



FIRST NORTHERN BANK

California Consumer Privacy Act Disclosure Notice **for Customers, Potential Customers and Other Consumers**

First Northern Bank (“Bank”) is committed to maintaining the security of your personal information. This Disclosure Notice explains how the Bank collects, uses, and discloses personal information relating to **California residents** covered by the California Consumer Privacy Act 2018, as amended by the California Privacy Rights Act (“the CCPA”). You are considered a California resident if you currently reside in California or resided in California for 6 or the past 12 months.

If you are a Bank Employee, Job Applicant, Director or Independent Contractor, First Northern Bank maintains a separate CCPA Disclosure Notice and Policy concerning our collection, use and maintenance of your Personal Information. You may find this policy on myNet at Human Resources/Privacy Policy.

Under the CCPA, “personal information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This information is referred to in this Notice as “Personal Information.” The CCPA, however, does not apply to certain information that we collect, use, and disclose related to a consumer under the Gramm-Leach-Bliley Act (“GLBA”) and its implementing regulations, the California Financial Information Privacy Act, publicly available information from government records or the media; deidentified or aggregated information; or other information excluded from the CCPA’s scope.

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 the web address shown or by clicking on the following link: www.thatsmybank.com/privacy-policy.html.

PERSONAL INFORMATION WE COLLECT

We collect Personal Information in a variety of contexts. For example, we collect Personal Information to provide financial products and services, for our human resource, and vendor management purposes. The Personal Information that we collect about a specific California resident will depend on, for example, our relationship or interaction with that individual. For each category of personal information, we have provided examples of the personal information specifically collected, and the sources of that information.

During the past 12 months, we have collected the following categories of Personal Information. Some Personal Information may overlap into more than one category.

| Personal Information Category | Examples – Some pieces of Personal Information May Be Shown in More Than One Category | Retention Period |
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| Personal Identifiers | 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, physical characteristic or description, signature, driver’s license number or state identification number, medical information or health insurance information, or other similar identifiers. | Date of last transaction plus 5 years |
| Contact Information | Home, postal or mailing address, email address, home phone number, cell phone number | Date of last transaction plus 5 years |
| Account Information | Username and password for Bank accounts and systems, and any required security or access code, password, or security questions, allowing access to your Bank accounts. Bank account number, balance and activity, credit card number, debit card number. Online or mobile banking usage history, or any other financial information. | Username: permanent; Password or security code: while in use + 1 year; all other: Date of last transaction plus 5 years. |
| Personal Financial Information | Payroll stubs, personal financial statements, tax returns, records of personal property, real estate owned and business interests | Date of last transaction plus 5 years |
| Application Information | Information provided in an application for a loan, deposit account or deposit account services; proposal for services, information gathered as part of application evaluation and credit checks and other assessments and voluntary disclosures provided to Bank | 3 years after decline, withdrawal, non-acceptance of closure due to not having enough information |
| Protected classification characteristics under California or federal law | Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, immigration status, veteran or military status, genetic information (including familial genetic information). | Date of last transaction plus 5 years |
| Commercial information | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | Date of last transaction plus 5 years |
| Internet Activity Information | Browsing history of our Bank website; Other interactions through our website such as emails and other inquiries. | Browsing history: NOT collected at this time Other interactions: 5 years after last transaction |

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| Biometric information | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | NOT collected at this time |
| Geolocation data | Physical location or movements, such as device movement. | During use of device while on Bank Apps. Not currently retained. |
| Audio and Visual Information and Recordings | Your image when recorded or captured in surveillance camera footage or pictures taken of you at a Bank facility, function, or event, or in pictures or video posted on social media to which the Bank has access or that are submitted to the Bank by a third party. | Surveillance video – 90 days; Photos at Bank facility, function, or event you have authorized us to use – Permanent |
| Professional or employment related Information | Such a work history, professional designations, or prior employer, | Date of last transaction plus 5 years |
| Inferences drawn from other personal information | Inferences based on information about an individual to create a summary about a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | Date of last transaction plus 5 years |
| Sensitive Personal Information as permitted by Law | Social Security Number, driver’s license, state identification card or passport number; account log-in, financial account or debit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, citizenship or immigration status; the contents of mail, email and text messages unless we are the intended recipient of the communication; biometric information processed to uniquely identify an individual; and, health information, sexual orientation. | Date of last transaction plus 5 years, or (where contract exists), contract term plus 5 years, whichever is later |

Personal information **does not** include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public, whether by you or from widely distributed media.
- Information made available by a person to whom you have disclosed the information if you have not restricted the information to a specific audience.
- De-identified or aggregated information.

