

NANO BANC Member FDIC

Nano Banc recognizes and respects how important financial privacy is to you. This *Privacy Policy* ("Policy") applies to all individuals interacting with Nano Banc, including:

- External website and mobile app users
- Potential and current customers
- Job applicants
- Current and former employees
- Contractors and temporary workers

This single comprehensive policy addresses privacy practices across different types of interactions with Nano Banc, recognizing that while some specific data collection and usage may vary between external users and employees, fundamental privacy principles remain consistent.

For customers of Nano Banc, we also have a separate Privacy Notice which addresses additional information collection and sharing practices. The terms "we," "us," "our," "Bank," and similar terms in this Policy shall refer to Nano Banc. The terms "you," "your" and similar terms encompass all individuals covered by this Policy, whether as external users, customers, or employees.

### **Collection, Use and Retention of Your Information**

We may collect, use, and retain nonpublic personal information to:

- Comply with legal requirements
- Respond to requests and inquiries
- Administer accounts and services
- Manage employment relationships
- Ensure organizational security and operations

For the purpose of this policy, the term "nonpublic personal information" includes personally identifiable financial information.

### **Information Sources for Personal Information**

#### *For External Users and Customers*

- Information provided during inquiries or service requests
- Application forms
- Website and mobile app interactions
- Customer communication channels

#### *For Employees and Applicants*

- Employment applications
- Background check information
- Performance and professional development records
- Communication during recruitment and employment
- Work-related contact and identification information

**Specific Information Collected**

- Name and contact details
- Social security or identification numbers
- Financial information
- Professional credentials
- Employment history
- Performance evaluations
- IP addresses and online interaction data

**Disclosure of Information**

We do not disclose nonpublic personal information except as permitted by law and consistent with this Policy. Permitted disclosures may include:

*For External Users and Customers*

- Transactions you initiate
- Compliance with legal processes
- Consumer reporting agencies
- Service providers supporting our products

*For Employees*

- Legitimate human resources operations
- Compliance with employment laws
- Payroll and benefits administration
- Required government reporting
- Internal organizational management

**Cookies**

A cookie is a small piece of information sent by a website that is saved on your hard disk by your computer's browser. We use cookies for various purposes:

*Website Functionality*

- Identifying your Internet browser
- Determining software compatibility
- Providing interactive session experiences
- Personalizing online banking services

*Interaction and Comment Cookies*

- Saving name, email, and website details for convenience
- Comment submission cookies

There are different types of Cookies that last for different lengths of time:

- Temporary cookies for browser compatibility {browser determines cookie lifespan}
- Login information cookies {last two days} - if you logout, these are removed
- "Remember Me" functionality (two weeks)
- Screen display preference cookies (last one year)

**Web Browser Settings and Control of Personally Identifiable Information Collection**

You may activate web browser tracking settings to control personally identifiable information collection. Our tracking mechanisms include:

- Cookies placed on your computer
- Authentication and information security tracking

Important Tracking Considerations:

- Declining cookies may limit website features
- Some tracking cookies persist after browser clearing
- You can modify tracking settings in your browser

**Embedded Content**

Articles on this site may include embedded content {e.g., videos, images, articles, etc.}. Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website

**Third Parties**

When you use our website or online services, third parties acting on our behalf may collect personally identifiable information and website activity identified above. Also, third parties may offer services on our website from time to time. If you access their websites or provide them with information, these third parties may track your activity across websites and collect your personally identifiable information, all subject to the third party's privacy and security practices.

**Mobile Application**

The mobile application requests access to information stored on your device such as location, camera, contacts, or other features you are enrolled in to enrich and simplify your own user experience and improve our services, as well as provide additional security to protect your account.

It is important for you to understand that:

- Before granting access to this information, you will be prompted to give the application that permission.
- If you do not wish to grant that permission, you may decline.

If you later change your mind, those permissions can be updated in your device's settings.

