



Golden Valley Bank California Consumer Privacy Act (CCPA) Privacy Policy

Date last updated: March 10, 2021

Your privacy is important to us at Golden Valley Bank. We are committed to protecting the security and privacy of the personal information of our customers.

This policy describes the personal information that Golden Valley Bank (“we” or “us”) collects in the course of its business, explains how this information is collected, used, shared, and disclosed, describes rights provided by the California Consumer Privacy Act (“CCPA”) to California residents (“consumers” or “you”) regarding their personal information, and explains how consumers can exercise those rights.

Please note that, as a financial institution, most of the information we collect from you is exempt from disclosure because it is covered by or collected under the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, or other exemptions provided in the CCPA.

The California Consumer Privacy Act only applies to information about California residents that is collected in the past 12 months. If you are not a California resident or an authorized agent submitting a request on behalf of a California resident, you will not be able to submit a request.

It is the policy of Golden Valley Bank to comply with the following provisions of the California Consumer Privacy Act:

Categories of Personal Information that We Collect

The Personal Information that we collect about a specific California resident will depend on our relationship or interaction with the individual, examples being; products, services or employment and human resource purposes.

Below is a list of categories of personal information and examples for each category that we may have collected during the past 12 months.

- **Personal Identifiers** — Personal unique identifiers, such as full name and federal or state issued identification numbers including Social Security number, driver’s license number, and passport number
- **Personal Information** — Personal information, including contact details such as telephone number and address, financial information such as account number and balance, payment card details including credit and debit card numbers, as well as medical and health insurance information
- **Characteristics of Protected Classes** — Characteristics of protected classes or groups under state or federal law, such as sex or marital status Race, Citizenship, Veterans or Military Status
- **Purchase Information** — Purchase information, such as products and services obtained and transaction histories
- **Biometric Information** — Biometric information, such as fingerprints and voiceprints
- **Internet or other similar network activity** — Browsing history, search history, information regarding interaction with our websites, applications, or advertisements
- **Geolocation Data** — Geolocation data, such as device location, physical location or movements
- **Audio and Visual Information** — Audio, electronic, visual, olfactory, or similar information such as call and video recordings

- **Employment Information** — Professional or employment-related information, such as work history and prior employer
- **Education Information** — Education information, such as school and related information; and
- **Inferences** — Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics

Sources of Personal Information Collected

We Collect personal information about you from several sources. Below is a list of sources we may use to collect information about you but is not limited to the following:

- Information you provide to us when applying for or opening a deposit account, loan or any other bank service;
- Information received from a credit reporting agencies;
- Information from third-party verification services;
- Website/browser activity, Internet search engines, mobile activity and social media;
- Job application with us;
- Public Records Sources (Federal, State and Local Government);
- Government entities;
- Outside companies or organizations to provide data to support activities such as fraud prevention

Purpose of Collecting Personal Information

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

- Customer Service and Transactions - To approve or decline applications for loans, deposit accounts and other bank services, online banking access, service products and services you have with us;
- Bank Operations - To perform account monitoring, audit, investigation, reporting, detecting security incidents, protecting against malicious, deceptive fraudulent or illegal activities, risk analysis and mitigation
- Marketing and service updates – To provide marketing and/or advertisements to you for our products and services and to inform you of product service updates.
- Regulatory and Legal Compliance – To comply with federal and state laws, rules and regulations. Respond to and provide information required by federal and state legal actions, civil request, subpoenas, warrants and other legal requests for information.
- Employment and Human Resources management - To consider your application for employment; to complete the hiring and onboarding of new employees; and as part of an employee's relationship;

Categories of Third parties and Our Disclosure of Personal Information

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. During the past 12 months, we have disclosed for our business purposes the eleven categories of personal information listed above to the following categories of third parties:

- A. Outside companies or organizations, including 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 internet service providers, social networks, operating systems and platforms and financial institutions;
- B. 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.
- C. Government agencies, including to support regulatory and legal requirements
- D. 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.
- E. Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties.

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. The table below contains briefer descriptions of the categories of personal information and third parties. The full descriptions of the categories of personal information and third parties are available above.

