BANC Member FDIC

Nano Bank has adopted the following policy to describe certain rights you have under the California Consumer Privacy Act (CCPA) if you are a California resident. Please refer to the following sections for more information.

- 1. Your Rights
- 2. What Personal Information is Covered?
- 3. What Personal Information is Not Covered?
- 4. Your Choices
- 5. Our Personal Data Collection and Disclosures

1. Your Rights

The California Consumer Privacy Act grants California residents or another person authorized to act on behalf of a California resident, the right to:

- Know what personal information Nano Banc has collected, used, disclosed, or sold over the previous 12 months
- Know whether Nano Banc sells your personal information, and if so, to whom
- Opt-out of the sale of their personal information
- Request that Nano Banc disclose to you:
 - The categories of personal information that we have collected about you;
 - The categories of sources from which the personal information was collected;
 - The business or commercial purpose for collecting the personal information;
 - The categories of third parties with whom the Banc shares the personal information; and
 - The specific pieces of personal information that we have collected about you;
- Request that Nano Banc delete your personal information and
- Not receive-discriminatory treatment by Nano Banc, for the exercise of your privacy rights under the CCPA.

2. What Personal Information is Covered?

Personal information is defined under the CCPA to include any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household. Examples include social security numbers, account information, transaction histories, credit information, and biometric data.

3. What Personal Information is Not Covered?

The CCPA does not apply to personal information collected or disclosed in connection with financial products or services that are used primarily for personal, family, or household purposes. For that, please see our <u>GLBA</u> <u>Privacy Notice</u>.

The CCPA does not apply to some personal information that reflects a communication or transaction between the Banc and another business entity or government agency, so long as that communication or transaction involves due diligence about the Banc or other business, or the Banc is providing or receiving a product or service.

The CCPA also currently does not afford access or deletion rights to you if your information was collected and used by the Banc in the context of your role as a job applicant, employee, owner, director, officer, medical staff member, or contractor of the Banc although you are still entitled to receive a Notice at Collection and this Privacy Policy.

4. Your Choices

Nano Banc does not currently sell personal information to third parties and has not engaged in the sale of personal information in the preceding 12 months. If Nano Banc ever plans to sell personal information in the future, you will be provided notice and the opportunity to opt-out. Nano Banc does not have actual knowledge that it sells the personal information of minors under the age of 16 without affirmative authorization.

Disclosure of Personal Information: If you wish to request a disclosure of your personal information collected by Nano Banc, or have questions regarding our policy or practices, you may do so by calling **1-844-529-4091**, by emailing **DPM@NanoBanc.com**, or by submitting your request at www.NanoBanc.com/Privacy.

Deleting Personal Information: If you wish to request that Nano Banc delete your personal information, you may do so by calling toll-free **1-844-529-4091**, by emailing **DPM@NanoBanc.com**, or by submitting your request at https://www.nanobanc.com/privacy/.

Please understand that not all personal information is eligible to be deleted due to requirements for financial organizations to comply with various state and federal regulations and available statutory exemptions.

Before disclosing the personal information we may have collected about an individual or before completing a request to delete personal information, we must verify the identity of the person making the request to a degree of certainty based upon the sensitivity and nature of the information requested and the type of requests we receive. Generally, this validation process involves comparison of information provided by the Consumer to the information that Nano Banc deems reliable in our records. Methods or information necessary to validate an individual's identity and/or the validity of an authorized agent depend upon whether they are an existing customer of the Banc, the transactions that the individual engaged in, or the personal information that we have on file. Sufficient information and/or documentation must be provided before we are able to complete any request to protect you and the Banc from fraud and identity theft.

Authorized Agent Process

Authorized agents may submit requests according to the instructions above. In situations where a designated authorized agent makes the request on behalf of an individual, we must also verify the validity of that individual and their authorization to submit requests on another's behalf.

5. Our Personal Data Collection and Disclosures

Categories and Examples of Personal Information we Collect

Categories of Personal Information We Have Collected in the Previous 12 Months	Examples of Specific Personal Information that Could be Included
Identifiers or Personal Information	Your legal name, aliases, work or home address, unique personal identifier, online identifier, IP address, email address, account name social security number, driver's license or identification number, passport number, signature, home/mobile or work telephone number, insurance policy number, education, employment history, bank account number, credit card or debit card number, physical characteristics, other financial information, or other similar identifiers.
Protected Classifications under State or Federal Law	Your race, sex/gender, ethnicity, disability, ancestry, marital status or veteran status.
Commercial Information	Your credit history, income and tax records, insurance, personal property and real estate records, products or services previously purchased or considered from us, previous applications filed, inquiries about your account, or other purchasing or consuming histories or tendencies.
Biometric Information	Your fingerprints or facial characteristics.
Internet or Other Similar Network Activity Information	Your browsing history, search history, or interaction with an internet website, application, or advertisement.
Geolocation Data	Your device location or location of devices used for employment purposes.
Audio, Electronic, Visual, or Similar Information	Recordings or images of you, your actions while in or around our locations, or your voice.
Education Information	Your information subject to the federal Family Educational Rights and Privacy Act such as student records or education history.
Professional or Employment related Information	Your current or past employment history, certifications earned, or performance evaluations.
Inferences drawn from any of the information identified above to create a profile about a Consumer	Your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.



Business Purpose for Collecting Such Information

- To identify you or communicate with you
- To cash a check or assist you in another one-time financial transaction
- To take and process an application for a requested product or service
- To offer, provide, and service your financial products or services
- To consider you for an employment opportunity as permitted by law
- To ensure proper operation and security protocols necessary to protect against fraud or illegal activities
- To detect, prevent, and respond to security incidents
- To meet our legal and regulatory obligations

Nano Banc collects personal information directly from consumers and other individuals, and from other sources, including the following:

- Credit bureaus;
- State and federal bureaus, agencies, and departments;
- Public websites and social media;
- Vendors and service providers;
- Other financial institutions;
- Transactional counterparties; and
- Employee and customer referrals.

Disclosure of Personal Information

Categories of Personal Information We Have Disclosed for a Business Purpose in the Previous 12 Months	Categories of Third Parties to Whom the Personal Information Was Disclosed To
 Identifiers or Personal Information Protected Classifications under State or Federal Law Commercial Information Biometric Information Internet or Other Similar Network Activity Information Geolocation Data Audio, Electronic, Visual, or Similar Information Education Information Professional or Employment related Information Inferences drawn from any of the information identified above to create a profile about a Consumer 	Credit bureaus, law enforcement authorities, regulators, and trusted third- party service providers.

Contact for More Information

Call us toll free (844) 529-4091, email us at DPM@NanoBanc.com, or submit a request at www.NanoBanc.com/privacy.