

Poppy Bank California Consumer Privacy Act (CCPA) Online Privacy Policy

Effective: January 1, 2020

Last Updated: December 31, 2019

This notice is provided pursuant to the CCPA and explains how Poppy Bank collects, uses and discloses the Personal Information (PI) of California residents.

Information collected that is subject to the Gramm Leach Bliley Act (GLBA) does not apply to personal information under the requirements of the CCPA. In addition, personal information collected for business to business communication is currently exempt.

Introduction

A consumer has the right to request from a business that collects personal information about the consumer the following:

- The categories of personal information it has collected about that consumer.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom the business shares personal information.
- The specific pieces of personal information it has collected about that consumer.

A business that collects personal information about a consumer must disclose to the consumer the information specified above upon receipt of a verifiable consumer request from the consumer. Additionally, the business must associate the information provided by the consumer in the verifiable consumer request to any personal information previously collected by the business about the consumer and identify by category or categories the personal information collected about the consumer in the preceding 12 months by reference to categories enumerated in California Civil Code Section 1798.130(c) that most closely describes the personal information collected.

A consumer has the right to request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to that consumer:

- The categories of personal information that the business collected about the consumer.
- The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
- The categories of personal information that the business disclosed about the consumer for a business purpose.

A business that sells personal information about a consumer, or that discloses a consumer's personal information for a business purpose, must disclose the information specified above to the consumer upon receipt of a verifiable consumer request from the consumer. Additionally, the business must identify the consumer and associate the information provided by the consumer in the verifiable consumer request to any personal information previously collected by the business about the consumer and identify by category or categories the personal information of the consumer that the business sold in the preceding 12 months by reference to the categories enumerated in California Civil Code Section 1798.130(c) that most closely describe the personal information, and provide the categories of third parties to whom the consumer's personal information was sold in the preceding 12 months by reference to the same enumerated categories. The business shall disclose the information in a list that is separate from a list generated for the purposes of California Civil Code Section 1798.130(c).

Poppy Bank Collection and Disclosure of Personal Information

Poppy Bank has not sold PI collected in the preceding 12 months to any third party.

Poppy Bank collects and discloses the following categories of information for business purposes: Name, address, tax ID number, driver license, passport or ID card number, date of birth, telephone number, email address, bank account number, other financial information, dependent/beneficiary PI, benefit elections, internet or other electronic network activity including IP address, geolocation, browsing history and website interaction.

Poppy Bank collects PI from a variety of sources including: directly from you in credit applications, deposit applications, employment applications and from your devices when you visit poppy.bank or our social media webpages.

Poppy Bank collects PI for a range of purposes including: validating identification, communication with you, processing payroll, processing financial transactions, offering employment benefits, tracking benefit eligibility, target marketing and personalizing advertising that may be of interest to you.

Poppy Bank shares PI collected with our processors and vendors who provide services on our behalf.

CCPA Rights

California residents have the right to request that Poppy Bank disclose the PI we have collected, used and disclosed to our service providers.

California residents also have the right to request that their personnel information be deleted. Note: We may deny a request to delete if an exception applies or if we are unable to determine or confirm the identity of the person making the request. Poppy will advise you in our response if we are unable to honor your request.

To make a request for information collected and disclosed or to make a request to delete PI please call: 888.636.9994 or write to us at:

Poppy Bank
438 First Street
Attention: Compliance Department
Santa Rosa, CA 95401

Please identify which privacy right(s) you would like to exercise, include your name, address and a detailed description of your current or previous relationship with Poppy Bank.

Poppy will process requests within 30 days.

Non-Discrimination

Poppy Bank shall not discriminate against a consumer because the consumer exercised any of the consumer's rights under the California Consumer Privacy Act (California Civil Code Section 1798.100 et seq.), including, but not limited to, by:

- Denying goods or services to the consumer.
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services to the consumer.
- Suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.

Nothing in California Civil Code Section 1798.125(a) prohibits a business from charging a consumer a different price or rate, or from providing a different level or quality of goods or services to the consumer, if that difference is reasonably related to the value provided to the consumer by the consumer's data.

Changes to the CCPA Privacy Policy

Changes to this policy may be made at any time. When changes are made, the revised Policy will be posted to poppy.bank and will include a new "Effective" date.

If you have questions regarding your rights under the CCPA, please call us at: 888.636.9994.