

FACTS

WHAT DOES *Savings Bank* OF MENDOCINO COUNTY DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security Number and Account Balances
- Transaction History and Payment History
- Checking Account Information
- Wire Transfer Instructions

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons *Savings Bank* OF MENDOCINO COUNTY chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Savings Bank share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes- to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes- information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes- information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

Who we are

Who is providing this notice?

Savings Bank OF MENDOCINO COUNTY

What we do

How does *Savings Bank* protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does *Savings Bank* collect my personal information?

We collect your personal information, for example, when you

- Open an account or deposit money
- Pay your bills or apply for a loan
- Make deposits or withdrawals from your account

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes-information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Savings Bank* OF MENDOCINO COUNTY has no affiliates.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Savings Bank* OF MENDOCINO COUNTY does not share with nonaffiliates so they can market to you.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Savings Bank* OF MENDOCINO COUNTY does not jointly market.

Questions?

Call 707-462-6613 or 1-866-774-8220 or go to www.savingsbank.com

OUR CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY

This policy was last updated on April 25, 2023

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

A consumer, who is a California resident, has the right to request that we disclose what personal information we collect, use, and disclose.

We do not use or disclose Sensitive Personal Information for any purpose other than a Permissible Use.

If you wish to submit a verifiable consumer request for personal information we collect, use, or disclose you may:

Call us at 1-866-774-8220

Access our *Contact Us* form online at <https://www.savingsbank.com/contact.php>

Log into your Online Banking account and click on Contact us then click Send a Secure Message.

Come into one of our banking centers and ask one of our associates for a CCPA Request Form.

We reserve the right to verify the legitimacy of all requests, using specific information you can provide that matches our records.

Below is a list of categories of personal information (PI) we have collected about consumers in the preceding 12 months:

Collection of Personal Information (PI)

Categories of Personal Information We Collect
<ul style="list-style-type: none">• Identifiers including but not limited to: name, social security number, driver's license number, passport number, governmental identification card, or other similar identifiers• Information that identifies, relates to, describes, or is capable of being associated with you, including but not limited to signature, address, telephone number, employment history, education, financial information, medical information, or health insurance information• Characteristics of protected classifications under California or federal law• Information the identifies racial or ethnic origin• Commercial information, including records of personal property, products or services purchased, obtained or considered• Biometric information• Internet or other electronic network activity information such as browsing history, search history, and information regarding your interaction with an internet web site, application, or advertisement• Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account• Geolocation data• Professional or employment-related information• Education information• Inferences drawn from any of the information above to create a profile of preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

Categories of Sources from Which We Collect the Personal Information

Employees/Job Applicants:

- Job application
- Information you input to our Human Resource Information System
- Information you provided on your job application or in interviews, employment reference checks, employment background checks, credit report
- Employee Self Identification Form
- Fingerprints
- Interaction with our applicant tracking web page
- A timeclock application you installed on your personal device

Others:

- Information you provided to us when applying for or opening a deposit account or loan, or any related services
- Information you provided to us to perform a transaction on behalf of yourself or someone else
- Information received from credit reporting agencies
- Information received from third-party identity verification services
- Internet search engines, including social media
- Public records and governmental agencies
- Social media comments or complaints related to us
- Interaction with our Online Banking web page
- Geographic location of internet activity

Our Business or Commercial Purpose for Collecting Personal Information

Employees/Applicants:

- To screen, interview, hire job applicants.
- To compensate, insure, administer benefits, administer employment related actions, communicate, and manage
- To provide employment verifications
- To submit for background checks
- To detect and prevent cybersecurity threats
- To allow you to clock in and out of work on your personal device

Others:

- To approve or decline loan or deposit account applications.
- To service products and services you have with us.
- To conduct institutional risk analysis and mitigation.
- To comply with federal consumer and employee protection laws
- To identify customer service and regulatory complaints, to manage reputational risk
- For fraud detection and prevention

