
Department:	Compliance
Policy For:	California Consumer Privacy Act Policy
Board Approved:	May 22, 2023
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California Consumer Privacy Act (CCPA) Policy

PURPOSE

It is the policy of Summit State Bank (Bank) to comply with the requirements of the California Consumer Privacy Act (CCPA) that became effective January 1, 2020. CCPA gives consumers more control over the personal information that businesses collect about them and the CCPA regulations provide guidance on how to implement the law. CCPA does not apply to personal information collected, processed, sold, shared, or disclosed by financial institutions pursuant to federal law as it pertains to the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (CFIPA) and implementing regulations.

BACKGROUND

The California Consumer Privacy Act (CCPA), enacted in 2018 and effective January 1, 2020, created new consumer rights relating to the access to, deletion of, and sharing of personal information that is collected by businesses. Compliance with CCPA was required by July 1, 2020.

In November of 2020, California voters approved Proposition 24, California Privacy Rights Act (CPRA), which amended the CCPA and added new additional privacy protections that began on January 1, 2023.

DEFINITIONS UNDER CCPA

“**Consumer**” is every individual in California for other than a temporary or transitory purpose, and every individual who is domiciled in California who is outside the State for a temporary or transitory purpose.

“**Personal information**” is any information that “identifies, relates to, describes, is capable

of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” This definition includes not only common identifiers, such as a name, address, and social security number, but other information such as purchasing history or tendencies, biometric information, internet activity, geolocation data, employment information, and education information, among other things. It does not, however, include publicly available information or deidentified or aggregate consumer information.

RESPONSIBILITY

The Bank is responsible for implementing a policy to comply with the California Consumer Privacy Act. The Bank’s CCPA policy must disclose specific business practices, such as a description of a consumer’s rights under CCPA, how they can submit requests for disclosure, deletion, and opting-out of the sale of personal information, and additional information regarding their data collection and sharing practices. All employees of Summit State Bank must comply with the terms of this policy. Periodic training will be implemented, on an as needed basis, for all individuals responsible for handling such consumer requests. This training will make sure that those individuals are informed of the requirements of the Bank’s CCPA policy and how to direct consumers to exercise their rights under the CCPA.

CONSUMER RIGHTS UNDER CCPA

With the passing of the California Consumer Privacy Act rights were given to California consumers. These rights are listed below:

- The right to know what personal information is collected, used, shared, or sold, both as to the categories and specific pieces of personal information.
- The right to delete personal information held by businesses and by extension, a business’s service provider.
- The right to opt-out of sale of personal information. Consumers can direct a business that sells personal information to stop selling that information. Children under the age of 16 must provide opt in consent, with a parent or guardian consenting for children under 13. **SUMMIT STATE BANK DOES NOT SELL PERSONAL INFORMATION.**
- The right to non-discrimination in terms of price or service when a consumer exercises a privacy right under CCPA.

As of January 1, 2023, under CPRA, consumers were provided additional rights to those above, such as:

- The right to correct inaccurate personal information.
- The right to limit the use and disclosure of sensitive personal information collected.

Furthermore, if you are a California consumer, as defined by CCPA, you have the right to request, twice in a 12-month period, the personal information we have collected, used and disclosed about you during the past 12 months.

SUBMIT A REQUEST

The Bank has created three methods for how a consumer may make a request for information. These methods are listed below:

- Call (707) 284-5750
- Email CCPArequests@summitstatebank.com
- Visit any of our locations

BUSINESSES SUBJECT TO CCPA

For-profit Businesses are subject to CCPA if one or more of the following are true:

1. Has gross annual revenues in excess of \$25 million.
2. Buys, receives, or sells the personal information of 100,000 or more consumers, households, or devices.
3. Derives 50 percent or more of annual revenues from selling consumers' personal information.

REQUIREMENTS FOR BUSINESS COMPLIANCE UNDER CCPA

The CCPA imposes new business obligations/disclosures to comply. These obligations/disclosures are listed below:

- Businesses must disclose financial incentives, if applicable, offered in exchange for the retention or sale of a consumer's personal information and explain how they calculate the value of the personal information. Businesses must also explain how the incentive is permitted under the CCPA.
- Businesses must inform consumers, at or before the point of data collection, of the categories of personal information it collects and the purposes for which it will be used.
- Businesses must verify the identity of consumers who make requests to know and to delete, even if the consumer maintains a password-protected account with the business.
- Businesses must create procedures on how to respond to requests from consumers and must provide at least two methods for consumers to submit a request to know, delete, and/or opt-out.
 - For requests to opt-out, businesses must provide a "**Do Not Sell My Personal Information**" link on their website and/or mobile app(s). However, as stated above, Summit State Bank does not sell personal information therefore such request will be acknowledged, but no action will be taken by the Bank.
- Businesses must respond to requests from consumers to know, delete, and/or opt-out within specific timeframes, typically 45 days. (Businesses can take an additional 45

days to respond to a verified request if the business notifies the consumer within the initial 45-day period and provides reasons for the delay.)

- Businesses must maintain records of requests and how they responded for 24 months in order to demonstrate their compliance with CCPA requirements. The Compliance Team has created a log that will be updated when such requests are made.