Categories of Personal Information Disclosed for a Business Purpose	Categories of Third Parties to Whom the Personal Information was Disclosed
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 and development • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting
Personal Information	<ul style="list-style-type: none"> • Outside organizations in connection with providing products and services, completing

	<p>transactions, supporting our everyday operations, or business management and development</p> <ul style="list-style-type: none"> • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting
Characteristics of Protected Classes	<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 • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting
Purchase 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 • Representatives of California residents • 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
Internet or other similar network activity	<ul style="list-style-type: none"> • Outside organizations in connection with providing products and services, completing transactions, supporting our everyday

	<p>operations, or business management and development</p> <ul style="list-style-type: none"> • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting
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 • Representatives of California residents • 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 • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management
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 • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting

<p>Education Information</p>	<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 • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting
<p>Inferences</p>	<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 • Representatives of California residents • Government agencies • Outside organizations in connection with human resource activities and workforce management • Outside companies in connection with routine or required reporting

Right to Opt-Out of the Sale of Personal Information

California residents have the right to Opt-out of the sale of their personal information by businesses that sell personal information. We do not offer an Opt-out from the sale of personal information because we do not and have not within the last 12 months sold personal information.

Sale of Personal Information

We do not sell any personal information of our customers, nor do we sell or have actual knowledge that we have sold personal information of California Residents 16 years of age and younger.

The Right to Know About Personal Information Collected, Used, or Disclosed

You have the right to request that we provide you with certain information about the personal information we collect, use, retain or disclose about you as well as the categories and specific pieces of information that we have collected about you in the past 12 months. Specifically, you have the right to request the following information provided it is not exempt from the CCPA as discussed above:

- The categories of personal information we have collected about you.
- The categories of sources from which we have collected personal information about you.
- The business or commercial purpose for collecting your personal information.
- The business or commercial purpose for disclosing the category of personal information about you.
- The specific pieces of personal information we have about you.
- If we disclosed your personal information for a business purpose:
 - The categories of personal information that we disclosed about you for a business purpose; and
 - The categories of third parties to whom your personal information was disclosed for a business purpose, and which category of personal information was disclosed to that third party.

A household may request to know household personal information by submitting a verifiable consumer request to know. Also, if all consumers in a household jointly request access to specific pieces of information for the household, and we can individually verify the identity of all members of the household, that all consumers in the household are included on the request and that each member making the request is currently a member of the household, then we will comply with the request.

Information we will not disclose

We are prohibited by law from disclosing specific pieces of personal information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of that personal information, your account, or the security of our business systems or networks.

We are also prohibited by law from disclosing specific pieces of personal information about you in our response to a Right to Know, Right to Request Deletion and authorized agent requests. Listed below are the pieces of your personal information we will not disclose in fulfilling your requests:

- Your social security number;
- Driver's license number or other government-issued identification number;
- Financial account number;
- An account password or security questions and answers; and

- Any health insurance or medical identification number (if we have it).

Instructions for Submitting a Verifiable “Right to Know” About Personal Information Collected, Used, or Disclosed

To exercise your Right to Know, please submit to us a verifiable consumer Right to Know by either:

- Visiting <https://goldenvalleybank-requests.my.onetrust.com/webform/cca7247b-54b7-4f13-8cfb-71f6bb319d4b/4e062dba-4449-4282-8f41-43d599eda0bb>. complete all required fields and click the submit button.
- Calling us at **1-888-914-9661**. **PIN# 719463** please complete all prompts and include your call back phone number for verification purposes.
- In-person or by mailing your request to: **Golden Valley Bank, 190 Cohasset Road, suite 170, Chico, CA 95926**. Please include your call back phone number for verification purposes.

You may designate an authorized agent to make a request on your behalf using the same process above. If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request to know, you must:

- Provide the authorized agent with written permission to do so; or

The agent must provide a document that confirms the authorized agent has the authority to make the request on your behalf such as:

- A power of attorney, legal guardianship or conservatorship.

You will need to verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

Only you (or an authorized agent) may make a verifiable consumer request for your personal information and you (or an authorized agent) may make a verifiable consumer request on behalf of your minor child.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

Additionally we may deny your request to know for a number of different reasons, including for the reasons identified above in the “Information we will not disclose” section and in the CCPA.

The Process We Use to Verify Your “Right to Know” About Personal Information Collected, Used, or Disclosed

- If you are our customer and have an account with us, we will verify your identity through our existing authentication practices for your account. If we suspect fraudulent or malicious activity related to your

account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person we have collected the personal information from.

- Non-Customer or Non-Account Holders: If you are not a customer or do not hold an account with us, we will verify you as follows:
 - If you submit a Right to Know the categories of personal information, you will need to provide us with your name, address and contact phone number, which we will process to verify your identity.
 - If you submit a Right to Know specific pieces of personal information, you will need to provide us with your name, address and contact phone number, which we will process to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that you are the consumer whose personal information is requested. If you submit a request on behalf of your minor child, you will also be required to submit affirmation that you are the child's parent or legal guardian.