SOURCES FROM WHICH WE OBTAIN INFORMATION THIS PERSONAL INFORMATION

The sources from which we collect Personal Information depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Information in different contexts.

- Information you (a California resident) provide directly to us, or someone acting on your behalf provides to us when applying for a loan or opening a deposit account, or any related services or applying for or maintaining employment. For example, physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website, social media) sources;
- From your Device or use of our Services, (e.g., from observing your actions on our website, device fingerprinting or similar technologies.)
- Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, and local government entities.
- Outside companies or organizations from whom we collect Personal Information to support human resource and workforce management activities. Examples may include social media and background check vendors.
- Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing. Examples may include internet service providers, social networks, operating systems and platforms, data brokers, credit reporting agencies, advertising networks, third-party identification services and data analytics providers;
- 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, and
- Job Application with us and other employment documents completed by you.

HOW WE MAY USE YOUR PERSONAL INFORMATION

The purposes for which we collect, use, and disclose personal information depend on, among other things, our relationship or interaction with a specific California resident. The table below lists the purpose for which we collect, use and disclosure Personal Information in different contexts.

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Complying with laws and regulations and complying with other legal processes and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes, or opinions).
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- Auditing related to a current interaction and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.

- Support employment, infrastructure, and human resource management

CATEGORIES OF THIRD PARTIES AND OUR DISCLOSURE OF PERSONAL INFORMATION FOR BUSINESS PURPOSES

The categories of third parties to whom we disclose Personal Information about a specific individual depend on, among other things, our relationship or interaction with a specific California resident. Such third parties include:

- Outside companies or organizations, including Vendors and Service Providers subject to appropriate confidentiality and use restrictions, to whom we disclose Personal Information as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples may include such as data analysis, payment processing, information technology and related infrastructure, customer service, email delivery, auditing, credit card issuance, marketing, marketing research and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.
- Outside companies or organizations who provide services such as investment products, credit cards, payment, banking and communication infrastructure, storage, legal expertise, auditors.
- Companies or individuals that represent California residents such as an accountant, financial advisor, or person holding power of attorney on behalf of a California resident
- Government agencies including to support regulatory and legal requirements
- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we provide Personal Information to support human resource activities and workforce management. Examples may include operating systems and platforms and data analytics providers
- Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties
- Outside companies, in connection with online advertising activities prior to January 1, 2023

The table below shows, for each Personal Information category we have collected, the categories of third parties to whom we disclosed for our business purposes information from that Personal Information category during the preceding 12 months. The table below contains brief descriptions of the categories of Personal Information and third parties. Full descriptions of the categories of Personal Information and third parties are available above.

| Personal Information Type | Third Party Category to Whom We Disclosed Personal Information for Business Purposes |
|---------------------------|--|
| Personal Identifiers | <ul style="list-style-type: none"> • Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management or development • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting |
| Contact Information | <ul style="list-style-type: none"> • Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development |

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| | <ul style="list-style-type: none"> ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Account Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Personal Financial Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Application Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Protected classification characteristics under California or federal law | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Internet or Online Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Biometric Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Outside organizations in connection with human resource activities and workforce management |
| Geolocation Data | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Audio and Visual Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies |

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| | <ul style="list-style-type: none"> ● Outside organizations in connection with human resource activities and workforce management |
| Professional or Employment Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Inferences | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |
| Sensitive Personal Information | <ul style="list-style-type: none"> ● Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ● Government agencies ● Outside organizations in connection with human resource activities and workforce management ● Outside companies in connection with routine or required reporting |

DATA RETENTION

We will keep Personal Information no longer than necessary to fulfil the purposes described in this Notice. Under our record retention policy, we are required to destroy Personal Information after we no longer need it according to specific retention periods. However, we may need to hold Personal Information beyond these retention periods due to regulatory requirements or in response to a regulatory audit, investigation, or other legal matter. These requirements also apply to our third-party service providers. We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

SELLING OF INFORMATION

The CCPA defines a “sale” as the disclosure of Personal Information for monetary or other valuable consideration. Bank does not sell and has not, within at least the last 12 months, sold Personal Information, including Sensitive Personal Information that is subject to the CCPA’s sale limitation. As of January 1, 2023, we do not share Personal Information for cross-context behavioral advertising within the scope of CCPA. We have no actual knowledge that we sell or share Personal Information of California residents 16 years of age and younger.