Categories of Third Parties with Whom We Disclose Personal Information
<p>Employees/Applicants:</p> <ul style="list-style-type: none"> • Payroll vendor • Insurance carriers • Third parties who conduct background checks • Third parties who request employment verification • Governmental entities
<p>Others:</p> <ul style="list-style-type: none"> • Vendors who provide services related to maintaining your account, including transaction services and online access. • Vendors who provide fraud detection and mitigation services • Vendors who provide merchant services for your business • Vendors who provide loan-related services • Consultants and auditors for institutional risk analysis and mitigation • Governmental entities • Credit reporting agencies • Third parties who submit legal orders • Our regulators

Disclosure or Sale of Personal Information

We have not sold or shared any personal information about consumers in the preceding 12 months for a business or commercial purpose.

We have disclosed personal information about consumers to third parties for a business or commercial purpose in the preceding 12 months:

Identifiers including but not limited to name, social security number, driver’s license number, or other similar identifiers

Financial account, debit card, or credit card number

Information that identifies, relates to, describes, or is capable of being associated with you, including but not limited to signature, address, telephone number, employment history, education, financial information, medical information, or health insurance information

Characteristics of protected classifications under California or federal law such as racial or ethnic origins

Commercial information, including records of personal property, products or services purchased, obtained or considered

Internet or other electronic network activity information such as browsing history, search history, and information regarding your interaction with an internet web site, application, or advertisement

Professional or employment-related information

Education information

We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

Right to Request Deletion or Correction of Personal Information

You have the right to request the deletion or correction of any personal information about you which we have collected.

If you wish to submit a request to delete or correct the personal information we collected or maintain about you, you may:

Call us at 1-866-774-8220

Access our *Contact Us* form online at <https://www.savingsbank.com/contact.php>

Log into your Online Banking account and click on Contact us then click Send a Secure Message.

Come into one of our banking centers and ask one of our associates for a CCPA Request Form.

In order to identify you we will ask for specific information that matches our records.

Right to Opt-Out of the Sale of Personal Information

We do not sell the personal information of consumers to third parties.

Right to Non-Discrimination for the Exercise of Your Privacy Rights

You have a right not to receive discriminatory treatment by us for the exercise of any of your privacy rights conferred by the California Consumer Privacy Act (California Civil Code § 1798.100 *et seq.*)

Authorized Agent

You may designate an authorized agent to make a request under the CCPA on your behalf via the same methods described for submitting a request on your own behalf. We will require you to provide the authorized agent written permission to submit such a request on your behalf. We retain the right to verify the legitimacy of that designation, and to identify both you and the agent. We will identify you with information you have previously provided to us and with information about your account(s) or transactions. If we are unable to identify both you and the agent, we may deny the request.

Contact for More Information

Call us at 1-866-774-8220

Access our *Contact Us* form online at <https://www.savingsbank.com/contact.php>

Log into your Online Banking account and click on Contact us then click Send a Secure Message.

Come into one of our banking centers and ask one of our associates for information.

Mobile Banking Application Privacy Policy

This policy was last updated on July 31, 2023

General

We want you to understand the types of information we access, collect, use, store, and transfer (“Process”) through our mobile banking application (our “App”), including when you are using the App as well as when the App is running in the background. Be assured the App Processes your information only for the following limited purposes:

- to provide you with digital banking and related services (“Services”);
- to maintain & improve our Services;
- to ensure our Services are working as intended, such as tracking outages or troubleshooting issues that you report to us;
- to develop new Services and features;
- to provide you with personalized Services and content;
- to measure the performance of our App and Services;
- to communicate with you;
- to protect our Institution and customers from fraud, abuse, security risks, and technical issues; and
- any other specific purposes referenced or described in this Mobile Banking Application Privacy Policy (“Policy”).

We will always ask for your consent before using your information for a purpose that isn’t covered in this Policy.

