

# Privacy Policy

Effective January 1, 2020

This Privacy Policy (“Policy”) applies to customers, visitors, and others (“consumers” or “you”) of Fresno First Bank and its holding company, Communities First Financial Corporation, (“we”, “FFB” or “us”) and interact with the bank, the bank’s mobile applications, or website (collectively “Services”). It is important that you read this Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing your Personal Information so that you understand how and why we are using your data. This Policy supplements those other notices and is not intended to override them.

## **This Policy describes:**

- Personal Information We Collect;
- How We Collect Your Personal Information;
- How Share Your Personal Information;
- How We Use Your Personal Information;
- How We Protect Your Information;
- No Personal Information Sold;
- California Privacy Rights;
- Changes to this Policy; and
- Questions, Concerns or More Information

## Personal Information We Collect

“Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household. It does not include anonymous or aggregated data that cannot be associated with an individual or household.

In the past 12 months, we may have collected the following **categories of Personal Information** about you, which we have grouped together as follows:

- Identifiers, such as name, data of birth, and government-issued identifier (e.g., driver’s license, Social Security number);
- Contact information, such as phone numbers, email address, postal address;
- Financial information, such as financial history, information from credit reference agencies and fraud prevention agencies;
- Characteristics of protected classifications under California or federal law, such as name, signature, sex, and marital status. Some information may overlap with other categories;
- Commercial information, such as personal property purchases and transaction information;
- Internet or network activity information, such as browsing history and interactions with our website and mobile app;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Sensory data such as audio, electronic, visual and similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer;
- Education information, such as student records and directory information; and

- Marketing and Communications Information such as marketing campaign data, click throughs, your preferences and consent in receiving marketing from us and our third parties, and your communication preferences.

Cookies and Tracking Technology. We use cookies and similar technologies on our websites, mobile apps, and emails. Cookies are text files that hold small amounts of information, which an individual's computer or mobile device stores when they visit a website or use a mobile app. When the individual returns to the websites or mobile apps – or visit websites and mobile apps that use the same cookies – they recognize these cookies and therefore the individual's device. FFB and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. For more information about cookies and about turning off cookies, please see: <http://www.allaboutcookies.org>. If you turn off your cookies, some of the features of the Services may not function properly.

Do Not Track Browser Setting. Some web browsers incorporate a "Do Not Track" feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. At this time, we do not respond to browser DNT signals. Other third party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

## How We Collect Your Personal Information

The ***categories of sources*** from whom we collected this Personal Information are:

- Directly from a California resident consumer or that consumer's agent
- Service Providers, Consumer Data Resellers and other third parties
- Public Record Sources (Federal, State or Local Government Sources)
- Website or Mobile App Activity
- Third parties or institutions representing a client

## How We Share Your Personal Information

The ***categories of third parties*** we've disclosed Personal Information to in order to carry out the business purposes described in this privacy are:

- Service Providers to perform certain business services such as website hosting, information technology and related infrastructure, customer service, personalized products, postage and mail services, email delivery, legal advice, and auditing.
- Business Transactions in the event of any proposed reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- Government Agencies as required by laws and regulations.

- Legal Process, we may disclose information about you (i) if we are required to do so by law, regulation, or legal process such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.
- Parties with whom you instruct us to share, you may be presented with an option on our Service to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and all information you disclose will be subject to the third-party privacy policies and practices of such third parties.

## How We Use Your Personal Information

Our primary purpose for collecting Personal Information is to provide you with information, products, and services you request. We may also use your Personal Information for the following **business purposes**:

- To provide you with a product, service or information about a product or service that you request from us or which we believe may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To detect potentially malicious, deceptive, fraudulent or illegal activity on all aspects of the bank's digital and physical locations, and further mitigate, prevent, report or prosecute those responsible.
- As necessary or appropriate to protect the rights, property or safety of us, our customers or others.
- Debugging to identify and repair errors that impair existing intended functionality.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

## How We Protect Your Personal Information

We are committed to the privacy and security of information you provide to us for business purposes and beyond. We maintain physical, electronic, and procedural security safeguards to protect Personal Information we maintain against loss, alteration, access, or disclosure, and require service providers that have access to Personal Information do the same.

## No Personal Information Sold

In the past 12 months, we have not "sold" Personal Information, including Personal Information of minors under the age of 16. For purposes of this Policy, "sold" means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

## California Privacy Rights

This section describes your rights under the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Please note that privacy provisions of the CCPA do not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”) (e.g. Personal Information collected on consumers who apply for or obtain one of our financial products or services for personal, family or household purposes).

The CCPA provides California consumers the right to know about Personal Information collected, disclosed or sold. If you are a California resident, you have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
  1. the categories of Personal Information about you that we collected;
  2. the categories of sources from which the Personal Information was collected;
  3. the categories of Personal Information sold or disclosed to third parties;
  4. the categories of third parties with whom such Personal Information was sold or disclosed;
  5. the business or commercial purpose for collecting or selling Personal Information; and
  6. the specific pieces of Personal Information we collected about you;
2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception;
3. Opt-out from having your Personal Information sold to third parties (this is not applicable to us as we do not sell your Personal Information); and
4. Be free from unlawful discrimination for exercising your rights under the CCPA.

## How to Exercise Your Rights

If you are a California resident, you may submit a request by:

1. Emailing: [info@fresnofirstbank.com](mailto:info@fresnofirstbank.com)
2. Calling: (559) 439-0200
3. Visit one of our branches and request a Personal Information Rights Request form

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access twice within a 12-month period.

The verifiable consumer request must:

- Include your full legal name, email, and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal

Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Our Obligations

We will acknowledge the receipt of your request within 10 calendar days and provide additional information on our procedure for verifying your identity. In some instances, we may need additional information to verify your identity. If your request is being made on behalf of another person, we may require authorization and identify verification directly from the person for whom the request is being made.

We are prohibited from disclosing social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, and specific pieces of information that pose potential unauthorized access to an account or relationship through identity theft or fraud or similar act.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

## Other California Privacy Rights

California Civil Code Section 1798.83 permits California residents who have provided personally identifiable information to us or our third-party advertisers and marketing partners, if any, to request certain

information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. Requests should be submitted via email to [info@fresnofirstbank.com](mailto:info@fresnofirstbank.com) and should include CALIFORNIA PRIVACY RIGHTS in the subject line. We will need your first and last name, mailing address, and email address in order to process your request. Please be aware that not all information sharing is covered by the requirements of Section 1798.83 and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

### Changes to This California Consumer Privacy Act Disclosure

We may change or update this Policy from time to time. When we do, we will post the revised Policy on the FFB website with its effective revision date. Where changes to this Privacy will have a fundamental impact on the nature of how we collect, use, or share your Personal Information, we will give advance notice of such changes.

### Questions or Concerns or More Information

Should you have any questions or comments about the process, this disclosure or our practices, please contact us by:

1. Writing to us at: Fresno First Bank  
Attn: Privacy Right  
7690 N Palm Ave Ste 101  
Fresno, CA 93711
2. Emailing us at [info@fresnofirstbank.com](mailto:info@fresnofirstbank.com)