

## **First General Bank's Online Notice**

### **California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) of 2020**

#### **BACKGROUND**

This policy describes how First General Bank handles personal information that is collected online or through its website and our sharing practices.

The CPRA requires that First General Bank disclose the following information relating to the Bank's collection and sharing practices including a description of the consumer's rights such as Right to Access, Right to Know, Right to Delete, the Right to Limit Use of Sensitive Personal Information, the Right to Correct, the Right to Opt-Out, and Right to Equal Service.

#### **I. RIGHT TO ACCESS**

A consumer has the right to request that a business that collects a consumer's personal information disclose to that consumer the categories and specific pieces of personal information the business has collected.

First General Bank does not have third-party affiliates. First General Bank does not share non-public personal information with non-affiliated third-parties except as permitted by law, for example, for everyday business purposes such as process your transactions, maintain your account (s), respond to court orders and legal investigations, or report to credit bureaus.

The chart below indicates how First General Bank collects personal information before or at the point of collection, the purposes for which the categories of personal information are used, and the companies which the Bank shares that information:

**A. COLLECTION OF PERSONAL INFORMATION (PI)**

Category of PI	Categories of Sources	Purposes	Shared With
<p>(General and Sensitive PI)</p> <p>Personal identifiers such as real name, alias, social security number, driver’s license number, or state identification card number, and passport numbers.</p> <p>Contact information such as postal address, unique personal identifier, online identifier, internet protocol address, email address, or other network activity information and emergency contact.</p> <p>Any information described in the California Civil Code section (1798.80 (e) that identifies, relates to, describes, or is capable of being associated with, a particular individual, including but not limited to, his or her physical characteristics or description, insurance policy number, education, employment, and employment history. “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>Characteristics of protected classifications under California or federal law.</p>	<p>From your deposit or loan account, loan application, and or use of your debit card.</p> <p>We also collect your personal information from other sources such as credit bureaus, consumer reporting agencies, public records, government agencies, and third-party service providers.</p> <p>Your new account application or loan application and or web inquiry.</p>	<p>Make a new loan or open a deposit account or service your account.</p> <p>To communicate with you.</p> <p>Responding to your inquiries.</p> <p>To communicate with you regarding change in terms and conditions, notices, inform you of new services, or alerts.</p> <p>Provide banks statements to you.</p> <p>Internal bank use.</p> <p>To process loan payments.</p> <p>To comply with regulatory obligations such as Bank Secrecy Act/Anti-Money Laundering procedures and or reporting.</p> <p>For employment related purposes.</p>	<p>All financial companies needed to share personal information to run their everyday business.</p> <p>Below, we list the companies we share consumer’s personal information:</p> <p>System processor to process your transactions, and maintain your accounts.</p> <p>Consumer reporting agencies for new account verification and report abused accounts,</p> <p>Check printing company for consumers with checking accounts.</p> <p>Appraisers – For appraisal services on loans.</p> <p>Escrow companies – Loan closing.</p> <p>Title Insurance Companies – Insurance of loans.</p> <p>Credit reporting agencies.</p> <p>Tax return verification companies.</p>

<p>Financial information such as bank account number, bank account name, account balance, payment history, credit history, credit card number, debit card number, credit scores, or other similar identifiers.</p> <p>Demographic information such as age, date of birth, gender, and ethnicity.</p> <p>Geographic location such as physical address, city and zip code.</p> <p>All information that identifies, relates to, a California resident sole proprietor or guarantors of commercial loans and authorized signers on business deposit accounts.</p> <p>Biometrics, professional, education, employment history or employment-related information. Professional or employment-related information from employees, job applicants, and contractors</p>			<p>Auditors – Independent Third-Party audit firms.</p> <p>Offsite storage of financial institution records.</p> <p>Upon your request.</p> <p>Also as permitted by law to respond to court orders and legal investigations by law enforcement agencies.</p>
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**B. INFORMATION THE BANK SELLS**

Information We Sell	Information We Disclose for a Business or Commercial Purpose
The Bank has not sold any PI in the preceding 12 months	The Bank has not sold any PI in the preceding 12 months.

The Bank does not sell any personal information to non-affiliated third parties.

The Bank provides the information to a consumer only upon receipt of a “verifiable consumer request”.

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us.”

