

California Consumer Privacy Act Disclosures

In these California Consumer Privacy Act Disclosures (“CCPA Disclosures”), we, Bank of the Orient and any members and affiliates of Bank of the Orient (collectively “**Bank of the Orient**” or “we”, “us” and “our”) disclose information about our data processing practices relating to consumers (collectively “you”, “your” and “yours” as well as “consumer”) as required by the California Consumer Privacy Act of 2018 (“CCPA”) and supplement the disclosures in any CCPA Notice at Collection issued in addition to the CCPA Notice at Collection Online provided in Section III below. These CCPA Disclosures are effective January 1, 2020.

Who and what information is subject to these CCPA Disclosures?

Residents of the State of California are protected as “consumers” by the CCPA with respect to their personal information. Information that is collected as we conduct our business operations may be subject to **statutory exceptions** that apply under the CCPA and to these CCPA Disclosures, including the following:

- Personal information that is part of a written or verbal communication or a transaction between us and the consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transactions with us occur solely to conduct due diligence regarding us, or to provide or receive a product or service to or from us, by the company, partnership, sole proprietorship, non-profit, or government agency.
- Personal information that we collect about a natural person who is acting as, or previously acted as, a job applicant seeking employment with us.
- Personal information we collect that represents emergency contact information of the natural person acting as, or previously acted as, a job applicant seeking employment with us, and used solely to maintain an emergency contact record.
- Personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

CCPA Notice at Collection Online

In this CCPA Notice at Collection Online, we are addressing disclosure requirements under California Civil Code §1798.100(b) and California Attorney General Regulations § 999.305 at or before the point of online collection: We collect the categories of personal information about consumers for the business and commercial purposes set out in our CCPA Privacy Policy.

CCPA Privacy Policy

Beyond the disclosures in the preceding “Notice at Collection Online” segment and any other Notice at Collection, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve months, as required by the CCPA and regulations of the California Attorney General, including §999.308 (Privacy Policy).

Right to Know About Personal Information Collected, Disclosed, or Sold

This CCPA Privacy Policy describes personal information we might generally collect, use, disclose and sell about California residents. You have the right to request that we disclose to you what personal information we collect, use, disclose and sell about you specifically (“right to know”). To submit a request to exercise the right to know, please submit an email request to **Bank of the Orient** at info@bankorient.com and include “California Request to Know” in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access. We will ask that you provide certain information to verify your identity, such as a code sent to an email address, we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Information We Collect

We have set out below categories of personal information we have collected about California residents in the preceding 12 months. For each category of personal information collected, we also indicate the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information:

PERSONAL INFORMATION OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Identifiers such as 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.	<p>Consumers who provide the information themselves and are the data subjects, or third parties such as employers, agents, professional advisors or others who have been duly authorized by the consumer to disclose data on behalf of the consumer</p> <p>Company-maintained databases</p> <p>Other publicly available databases</p> <p>Other private or proprietary third-party databases we are contractually and legally permitted to access</p>	<p>To provide banking advice, business, services and to respond to inquiries</p> <p>To manage our business operations and administer our client relationship</p> <p>To provide relevant marketing to you (e.g., information about events or services that may be of interest)</p> <p>To address compliance and banking obligations (e.g., checking identity of new customers, prevention of fraud/money laundering)</p> <p>To consider individuals for employment and contractor opportunities and manage on-boarding procedures</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

PERSONAL INFORMATION- INTERNET PROTOCOL ADDRESS			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Identifiers such as 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	<p>Clients or customers, job applicants and other third parties who are the data subjects</p> <p>Employees who are the data subjects</p> <p>Our affiliates, counterparties to transactions or disputes with the data subjects, employers, agents or professional advisers authorized to disclose data on behalf of the data subject and from other publicly available or subscription-based sources</p>	<p>Audio/visual information is retained where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed, or to transcribe or prepare a written note of client or employee interviews.</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

PERSONAL INFORMATION- OTHER			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Identifiers such as 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	<p>Clients or customers, job applicants and other third parties who are the data subjects</p> <p>Employees who are the data subjects</p> <p>Our affiliates, counterparties to transactions or disputes with the data subjects, employers, agents or professional advisers authorized to disclose data on behalf of the data subject and from other publicly available or subscription-based sources</p>	<p>Solely as strictly necessary for the purposes described regarding employee data and as otherwise required in connection with managing the employment relationship (e.g. sick leave, sick pay, accidents at work, other employment related claims, accommodating disability within the workplace, maternity leave, etc.)</p> <p>Solely to the extent required to comply with the banking or other best practice obligations imposed upon the bank (e.g. AML, equality laws, monitoring diversity and inclusion, etc.)</p> <p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related</p>