YOUR RIGHTS UNDER THE CCPA

You have the Following rights:

- **Right to Know:** 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; and,
 - The specific pieces of Personal Information we have collected
- **Right to Correct:** Request we correct inaccurate Personal Information that we maintain about you;
 - **Right to Delete:** Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and,
 - **Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights:** Be free from unlawful discrimination for exercising your rights under the CCPA.

Only you or an authorized agent 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. The bank must be able to validate your authorization.

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 form by clicking on this link: [Privacy Act Request Form](#). Or, you may visit our website at https://www.thatsmybank.com/applications/privacy-act-request-form.html?step=k_9810330.
2. You may call 1 (877) 362-6000, Monday through Friday from 8:00 am until 5:00 pm Pacific Time. and ask to make a Privacy Act Request under the CCPA.

We will ask you to provide the following information to identify yourself: Name, contact information, social security or individual taxpayer identification number, date of birth, and will identify you by reviewing your personal identification (driver’s license or matricular card) or ask you other identifying questions.

When you make a Request to Know, Delete or Correct, we will attempt to verify that you are who you say you are. For example, we will attempt to match information you provide in making your Request with other sources of similar information to reasonably verify identity.

RESPONDING TO REQUESTS

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Information that we collect, use, and disclose. When these other laws apply, Personal Information may be exempt from, or outside the scope of, a request to Know, Delete, or Correct. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability, is exempt from CCPA Requests. As a result, we may decline all, or part of your Request related to exempt Personal Information. This means that we may not provide some, or all, of this Personal Information when you make a Request to Know. Also, we may not delete or correct some, or all, of this Personal Information when you make a Request to Delete or Correct.

As examples, our processing of or response to a Request to Know, Delete, or Correct may not include some or all of the following Personal Information:

- **Consumer Accounts.** Personal Information connected with consumer accounts used for personal, family, or household purposes. We have other privacy notices providing certain information on our use and sharing of this data, for example, the [First Northern Bank Consumer Privacy Notice](https://www.thatsmybank.com/privacy-policy.html), available at www.thatsmybank.com/privacy-policy.html.

The types of Personal Information described above are examples. We have not listed all types of Personal Information that may not be included when we respond to or process Requests to Know, Delete, or Correct.

In addition to the above examples, we may not include Personal Information when we respond to or process Requests to Know, Delete, or Correct when the CCPA recognizes another exception. For example, we will not provide the Personal Information about another individual when doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Information when it is necessary to maintain that Personal Information to comply with a legal obligation.

We will verify and respond to your request consistent with applicable law, considering the type and sensitivity of the Personal Information subject to the request.

AUTHORIZED AGENTS

If you are a California resident, you may authorize an agent to make a request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by using the submission methods listed above under "How To Make Requests." As part of our verification process, we may request that you provide, as applicable:

- For an individual ("requestor") making a request on behalf of a California resident: :
 - The requestor's name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, State ID, or Matricula Card.
 - The name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, State ID, or Matricula Card of the California resident on whose behalf the request is being made.

- A document to confirm that the requestor is authorized to make the request. We may accept, as applicable, a signed permission by the California resident on whose behalf the request is made, copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.
- For a company or organization (“legal entity requestor”) making a request on behalf of a California resident:
 - The legal entity requestor’s active registration with the California Secretary of State.
 - Proof that the California resident has authorized the legal entity requestor to make the request. We accept as applicable, a signed permission by the California resident on whose behalf the request is made, copy of power of attorney, or legal guardianship or conservatorship order.
 - The name; contact information; Social Security or individual taxpayer identification number; data of birth; and driver’s license, state ID, or matricula card of the California resident on whose behalf the request is being made. From the individual who is acting on behalf of the legal entity requestor, proof that the individual is authorized by the legal entity requestor to make the request. We accept a letter on the legal entity requestor’s letterhead, signed by an officer of the organization.

DEIDENTIFIED INFORMATION

Where we maintain or use deidentified information, we will continue to maintain and use the deidentified information only in a deidentified fashion and will not attempt to re-identify the information.

NOTICE AT COLLECTION

You will be provided with a notice each time we request Personal Information from you. You may view the First Northern Bank Notice at Collection by [clicking on this link](#), or find it at www.thatsmybank.privacy-policy.

QUESTIONS OR CONCERNS

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

1. Writing to us at: First Northern Bank, P.O. Box 547, Dixon, CA 95620, Attention: CCPA Information, or
2. Emailing us at: CCPA_Officer@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 7/1/2023