

NANO BANC

NOTICE AT OR BEFORE COLLECTION

Effective Date: December 20, 2023

In accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CPRA”), we are providing you with the following Notice at or Before Collection to identify the categories of Personal Information and Sensitive Personal Information we may collect from you, a description that provides a meaningful understanding of the information being collected, the business or commercial purpose for collecting the information, and whether we sell or share that information. Capitalized terms used in this Notice have the meanings defined in the CPRA.

Category	Description	Business or Commercial Purpose for Collecting the Information*	Will This Information be Collected From You?	Do We Sell or Share this Information?
A. Identifiers.	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 number, or other similar identifiers.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and/or 13 *See “Business or Commercial Purposes Table” Below for More Information.	YES	NO
B. Personal information categories listed in the California Financial Institution Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, 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. Some personal information included in this category may overlap with other categories.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and/or 13	YES	NO
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and/or 13	YES	NO

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and/or 13	YES	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and/or 13	YES	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	2, 3, 4, 5, 6, 7, 8, 9, 10, 12, and/or 13	YES	NO
G. Geolocation data.	Physical location or movements.	2, 3, 4, 5, 6, 7, 8, 9, and/or 10	YES	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and/or 12	YES	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	1, 3, 4, 5, 6, 7, 8, 9, 10, 11, and/or 13	YES	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and/or 13	YES	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, and/or 13	YES	NO

Business or Commercial Purposes Table	
Category	Description
1	To fulfill or meet the reason you provided the information. For example, if you share your name and contact information with us to request a rate quote, to ask a question about our products or services, or to process a transaction, we will use that personal information to respond to your request and to process your transactions. We may also save your information to facilitate new transactions in the future. We also use your information for customer service and collections purposes and for ongoing account maintenance purposes, such as providing account statements, providing access to online banking, and providing account notifications.

2	To provide, support, personalize, and develop our website, products, and/or services.
3	To create, maintain, customize, and/or secure your account with us.
4	To process your requests, transactions, and payments and to prevent transactional fraud.
5	To provide you with support and to respond to your inquiries, including to investigate and address your concerns and to monitor and improve our responses.
6	To help maintain the safety, security, and integrity of the Bank; our website; our products and/or services; and our databases and/or other technology assets.
7	To prevent fraud by monitoring activity to detect, investigate, and/or prevent potentially fraudulent transactions or other illegal activities, as well as to protect the rights and property of the Bank and/or our customers.
8	To respond to law enforcement requests as required by applicable law, court order, or governmental regulations.
9	As described to you when collecting your Personal Information or Sensitive Personal Information or as otherwise set forth in applicable law.
10	To support our operations and to comply with applicable legal and/or regulatory requirements.
11	To communicate with you via any means (including email, telephone, text message, or in person) about products, services, and/or events offered by the Bank and others as well as to provide news and information we think may be of interest to you.
12	To respond to your comments, questions, and customer service requests, as well as to send you support notices, updates, security alerts, and administrative messages (such as changes to our terms, conditions, and/or policies).
13	To monitor and analyze trends, usage, and/or activities in connection with our products and/or services.

We will not collect additional categories of Personal Information or Sensitive Personal Information or use the Personal Information or Sensitive Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you with notice. We do not sell or share your Personal Information or Sensitive Personal Information (other than with our service providers and/or contactors as permitted under applicable law).

We will retain the Personal Information or Sensitive Personal Information we collect about you for the period of time necessary for us to carry-out the business or commercial purpose(s) for which the information was collected. If you are a customer of the Bank, we may retain your information while you are a customer. In addition, we may retain your information for any additional time period that we reasonably believe we are required to retain the information in order for us to comply with applicable law.

To view our CCPA/CPRA Privacy Notice for California Residents, which describes our general information collection, use, and sharing practices in more detail, click this link: <https://www.nanobanc.com/privacy-policy/>