We will generally avoid requesting any additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud prevention purposes. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA or other applicable law.

Generally, if we are unable to verify your identity, we will inform you and explain why we were unable to do so.

Our Response to Your “Right to Know” About Personal Information Collected, Used, or Disclosed

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 business days and provide you with additional information about how we will process the request. Our goal is to respond to your request within 45 calendar days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 calendar days total) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take more than 45 calendar days to respond. Any disclosures we provide will cover the 12-month period preceding our receipt of your request. If we are unable to comply with a given request, we will provide you with a response explaining why we have not taken action on your request and identifying any rights you may have to appeal the decision.

We will not charge you to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may refuse to act on your request to know if, for example, it is unfounded or excessive, if we cannot verify your identity or the authority of your agent, or because of a conflict with federal or state law, and if so, we will let you know.

The “Right to Request Deletion” of Personal Information

You have the right to request that we delete your Non-Exempt Personal Information that we have collected and maintained. A household may request the deletion of household, Non-Exempt Personal Information by submitting a verifiable consumer request. If all consumers in a household jointly request deletion of household, Non-Exempt Personal Information, and we can individually verify the identity of all the members of the household, that all consumers in the household are included on the request and that each member making the request is currently a member of the household, then we will comply with the request.

This right does not apply to Business Consumers.

Instructions for Submitting a Verifiable “Right to Request Deletion” of Personal Information

To exercise your Right to Request Deletion, please submit a verifiable consumer request to us by either:

- Visiting <https://goldenvalleybank-requests.my.onetrust.com/webform/cca7247b-54b7-4f13-8cfb-71f6bb319d4b/4e062dba-4449-4282-8f41-43d599eda0bb>. Complete all required fields and click the submit button.
- Calling us at **1-888-914-9661**. **PIN# 719463** please complete all prompts and include your call back phone number for verification purposes.
- In-person or by mailing your request to: **Golden Valley Bank, 190 Cohasset Road, suite 170, Chico, CA 95926**. Please include your call back phone number for verification purposes.

You may designate an authorized agent to make a request on your behalf using the same process above. If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request to delete personal information, you must:

- Provide the authorized agent with written permission to do so; or

The agent must provide a document that confirms the authorized agent has the authority to make the request on your behalf such as:

- A power of Attorney, legal guardianship or conservatorship.

You will need to verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

Only you (or an authorized agent) may make a verifiable consumer request for your personal information and you (or an authorized agent) may make a verifiable consumer request on behalf of your minor child.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

Additionally we may deny your request to know for a number of different reasons, including for the reasons identified above in the “Information we will not disclose or What is personal information” section and in the CCPA.

The Process We Use to Verify Your “Right to Request Deletion” of Personal Information

- If you are our customer and have an account with us, we may verify your identity through our existing authentication practices for your account. If we suspect fraudulent or malicious activity on or from your account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person about whom we have collected the personal information.
- Non-Customer or Non-Account Holders: If you are not a customer or do not hold an account with us, we will verify you as follows:
 - You will need to provide your name, address and contact phone number, which we will process to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that you are the consumer whose personal information is requested to be deleted. If you submit a request on behalf of your minor child, you will also be required to submit affirmation that you are the child’s parent or legal guardian.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud-prevention purposes. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA or other applicable law.

Generally, if we are unable to verify your identity, we will inform you and explain why we were unable to do so.

Our Response to Your “Right to Request Deletion” of Personal Information

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 business days and provide you with additional information about how we will process the request. Upon receiving your confirmation, we will delete your Non-Exempt Personal Information from our records and we will also direct any service providers we work with to also delete your Non-Exempt Personal Information from their records. CCPA defines deletion of your personal information as removal from our records, de-identifying the personal information, or aggregating your personal information. We and our service providers may choose any of these three methods.

Our goal is to respond to your request within 45 calendar days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 calendar days total) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take an additional 45 calendar days to respond.

We will not charge you to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may refuse to act on your request to delete if, for example, it is unfounded or excessive, if we cannot verify your identity or the authority of your agent, or because of a conflict with federal or state law, and if so, we will let you know.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. For example, unless otherwise permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Contacting Us for more Information

If you have any questions regarding our privacy policies, our California Privacy Policy, the ways in which we collect, use, and disclose your personal information, or how to exercise your rights under the CCPA, please do not hesitate to contact us at:

Golden Valley Bank
190 Cohasset Road, Suite 170
Chico, CA 95926

Email: contact@goldenvalley.bank

Phone: 530-894-1000