



## California Consumer Privacy Act Notice

Last Updated: July 1, 2025

If you are a California resident, you may have certain rights under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (collectively, “CCPA”) regarding your personal information. Esquire Bank, NA (“Esquire”, “we”, “us” or “our”) are committed to providing consumers their rights under the CCPA and to protecting the privacy and security of our customers and employees. This notice supplements the information contained in our privacy notice and explains the rights of California residents regarding the collection, use, sale, and sharing of their personal information under the CCPA.

Under the CCPA, personal information is information that identifies, relates to, or could reasonably be linked directly or indirectly with a California resident.

The specific personal information that we collect, use, and disclose covered by the CCPA will vary based on your relationship or interaction with us. The CCPA does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”), which is governed by Esquire’s privacy notice, located on our website.

This notice provides information about our practices regarding the collection, use, disclosure, sharing, sale, and retention of personal information and applies solely to California residents. Under the CCPA, the terms “share” and “sale” refer to providing information to a third party for the purposes of advertising and targeted marketing. We do not share or sell information as contemplated by the CCPA. We do disclose information to third parties that we contract with to be able to provide financial services. These third parties may only use information provided for the purposes disclosed in this notice.

### Categories of Personal Information We Collect

We collect personal information to provide financial products and services, and for employment and human resource purposes. The personal information that we collect will depend on our relationship with you. In the preceding 12 months, we have collected the following categories of personal information.

Personal identifiers, such as name, social security/individual tax identification number, driver’s license or other identification documents number.

Personal information, such as telephone numbers, addresses, email addresses, financial information.

Characteristics of protected classes under federal law, such as age, ethnicity or national origin, race, marital status, gender, veteran or military status, nationality, citizenship, religion, disability.

Commercial information, such as records of personal property, debts, assets, credit history, credit score, account information from other financial institutions, account and loan numbers, balances, transaction histories.

Internet or similar network or device information, such as device identifier, IP address, user identification (User ID), browsing and search history, information in cookies, mobile device information.

Geolocation data, such as information used to identify your device’s location.

Employment information, such as work history, salary, years on the job, or current and prior employer.

Education information, such as details about education, school, or degrees earned.

Sensitive personal information referenced above includes social security/tax identification number, driver's license or other identification documents number, user ID, financial account, debit card or credit card number, credentials to access the account, and racial or ethnic information when required to be collected by law.

## **Sources of Personal Information**

We obtain the personal information referenced above from sources which depend on our relationship with you. The information below lists the categories of sources from which we collect personal information.

- Directly from our clients or their agents.
- Public records.
- Service providers or other third parties that interact with us in connection with the services that we provide.
- Our website or online banking applications.

## **Reasons for Collection and Use of Personal Information**

We collect and use personal information about consumers for the following business purposes.

To manage products and services, such as

- Supporting the management and maintenance of products and services that we offer, which includes but is not limited to processing transactions, providing statements and account information, and accessing online or mobile banking.
- Responding to court orders and legal investigations and reporting to credit bureaus.

For human resource management, such as

- Identifying and processing employment applicants, including conducting background checks, and verifying qualifications for employment.
- Administering employee services, including pay/compensation.
- Providing benefits to employees and dependents, including healthcare and retirement plans.
- Managing the health and safety of our employees.

To comply with laws and regulations, such as

- Applicable banking, lending, and employment laws, including the Bank Secrecy Act and the Bank Protection Act.
- For us to evaluate our compliance with employment and fair lending laws and regulations.

To provide security, such as

- Using of security cameras to protect you and our employees when on our premises.
- Protecting client accounts if accessed by a new device and by a device in a new area.

For marketing, such as

- Communicating with consumers regarding products and services offered by us, when in compliance with federal and state laws and regulations.

## **How We Share Personal Information**

We may disclose personal information about consumers to third parties and service providers for business purposes. When we disclose personal information for a business purpose we enter a contract that describes the purpose and requires the recipient to keep the information confidential and not use it for any other purpose. We do not collect personal information for the purpose of inferring characteristics about you.

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose.

### Personal identifiers

- For daily operations, including to maintain or service accounts, process payments and transactions, verify customer information, and maintain websites and technology infrastructure.
- To conduct activities for human resources related to potential, existing, and former employees.
- To protect consumer accounts and personal information, such as account monitoring services for fraud.
- To comply with laws and regulations.
- To comply with legal and regulatory requirements or provide professional services to us, including auditors, accountants, and legal services.