## **II. RIGHT TO KNOW**

A consumer has the right to request that a business disclose personal information that it has about the consumer, including a request for any or all of the following:

1. The specific pieces of personal information that a business has about the consumer;
2. The categories of personal information it has collected about the consumer;
3. The categories of sources from which the personal information is collected;
4. The categories of personal information that the business sold or disclosed for a business purpose about the consumer;
5. The categories of third-parties to whom the personal information was sold or disclosed for a business purpose about the consumer; and
6. The business or commercial purpose for collecting or selling personal information

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us.”

## **III. RIGHT TO DELETE**

A consumer has the right to request that a business delete any personal information about the consumer which the business has collected from the consumer.

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us”.

## **IV. RIGHT TO OPT-OUT**

A consumer has the right, at any time, to direct a business that sells personal information about the consumer to third parties not to sell the consumer’s personal information. This right may be referred to as the right to opt-out.

The Bank has not sold any personal information in the preceding 12 months.

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us”.

## **V. RIGHT TO LIMIT USE OF SENSITIVE PERSONAL INFORMATION**

A consumer has the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer’s sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, or as otherwise permitted under the CPRA.

A business that uses or discloses a consumer’s sensitive personal information for purposes other than those permitted under the CPRA must provide notice to consumers that this information may

be used, or disclosed to a Service Provider or Contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.

The Bank discloses Sensitive Personal Information as permitted in its Privacy Policy and under permissible uses stated in the CPRA.

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us”.

## **VI. RIGHT TO CORRECT INACCURATE PERSONAL INFORMATION**

A consumer has the right to request a business that maintains inaccurate personal information about the consumer to correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us”.

## **VII. RIGHT TO NON-DISCRIMINATION**

The Bank does not discriminate against consumers for exercising their rights.

The Bank will not charge a different price, deny goods or services, or impose penalties on a consumer who exercises his or her rights.

Request or inquiry may be submitted as directed in the information provided in Section VIII under “Contact Us”.

### **Financial Incentive Notice**

According to the CPRA, a business would be permitted to offer certain financial incentives provided the different treatment is directly related to the value provided by the data and the business provides the consumer with a notice which discloses certain information regarding the financial incentive programs.

However, First General Bank does not offer incentives to consumers to sell their personal information.

## **VIII. CONTACT US**

To exercise your rights or if you have any questions regarding your personal information regarding this notice, please contact us as follows:

1. Telephone: Please call (626) 363-8878 Ext. 102 or
2. Contact us electronically at: [www.fgbusa.com](http://www.fgbusa.com); or
3. In writing or in person at:  
First General Bank  
1744 S. Nogales St., Suite A  
Rowland Heights, CA 91748

The Bank promptly delivers the information requested to a consumer free of charge within 45 days of receiving the consumer's verifiable request.

The Bank confirms receipt of a request within 10 days.

After a request has been verified, the Bank responds to requests within 45 days. The 45-day period begins on the day the Bank received the consumer's request. If necessary the Bank could take up to an additional 45 days to respond to the consumer's request for a maximum of total of 90 days from the day the Bank received the request, provided that we give the consumer an explanation of the reason that we will take more than 45 days to respond to the request.

## **IX. CHILDREN AND MINORS**

The Bank does not direct services to minors who are under 16 years of age. The bank does not sell the personal information without getting the minor or the parent's opt in.

## **X. VERIFICATION METHOD**

The Bank is only required to respond to a request upon of a "verifiable consumer request" and obtaining a consumer's consent.

Example:

- a) If the Bank maintains personal information in a manner associated with a name of a person (not a business), the Bank may verify the consumer by requiring the consumer to provide evidence that matches the personal information maintained by the Bank.
- b) If the Bank maintains personal information in a manner that is not associated with a name of a person (not a business), the Bank may verify the consumer by requiring the consumer to demonstrate that they are the sole consumer associated with the non-name identifying information.

The Bank uses a combination of the following information as a verification method to verify the consumer's identity:

- First and last name
- Account number
- Last four digits of the social security number (SSN)
- If consumer does not have an SSN then the last four digits of the consumer's account number need to be provided

If the Bank is unable to verify a consumer request, we may deny the request. The Bank must treat each request to delete as a request to opt-out.

The Bank may provide personal information to a consumer at any time, but is NOT required to provide personal information to a consumer more than twice in a 12-month period.

## **XI. RECORD RETENTION**

The Bank maintains records of the information it has collected for 24 months.

## **XII. CHANGES TO THIS NOTICE**

First General Bank reserves the right to amend this notice at any time. When this notice is updated or revised the “Last Revised” date will reflect on the top of this page.