PERSONAL INFORMATION UNDER 1798.80(e) OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
<p>Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.</p> <p>"Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.</p>	The consumer who is the data subject; or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>To provide banking advice, business services and to respond to inquiries about the same</p> <p>To manage our business operations and administer our client relationship</p> <p>To provide relevant marketing to you (e.g., information about events or services that may be of interest)</p> <p>To address compliance and banking obligations (e.g., checking identity of new customers, prevention of fraud/money laundering)</p> <p>To consider individuals for employment and contractor opportunities and manage onboarding procedures</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related</p>

PERSONAL INFORMATION UNDER 1798.80(e) - INTERNET PROTOCOL ADDRESS			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
<p>Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.</p> <p>"Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.</p>	<p>Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.</p>	<p>Audio/visual information is retained where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed, or to transcribe or prepare a written note of client or employee interviews.</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>
PERSONAL INFORMATION UNDER 1798.80(e) - OTHER			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
<p>Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.</p> <p>"Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."</p>	<p>Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.</p>	<p>Solely as strictly necessary for the purposes described regarding employee data and as otherwise required in connection with managing the employment relationship (e.g. sick leave, sick pay, accidents at work, other employment related claims, accommodating disability within the workplace, maternity leave, etc.)</p> <p>Solely to the extent required to comply with banking or other best practice obligations (e.g. AML, equality laws, monitoring diversity and inclusion, etc.)</p> <p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

PROTECTED CLASS INFORMATION OF ALL CONSUMERS AND INDIVIDUALS, WHETHER MEMBERS OF THE PUBLIC OR THOSE WITH A CURRENT OR PROSPECTIVE EMPLOYMENT RELATIONSHIP WITH THE BANK

Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
<p>Characteristics of protected classifications under California or federal law (classes include race, color, religion, national origin, sex (including pregnancy, childbirth, and related medical conditions), disability, leave, age, citizenship status, genetic information, ancestry, breastfeeding, marital status, gender identity, gender expression, sexual orientation, medical condition including AIDS/HIV, political activities and affiliations, military and veteran status, and status as a victim of domestic violence, assault, or stalking).</p>	<p>Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.</p>	<p>Only collected if required by law or regulation and necessary for carrying out our business, including administering the client relationship, if any</p>	<p>Internet service providers</p> <p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

COMMERCIAL INFORMATION OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES

Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.</p>	<p>To provide banking advice, business services and to respond to inquiries relating to the same</p> <p>To manage our business operations and administer our client relationship</p> <p>To provide relevant marketing to you (e.g., information about events or services that may be of interest)</p> <p>To address compliance and banking obligations (e.g., checking identity of new customers, prevention of fraud/money laundering)</p> <p>To consider individuals for employment and contractor opportunities and manage on-boarding procedures</p> <p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

COMMERCIAL INFORMATION - INTERNET PROTOCOL			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>Audio/visual information is retained where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed, or to transcribe or prepare a written note of client or employee interviews.</p> <p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

COMMERCIAL INFORMATION - OTHER			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>Solely as strictly necessary for the purposes described regarding employee data and as otherwise required in connection with managing the employment relationship (e.g. sick leave, sick pay, accidents at work, other employment related claims, accommodating disability within the workplace, maternity leave, etc.)</p> <p>Solely to the extent required to comply with banking or other best practice obligations (e.g., AML, equality laws, monitoring diversity and inclusion, etc.).</p> <p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

ELECTRONIC INFORMATION OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>To provide banking advice, business, services and to respond to inquiries</p> <p>To manage our business operations and administer our client relationship</p> <p>To provide relevant marketing to you (e.g., information about events or services that may be of interest</p> <p>To address compliance and banking obligations (e.g., checking identity of new customers, prevention of fraud/money laundering)</p> <p>To consider individuals for employment and contractor opportunities and manage on-boarding procedures</p> <p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

ELECTRONIC INFORMATION - INTERNET PROTOCOL

Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>To make our website more intuitive and easier to use</p> <p>To protect the security and effective functioning of our website</p>	<p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

ELECTRONIC INFORMATION - OTHER			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>Solely as strictly necessary for the purposes described regarding employee data and as otherwise required in connection with managing the employment relationship (e.g. sick leave, sick pay, accidents at work, other employment related claims, accommodating disability within the workplace, maternity leave, etc.).</p> <p>Solely to the extent required to comply with the banks banking or other best practice obligations (e.g. AML, equality laws, monitoring diversity and inclusion, etc.).</p> <p>To make our website more intuitive and easier to use.</p> <p>To protect the security and effective functioning of our website.</p>	<p>Law enforcement, regulatory and government agencies</p> <p>Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services.</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