**Data Protection Measures**

We implement comprehensive security measures to protect personal information, including:

- Administrative safeguards
- Technical security protocols
- Physical access controls
- Employee training on data protection
- Regular security assessments

#### *Employee-Specific Privacy Protections*

- Limited access to personal information
- Confidential personnel file management
- Secure digital and physical recordkeeping
- Strict internal data access controls

#### **Maintenance of Accurate Information**

We have implemented procedures to help ensure that your nonpublic personal information is maintained in a commercially reasonable manner so that it is accurate, current, and complete. We respond to reports of incorrect or incomplete nonpublic personal information that is within our control and will correct the information when we have confirmed that it is inaccurate, in a timely manner. If you would like to report an error or update your nonpublic personal information, please telephone us (844) 626-0262 or write to us at:

Nano Banc  
7755 Irvine Center Drive, Suite 300  
Irvine, CA 92618

#### **How Long We Retain Your Data**

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

#### **What Rights You Have Over Your Data**

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

#### **Protection of Information**

We use commercially reasonable administrative, technical, and physical measures to safeguard personal information in our possession against loss, theft and unauthorized use, disclosure, or modification. Our employees, agents and contractors are provided access to personal information only to the extent they have a legitimate business reason to obtain such access. In addition, we use commercially reasonable methods to make sure that personal information is accurate, up-to-date and complete.

#### **Email**

If you are communicating to us by email, please be aware that email is not necessarily secure against interception and could be read by others outside of Nano Banc. If you are sending us information that contains sensitive information or includes personal or confidential information, such as your bank account number, a charge card or debit card number or social security number, you should send your

correspondence to us via postal mail to Nano Banc, 7755 Irvine Center Drive, Suite 300, Irvine, CA 92618 or contact us at (844) 626-0262.

### Access to Your Personal Information

If possible, we will let you review your personal information that you provided to us and will take reasonable steps to correct any personal information that you inform us is incorrect. Call us at (844) 626-0262 if you would like to view the personal information that you have provided to us.

### Protecting Children's Privacy Online

This website is not intended for individuals under the age of thirteen (13), and we request that these individuals do not provide personally identifiable information through this website. We do not knowingly collect information from children under 13 without parental consent. Visit the Federal Trade Commission website for more information about the *Children's Online Privacy Protection Act (COPPA)*.

### Policy Revisions

We may revise this Policy to reflect changes in the law, our own privacy practices, or the features on our website. If any changes materially impact the way we collect, use, or share personally identifiable information, this Policy will be updated, and the updated Policy will be posted with a new effective date. You should periodically review this Policy to continue to be aware of our current online privacy practices.

### Contact Us

If you are concerned about your financial privacy, would like to know more about this important subject matter, would like to make a complaint about this notice, or wish to obtain a copy of our Online Privacy Policy, you can contact us directly by phone at (844) 626-0262, via email: [compliance@nanobanc.com](mailto:compliance@nanobanc.com) or in writing at the following address: Nano Banc, 7755 Irvine Center Drive, Suite 300, Irvine, CA 92618.

### Privacy Law Compliance

Nano Banc is committed to complying with applicable data protection and privacy laws, including:

- California Consumer Privacy Act (CCPA)
- General Data Protection Regulation (GDPR)
- Virginia Consumer Data Protection Act (VCDPA)
- Colorado Privacy Act (CPA)

As a user, you have the following rights under these regulations:

1. Right to Know: You can request details about the personal information we collect, use, and share.
2. Right to Delete: You may request deletion of your personal information.
3. Right to Opt-Out: You can opt-out of the sale or sharing of your personal information.
4. Right to Non-Discrimination: We will not discriminate against you for exercising these privacy rights.

To exercise these rights, please contact us at:

- Phone: (844) 626-0262
- Email: [compliance@nanobanc.com](mailto:compliance@nanobanc.com)
- Postal Mail: Nano Banc, 7755 Irvine Center Drive, Suite 300, Irvine, CA 92618

We will respond to your request within the timeframes specified by applicable law