



California Consumer Privacy Act Disclosure and Policy

Your privacy is important to us. First Northern Bank is committed to maintaining the security of the personal information of California consumers. This Disclosure and Policy explains how First Northern Bank collects, uses, and discloses personal information relating to California residents covered by the California Consumer Privacy Act 2018 (“CCPA.”)

Under the CCPA, “Personal Information is defined as: information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA.”)

The specific Personal Information we collect, use and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure and Policy does not apply with respect to information that we collect about California residents who apply for or obtain our financial products for personal, family, or household purposes. For more information about how we collect, disclose and secure information related to these customers, please refer to our [Consumer Privacy Notice](#) and our [Online Privacy Notice](#), which may be found online at thatsmybank.com/privacy.

CATEGORIES OF INFORMATION WE COLLECT

In the past 12 months, we have collected, used and disclosed to third parties for business purposes, the following categories of Personal Information relating to California residents covered by this Disclosure and Policy:

- Identifiers, such as name, alias and government issued identifier such as Social Security Number, Driver’s License Number, and Passport Number;
- Personal Information, such as contact information (e.g. address, telephone number, email address);
- Personal financial information, such as payroll stubs, personal financial statement, tax returns, records of personal property, real estate owned and business interests.
- Characteristics of protected classifications such as marital status and sex;

- Commercial information such as transaction information and purchase history;
- Biometric information, such as fingerprints and voiceprints;
- Internet or Network activity information, such as browsing history and interactions with our Bank website;
- Geolocation data, such as device location and Internet Protocol (IP) address;
- Audio and visual recordings, such as recorded call information and Branch Office/ATM video camera recordings;
- Professional or employment-related information, such as work history, professional designations and prior employer;
- Education information, such as student records; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

SOURCES FROM WHICH WE OBTAIN INFORMATION THIS PERSONAL INFORMATION

- Information you provide to us when applying for a loan or opening a deposit account, or any related services;
- Information from service providers such as third-party identification services, consumer data resellers and other third parties
- Information received from credit reporting agencies;
- Information from search engines, including social media, mobile app activity and website
- Information from Corporate Customers about individuals associated with those Corporate Customers, such as their employees and owners;
- Information from Customer directed third parties, such as CPAs and attorneys.
- Job Application with us, and;
- Government entities

SHARING OR DISCLOSING OF THIS PERSONAL INFORMATION

We share (disclose) information only with those vendors providing servicing of your products and services, and require they not sell, share, or use your information for any other purpose.

The categories of with whom we have share this Personal Information include:

- Vendors and Service Providers who provide services, such as data analysis, payment processing, information technology and related infrastructure, customer service, email delivery, auditing, credit card issuance, marketing and marketing research.
- Third Parties who provide services such as investment products, credit cards, payment, banking and communication infrastructure, storage, legal expertise, auditors.
- Government Agencies, as required by laws and regulations.

USE OF THE PERSONAL INFORMATION WE COLLECT

In the past 12 months, we have used Personal Information related to California residents to operate, manage and maintain our financial services business and to provide our products and services. The categories of uses include:

- To approve or decline loan or deposit account applications;
- To service the products and services you have with us;
- To consider your job application for hiring;
- To provide institution risk analysis and risk mitigation from consultants and auditing firms.
- To provide advertising and marketing services, and;
- To detect security incidents.

SELLING OF INFORMATION

We have and may in the future sell information from certain commercial loans, as necessary to provide you with the loan. This would include:

- Your name, address, and phone number
- Your taxpayer identification number
- Your financial information

TO OPT-OUT OF THE SELLING OF INFORMATION

Contact us at (877) 362-6000 and ask for the CCPA Service Officer, [click here](#) to complete a Individual Rights Request Form (choose Opt-Out,) or visit our website at www.thatsmybank.com/privacy.

YOUR RIGHTS UNDER THE CCPA

You have the right to:

- Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - The categories of Personal Information we have collected about you;
 - The categories of sources from which the Personal Information was collected;
 - The purpose for collecting Personal Information about you;
 - The categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that were disclosed (if applicable) and the purpose for the disclosing that Personal Information.

You may obtain our CCPA Notice at Collection Disclosure by:

1. [clicking this link](#), or
2. visiting our website at www.thatsmybank.com/privacy.

- Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
- Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge your request within 10 calendar days and respond to your request within 45-days as required by law. If we need an extension of up to 45 additional days, we will notify you and tell you why.

If you submit a request on behalf of another person, we may require proof of your authorization to make a request, directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another person. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect another person or where the Personal Information, we maintain about you is not subject to the CCPA's access or deletion rights.

We will notify you in our response if we are unable to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, account passwords or security questions and answers, if the disclosure of information presents the possibility of unauthorized access that could result in identity theft or fraud.

HOW TO EXERCISE YOUR RIGHTS

You may submit a request by:

1. Completing an online [Individual Rights Request Under CCPA](#)
2. Calling 1 (877)362-6000 and asking to make a, Individual Rights Request under CCPA.
3. Visiting a First Northern Branch Office and asking to make an Individual Rights Request under CCPA.

QUESTIONS OR CONCERNS

You may contact us with questions or concerns about this Disclosure and Policy and our practices by:

1. Writing to us at:
First Northern Bank
P.O. Box 547
Dixon, CA 95620
Attention: CCPA Information
2. Emailing us as: CCPA@thatsmybank.com

CHANGES TO THIS CALIFORNIA CONSUMER PROTECTION ACT NOTICE AND DISCLOSURE

We may change or update this Disclosure from time to time. When we do, we will post the revised Disclosure and Policy on this page with a new “Last Updated” date.

LAST UPDATED 1/1/2020