Information you enter or provide to us

When you register, access, and use the App, you provide us with personal and sensitive information that includes your name, password, government identifiers like your social security number (SSN) or drivers’ license number, phone number, email address, physical or mailing address, financial information, payment information, payment card information, and credit information.

Other information we collect as you use our App

The information we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your other apps, browsers, and devices with our digital banking services.

Additionally, and as described in more detail below, your device may periodically contact our backend digital banking systems to provide information about your device and connection to the

digital banking services. This information may include things like your device type and carrier name, crash reports, which apps you have installed, and, depending on your device settings, other information about how you are using your mobile device.

Your activity

We collect information about your activity in connection with our App, in order to better understand:

- your interactions and behavior associated with App content and features;
- the ways in which you are moving through and navigating the App;
- the Services and features that are most valuable to you;
- areas or stages of the App where you may disengage or get stuck; and
- your typical patterns of behavior in connection with the App.

The activity information we collect may include:

- logs, tags, reporting, and other analytics reflecting your specific use of screens, workflows, buttons, and features;
- logs, tags, reporting, and other analytics reflecting your navigation through, engagement with, and disengagement with the App;
- haptic information related to your use of your device (e.g. swipes, taps);
- your financial, payment, and transaction activity and history (including purchase history); and
- your navigation to or activity on third-party sites and apps linked to our App.

This information enables us to improve, modify, or expand the services, features, and experience delivered through the App as well as to support in-App messaging, deliver user guides and polls, and optimize performance of the App. Additionally, and in particular, this information also enables us to detect and flag suspicious or potentially fraudulent activity.

Your device and other apps

We access and collect information related to your device and other Apps along with associated data. This information may be collected both while you use the App and while the App is running in the background or is otherwise not in use.

Information we process concerning your device and other Apps includes:

- your device type;
- your device ID;

- other available device identifiers;
- your device operating system;
- network and IP address information;
- your cellular data carrier; and
- device and app diagnostic information.

Additionally, if our App needs to access protected features of your device, then you will have an opportunity to provide consent. In the event that you decline to provide express consent, then the App will not be permitted to access data gated by your device's permissions model. Without your express consent, the App will not allow use of the protected feature or related data.

If and when our App accesses your:

- phone or contact book data;
- camera or photos;
- device location; or
- other background restricted permissions,

then all related data is treated as personal or sensitive data subject to this Policy.

Restricted permissions accessed by our App include:

- Use of Fingerprint
 - We collect information about your biometric identifiers when you use our App, which enables us to streamline your authentication and login experience and access our Services with less friction.
- Precise or Fine Location
 - We collect information about your location when you use our App, which helps us offer features like search results for branch and ATM locations, credit card controls, and messages based on your general location.
- Read or access Contacts, Contacts List, or phone log
 - We may collect information about your contacts when you use our App, which enables us to facilitate requested P2P and other payment transactions.
- Access Camera or Pictures/Photos
 - We collect information from your device's camera and photos when you use our App, which enables use of mobile check deposit and other image scanning or capturing features of the App.

Sharing your information

Our App will only share information with third parties with your consent, for the purpose of providing you with Services, or for the other ancillary purposes described in this Policy.

Our App Processes your financial or payment information or government identification numbers and will never publicly disclose any personal and sensitive user data related to financial or payment activities or any government identification numbers.

Our App may Process non-public phonebook or contact information, and we do not allow unauthorized publishing or disclosure of your or others' non-public contacts.

Our app includes third-party code and SDKs that may collect personal and sensitive user data solely for the purposes described in this Policy. All third-party providers of code and SDKs will Process your data in accordance with this Policy and all applicable law and standards.

Neither we nor our third-party providers will ever sell your personal and sensitive data Processed by the App.

The App may also transfer data as necessary for legal reasons including compliance with a valid governmental request, applicable law, or as part of a merger or acquisition with legally adequate notice to users.

The App handles all personal and sensitive user data securely, including transmitting it using modern cryptography.