

Royal Business Bank Applicant and Employee Privacy Policy

Consumer Notice at Collection

Royal Business Bank has implemented and published on its website various Privacy Policies & Notices, including notices under the California Consumer Privacy Act of 2018 (CCPA), as amended and expanded by the California Privacy Rights Act of 2020 (CPRA). An employee with questions regarding the Bank's privacy policies (including a Notice at Collection required by the CCPA/CPRA) may consult the Privacy Policies & Notices section of the Bank's website, which is located here: [Privacy Policies & Notices | Royal Business Bank \(royalbusinessbankusa.com\)](https://royalbusinessbankusa.com/privacy-policies-notices).

The policy below provides additional information to the Bank's employees concerning their privacy rights and is intended to supplement the Privacy Policies & Notices published to all consumers (including applicants and employees) at the location noted above.

This policy applies only to California residents.

Description of Consumer Rights

1. Your Rights. You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended and expanded by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

(a) Disclosure of Personal Information We Collect About You. You have the right to know:

- The categories of personal information we have collected about you, including sensitive personal information;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting, selling, or sharing personal information;
- The categories of third parties with whom we share personal information, if any; and
- The specific pieces of personal information we have collected about you.

Please note that we are not required to:

- Retain any personal information about you if, in the ordinary course of business, that information about you is not retained;
- Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
- Provide the personal information to you more than twice in a 12-month period.

(b) Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose. In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:

- The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; and

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- The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose.
- (c) **Right to Opt-Out of the Sale or Sharing of Personal Information.** You have the right to opt-out of the sale or sharing of your personal information.
- (d) **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to opt-out of the use and disclosure of your sensitive personal information for anything other than supplying requested goods or services.
- (e) **Right to Deletion.** Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:
- Delete your personal information from our records;
 - Direct any service providers to delete your personal information from their records; and
 - Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

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- (f) **Right to Correction.** You have the right to request correction of inaccurate personal information maintained by us about you. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.
- (g) **Protection Against Discrimination.** You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA and CPRA. This means we cannot, among other things:
- Deny goods or services to you;
 - Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
 - Provide a different level or quality of goods or services to you; or
 - Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to us by your personal information.

How to Exercise Rights under Privacy Policy

1. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Complete a California Consumer Privacy Rights Act Request Form, which may be obtained from the RBB Human Resources Department and email the signed form to Human Resources.
- Email HR with any questions or to return the Form at hr@rbbusa.com.
- You may also follow the process set forth in the California Privacy Rights Act Notice policy and complete the on-line form called “Do Not Sell or Share My Personal Information”, both which are available under the Privacy Policies & Notices section of the Bank’s website identified in the first paragraph of this policy.

Please note that you may only make a data access or data portability disclosure request twice within a 12-month period.

2. Verifying Your Identity. If you choose to contact us by email or phone, you will need to provide us with:

- Enough information to identify you (e.g., your full name and address);
- Proof of your identity (e.g., a copy of your driving license or passport); and
- A description of what right you want to exercise and the information to which your request relates.

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We are not obligated to make a data access or data portability disclosure 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.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.