### Personal information

- For daily operations, including to maintain or service accounts, process payments and transactions, verify customer information, and maintain websites and technology infrastructure.
- To conduct activities for human resources related to potential, existing, and former employees.
- To comply with laws and regulations.
- To comply with legal and regulatory requirements or provide professional services to us, including auditors, accountants, and legal services.

### Characteristics of protected classes

- For daily operations, including to maintain or service accounts, process payments and transactions, verify customer information, and maintain websites and technology infrastructure.
- To conduct activities for human resources related to potential, existing, and former employees.
- To protect consumer accounts and personal information, such as account monitoring services for fraud.
- To comply with laws and regulations.
- To comply with legal and regulatory requirements or provide professional services to us, including auditors, accountants, and legal services.

### Commercial information

- For daily operations, including to maintain or service accounts, process payments and transactions, verify customer information, and maintain websites and technology infrastructure.

- To protect consumer accounts and personal information, such as account monitoring services for fraud.
- To comply with laws and regulations.
- To comply with legal and regulatory requirements or provide professional services to us, including auditors, accountants, and legal services.

#### Internet or other electronic network activity information

- To protect consumer accounts and personal information, such as account monitoring sign-in activity.

#### Geolocation data

- To protect consumer accounts and personal information, such as account monitoring sign-in activity.

#### Employment information

- To conduct activities for human resources related to potential, existing, and former employees.
- To comply with laws and regulations.
- To comply with legal and regulatory requirements or provide professional services to us, including auditors, accountants, and legal services.

#### Education information

- To conduct activities for human resources related to potential, existing, and former employees.
- To comply with laws and regulations.
- To comply with legal and regulatory requirements or provide professional services to us, including auditors, accountants, and legal services.

### **Share or Sale of Personal Information**

- Esquire Bank does not share or sell the personal information of consumers to third parties as contemplated by the CCPA, including personal information of minors under 16 years of age.

### **Retention of Personal Information**

- Personal information is retained as required by regulations and laws. Esquire Bank will retain this information as long as is necessary to provide the financial products and services we offer or that are requested by the consumer, or as long as required for employment purposes. All data retained by us is provided with equal protection. It is not used other than how it is described in this policy.

### **Your Rights**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section explains those rights and how to exercise them.

- The right to request, free of charge, the following information covering the 12 months preceding the request:
  - The categories of personal information we collected about you.
  - The categories of sources from which the personal information was collected.
  - The purpose for collecting personal information.

- The categories of third parties to whom we disclosed personal information.
- The personal information that was disclosed and the purpose for disclosing the personal information.
- The specific pieces of personal and sensitive information we collected about you.
- The right to correct inaccurate information
- The right to delete personal information, subject to certain exceptions.
- The right to request correction of inaccurate personal information about you.
- The right to non-discrimination in terms of price or service when you exercise a privacy right under CCPA.

Under the CCPA, you have the right to opt-out of the sharing or sale of personal information. However, since we do not share or sell information, we do not provide you an opt-out.

## Making a Request

If you wish to submit a verifiable request to exercise your rights under the CCPA, you may select from one of these options:

- Contact us at: **800-996-0213**
- Email us at: **marketingops@esqbank.com**
- Visit a branch

When you request information, we will verify your identity using standard verification methods, utilizing information that we already have about you. This may include personal identifying information about yourself or your accounts with us.

In order to verify your identity, we will review your government issued photo identification, account numbers, card numbers, or other personal identifying information.

Your authorized agent may also make a request on your behalf. When submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

The requests will be responded to after verification of the requestor's identity and evaluation of the request. We are not obligated to respond to a verifiable request if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf. Personal information that is protected by other federal privacy laws, such as the Gramm-Leach-Bliley Act, Fair Credit Reporting Act, or the Health Insurance Portability and Accountability, is exempt from CCPA requests. We may deny requests related to personal information that is exempt from CCPA requests. Additionally, we may not delete such exempted personal information when requested. As a financial institution, we are required to maintain personal information to comply with federal and state laws, as well as legal obligations. Although we may not be able to delete information, we will never use personal information in a manner other than you would expect.

Please note that you may only make a CCPA verifiable request twice within a 12-month period.

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this notice, we will post the updated notice on our website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.