AUDIO VISUAL OTHER INFORMATION OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Audio, electronic, visual, thermal, olfactory, or similar information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>To provide banking advice, business, services and to respond to inquiries.</p> <p>To manage our business operations and administer our client relationship.</p> <p>To provide relevant marketing to you (e.g., information about events or services that may be of interest.</p> <p>To address compliance and banking obligations (e.g. checking identity of new customers, prevention of fraud/money laundering).</p> <p>To consider individuals for employment and contractor opportunities and manage on-boarding procedures.</p>	<p>Law enforcement, regulatory and government agencies Internet service providers</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

AUDIO VISUAL OTHER INFORMATION - INTERNET PROTOCOL			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Audio, electronic, visual, thermal, olfactory, or similar information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	Audio/visual information is retained where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed, or to transcribe or prepare a written note of client or employee interviews.	<p>Law enforcement, regulatory and government agencies Internet service providers</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

AUDIO VISUAL OTHER INFORMATION - OTHER			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Audio, electronic, visual, thermal, olfactory, or similar information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>Solely to the extent required to comply with the banks banking or other best practice obligations (e.g. AML, equality laws, monitoring diversity and inclusion, etc.).</p> <p>To make our website more intuitive and easier to use.</p> <p>To protect the security and effective functioning of our website.</p>	<p>Law enforcement, regulatory and government agencies Internet service providers</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

PROFESSIONAL OR EMPLOYMENT INFORMATION OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Professional or employment related information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>To provide banking advice, business, services and to respond to inquiries.</p> <p>To manage our business operations and administer our client relationship.</p> <p>To provide relevant marketing to you (e.g. information about events or services that may be of interest.</p> <p>To address compliance and banking obligations (e.g. checking identity of new customers, prevention of fraud/money laundering).</p>	<p>Law enforcement, regulatory and government agencies Internet service providers</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis,</p>

		To consider individuals for employment and contractor opportunities and manage on-boarding procedures.	payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.
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PROFESSIONAL OR EMPLOYMENT INFORMATION - INTERNET PROTOCOL

Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Professional or employment related information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	Audio/visual information is retained where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed, or to transcribe or prepare a written note of client or employee interviews.	<p>Law enforcement, regulatory and government agencies Internet service providers</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

PROFESSIONAL OR EMPLOYMENT INFORMATION - OTHER

Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Audio, electronic, visual, thermal, olfactory, or similar information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	<p>Solely to the extent required to comply with the banks banking or other best practice obligations (e.g. AML, equality laws, monitoring diversity and inclusion, etc.).</p> <p>To make our website more intuitive and easier to use.</p> <p>To protect the security and effective functioning of our website.</p>	<p>Law enforcement, regulatory and government agencies Internet service providers</p> <p>Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers.</p> <p>Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.</p>

EDUCATION INFORMATION OF CUSTOMERS, JOB APPLICANTS AND THIRD PARTIES			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	To provide banking advice, business, services and to respond to inquiries. To manage our business operations and administer our client relationship. To provide relevant marketing to you (e.g. information about events or services that may be of interest. To address compliance and banking obligations (e.g. checking identity of new customers, prevention of fraud/money laundering). To consider individuals for employment and contractor opportunities and manage on-boarding procedures.	Law enforcement, regulatory and government agencies Internet service providers Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.
EDUCATION INFORMATION - INTERNET PROTOCOL			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	Audio/visual information is retained where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed, or to transcribe or prepare a written note of client or employee interviews.	Law enforcement, regulatory and government agencies Internet service providers Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.
PROFESSIONAL OR EMPLOYMENT INFORMATION - OTHER			
Category	Source(s) Used to Collect Information	Purpose(s) for Collection	Third Parties with Whom we Shared
Audio, Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99), visual, thermal, olfactory, or similar information.	Source who provides it (the consumer); or company-maintained databases that include this information; or other publicly available or subscription-based third-party proprietary data sources.	Solely to the extent required to comply with the banks banking or other best practice obligations (e.g. AML, equality laws, monitoring diversity and inclusion, etc.). To make our website more intuitive and easier to use. To protect the security and effective functioning of our website.	Law enforcement, regulatory and government agencies Internet service providers Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, mailings, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing.

Disclosures of Personal Information, No Sale

Over the preceding 12 months, we disclosed certain categories of California residents' personal information to the categories of third parties as shown in the table above.

We do not and will not sell California residents' personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, please submit an email request to **Bank of the Orient** and include “California Request to Delete” in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all your personal information as required by the CCPA.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address, we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your personal information by a business. We do not, and will not, sell your personal information.

Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

Authorized Agent

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to Bank of the Orient; and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

For More Information If you have questions or concerns regarding our privacy policy or practices, you may contact us at: 233 Sansome Street San Francisco, CA 94104 or call us at 1-800-881-2686, Monday – Friday 9:00AM – 5:00PM PST.