



## California Consumer Privacy Act Notice

This California Consumer Privacy Act Notice (“Notice”) is provided by *BankFinancial, NA* and its Affiliates (*BankFinancial*).

<b>WHY?</b>	<p>Under the California Consumer Privacy Act (“CCPA”), California residents (“Consumers”) have been granted certain rights regarding their personal information. This Notice explains how we collect, use, share and disclose personal information about California residents. This Notice also explains how California residents can exercise their rights under the CCPA to request that we:</p> <ol style="list-style-type: none"> <li>1. Provide certain personal information that we have collected about them during the past 12 months, along with related information described below, or</li> <li>2. Delete certain personal information, to the extent possible.</li> </ol>
<b>WHO?</b>	<p>The CCPA only applies to information about California residents (“Consumers”). A “consumer” under the CCPA is a natural person who is a California resident.</p>
<b>WHAT?</b>	<p>Under the CCPA, “personal information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with a California resident or household. This information is referred to in this Notice as “Personal Data.”</p>

### Categories of Personal Data that We Collect and Disclose

*BankFinancial, NA* and its Affiliates, including, Financial Assurance Services, Inc., *BankFinancial* Asset Recovery Corporation and *BankFinancial* Corporation (collectively *BankFinancial* or the “Bank”) collects and discloses Personal Data in a variety of contexts, including to provide financial products and services, make credit decisions, prevent fraud, service accounts, sell products and services to customers and third parties, perform marketing, comply with legal and regulatory obligations, improve the quality of our services, to secure our assets and those of our customers.

The Personal Data that we collect, use, share or disclose about a specific California resident will depend on, for example, our relationship or interaction with that individual.

During the past 12 months, we have collected the following categories of Personal Data:

1. Personal unique identifiers, such as full name, date of birth and federal or state issued identification numbers including Social Security number, driver’s license number, passport number, and/or other Government identification number
2. Personal information, including contact details such as telephone number, address, email and 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
3. Characteristics of protected classes or groups under state or federal law, such as sex, age or military or veteran status
4. Purchase information, such as products and services obtained and transaction histories
5. Internet or online information such as browsing history, and information regarding interaction with our websites, applications, or advertisements
6. Geolocation data to identify an electronic device’s physical location
7. Audio, electronic, and video recordings
8. Professional or employment-related information
9. Education information; and
10. Inferences based on information about an individual to create a summary about, for example, an individual’s preferences and characteristics

During the past 12 months, we have also disclosed and shared the categories of Personal Data listed above for our business purposes. We have not, however, sold Personal Data that is subject to the CCPA’s sale limitations. The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration.

### Why We Collect Personal Data and How We Use It

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

Purposes for Collection and Use	Examples
For identification and account verification	<ul style="list-style-type: none"><li>Collect identifying information at the account opening process to verify your identity, and use it to make credit decisions, prevent fraud, service accounts and comply with legal and regulatory obligation</li></ul>
Provide and manage products and services	<ul style="list-style-type: none"><li>Establish and process transactions for our products and services including checking accounts, credit cards, loans, investment accounts, as well as additional products for businesses such as commercial financing and payment services</li><li>Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications</li></ul>
Support our everyday operations, including to meet risk, legal, and compliance requirements	<ul style="list-style-type: none"><li>Perform accounting, monitoring, and reporting</li><li>Enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence</li><li>Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims</li><li>Enable the use of service providers for business purposes</li><li>Comply with policies, procedures, and contractual obligations</li></ul>
Manage, improve, and develop our business	<ul style="list-style-type: none"><li>Market, personalize, develop, as well as improve our products and services</li><li>Conduct research and analysis, including new product and services development</li><li>Support customer relationship management</li><li>Evaluate and engage in mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets</li></ul>

### Sources of Personal Data

The sources from which we collect Personal Data 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 Data in different contexts.

- From California residents directly, other individuals acting on their behalf, through in-person (e.g., paper application), audible (e.g., phone), or electronic (e.g., website) sources.
- Public records or widely available sources, including credit bureaus and information that available by federal, state, or local government agencies and departments.
- Vendors and service providers: companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing.
- Outside companies or organizations from whom we collect personal data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development.
- Employees and customer referrals.

## Categories of Third Parties with Whom We Share Personal Data

We may also disclose your information to a third party as part of providing products and services, completing transactions, supporting our everyday operations, product development, business management, enforce our agreements and policies, protect the security or integrity of the Bank, its services and assets, protect customers, or with your prior consent, to any other third party. Below are examples of the categories of third parties with whom we share Personal Data in different contexts.

- Companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.
- Companies or individuals that represent California residents such as an accountant, financial advisor, or holding power of attorney.
- Government agencies including to support regulatory and legal requirements.
- Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties.

## Requests Under the CCPA

Currently, **BankFinancial** does not sell personal information. If in the future, it decides to change this policy, the Bank will provide notice and opportunity to opt-out.

A California Resident has the right to request the following:

1. Access Request: Disclose to you the following information covering the 12-month period prior to your request:
  - a. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
  - b. The business or commercial purpose for collecting Personal Data about you;
  - c. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
  - d. The specific pieces of Personal Data we collected about you; and
2. Deletion Request: Delete Personal Data we collected from you, to the extent possible.

**BankFinancial** reserves the right to process a maximum of (2) requests to the same consumer within a 12-month period. If you are a California resident, a business may not discriminate against you for exercising your rights under the CCPA.

## Responding to Requests

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we collect, use, and disclose. When these laws apply, Personal Data may be exempt from, or outside the scope of, Access Requests and Deletion Requests. As a result, in some instances, we may decline all or part of an Access Request or Deletion Request related to this Personal Data. This means that we may not provide some or all this Personal Data when you make an Access Request. Also, we may not delete some or all this Personal Data when you make a Deletion Request.

For example, the Bank may retain personal information in order to:

- A. Complete transaction or services for which the information was collected or provide a service requested by the consumer;
- B. Detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity and prosecute those responsible for such activity;
- C. Debug or identify errors;
- D. Comply with certain sections of the California Electronic Communications Privacy Act;
- E. Engage in certain types of research where the consumer has provided informed consent;
- F. Enable solely internal uses reasonably aligned with consumer expectations;
- G. Comply with a legal obligation; or
- H. Otherwise use it internally in a lawful manner that is compatible with the context in which the consumer provided the information.
- I. Provide a product or service to another business, or while receiving a product or service from another business.

The types of Personal Data described above are examples. We have not listed all types of Personal Data that may not be included when we respond to or process Access Requests or Deletion Requests.

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

**How to Make Requests**

If you are a California resident, and 18 years or older, you can make an Access Request or a Deletion Request by:

1. Contacting us at 1-800-894-6900; or
2. Submitting your request to [#CustomerService@BankFinancial.com](mailto:#CustomerService@BankFinancial.com)

**Changes to this Notice**

We may change or update this Notice periodically. When we do, we will post the revised Notice on our websites and indicate when the Notice was “Last Updated.”

**Other Important Information**

None