

Online Privacy Statement

First Commercial Bank (USA) understands and respects that your privacy is important to you. The Bank is committed to protecting our clients' information as well as protecting the privacy of our online customers and site visitors. First Commercial Bank (USA) complies with all information security and privacy laws, focusing on financial controls over client information and identity protection.

Collecting Information

Our Online Privacy Statement describes how we may collect, use and share information you provide when you visit our website, receive our emails or interact with our third-party websites

When you visit our site or use our Online Banking service, we gather non-personal information such as the type of internet browser you are using, the operating system of your device, your IP address, and other information collected through cookies.

We may also gather personal information that you provide to us such as your name, address, email, Social Security or tax identification number, birth date and mother's maiden name. Collecting this personal information enables us to offer you online services to assist with your financial needs such as when you are enrolling in Online Banking. Your information may also be shared with third parties such as a bill payment services provider in order to provide such service to you. The personal information you provide online is held by the Bank and is used in processing your application for a new product or service. You can access and/or change information in connection with your account or application by contacting your branch of account.

FCB uses the information we collect about and from you to manage our business such as recognizing when you return to our site and respond to your requests. We may also use personal information we have about you such as your email or postal address to deliver notices and other important information to you.

Cookies

You have the ability to control how your non-personal information is collected and used online. Cookies are commonly used on websites and do not harm your system. A cookie is a small data file that can be placed on your hard drive when you visit certain websites and collect, store, and sometimes track information. Your internet browser may have settings and preferences which allow you to block the use of cookies from being placed on your computer. Refer to your browser

settings details. FCB's website does not place cookies and other browser related objects on your computer.

Email

When you provide your email address to First Commercial Bank (USA), we may use it to send you general notices or important news about your account(s), respond to your request, request your feedback or opinions, or provide other information that might be of interest to you.

Please do not include personal account information (i.e. account number(s), social security numbers, etc.) or other **confidential** information in your email message. In addition, email messages will not serve as a sufficient method for any requirement imposed on you to provide written notice, nor may email messages be used to place a stop payment on a check, cancel a bill payment, request account transfers, or report lost or stolen PINs and/or cards.

California Do Not Track Disclosure

There are no current standards for how "Do Not Track" consumer browser settings should work on commercial websites. Therefore, we do not respond to or take any action with respect to the "do not track" configuration set on your browser.

Updates to this Privacy Statement

From time to time, we may change this Online Privacy Statement. As shown below, the effective date of this statement shows the last time it was revised or materially changed. Checking the effective date allows you to determine whether there have been any changes since the last time you reviewed the statement. Your use of the web site following any changes to this statement means that you accept the revised statement.

Effective Date: October 15, 2015

Protecting Children's Privacy Online

This web site is not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide personal information through this site. First Commercial Bank (USA) does not knowingly collect information from children under 13 without parental consent. For more information about the Children's Online Privacy Protection Act (COPPA), you should visit the Federal Trade Commission Website.

California Consumer Privacy Act Disclosure

This disclosure provides an explanation of your rights under the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides the following rights to applicable consumers: (1) Know what personal information is being collected about them; (2) Access personal information that has been collected about them; (3) Request the deletion of their personal information, subject to certain restrictions; (4) Prevent the sharing or sale of their personal information to third parties; (5) Sue or join class-action suits against erring businesses; and, (6) Receive equal service and price even if they exercise privacy rights. Contact your local branch if you are uncertain regarding the applicability of the CCPA.

RIGHT TO ACCESS

First Commercial Bank (USA) (the “Bank”) may from time to time, and with your permission or at your request, collect and maintain information about you related to” (1) current and historical residential history; (2) current and historical employment history; (3) current and historical financial position, including but not limited to assets, liabilities and net worth; (4) current and historical credit history; (5) current and historical transaction history, including but not limited to application information, transaction details, analyses of transaction details, evaluations of requests for products and services, and documentation related to transactions, and documentation regarding disposition of requests for products and services; (6) personal and professional references; and, (7) other related information deemed necessary to maintain account relationship and comply with applicable laws, rules and regulations. The Bank collects and maintains your information for the purpose of evaluating your requests for products and services, to properly maintain your accounts with the Bank and to comply with applicable laws, rules and regulations.

If you are subject to the CCPA you have the right to request the categories and specific pieces of personal information that the Bank has collected. To obtain the information you must submit a “Verifiable Consumer Request.” A Verifiable Consumer Request is a request that is made by you on your behalf, by you on behalf of your minor child, or by a natural person or a person registered with the California Secretary of State, authorized by you to act on your behalf. The Bank shall respond to your request within 45 days of receiving your Verifiable Consumer Request” unless the Bank chooses to extend the timeframe to 90 days. The Bank must notify you within the initial 45 day period if it chooses to extend the period to 90 days. You are permitted two requests in a 12-month period. The information provided will cover the 12-month period immediately preceding the request.

RIGHT TO DELETE

If you are subject to the CCPA you have the right to request that the Bank delete any personal information about you which the Bank has collected. You must submit a Verifiable Consumer Request to request deletion of your personal information. Under certain circumstances the Bank is not required to comply with your request to delete personal information. Upon receipt of a Verifiable Consumer Request the Bank will inform you whether your request is subject to the CCPA exceptions and as such, whether the Bank will be unable to delete your personal information.

RIGHT TO KNOW

If you are subject to the CCPA you have the right to request that the Bank disclose to you upon receipt of a Verifiable Consumer Request, the following information: (1) categories of personal information collected about you; (2) categories of sources from which the personal information is collected; (3) business or commercial purpose for collecting your personal information; (4) categories of third parties with whom the Bank shares personal information; and, (5) the specific pieces of personal information the Bank has collected about you.

You may submit a Verifiable Consumer Request via regular mail to: First Commercial Bank (USA), Operations Department, 200 East Main Street, Alhambra, CA 91801. You may also submit your Verifiable Consumer Request via e-mail to Operations@bankfcb.com. The Bank shall respond to your request within 45 days of receiving your Verifiable Consumer Request unless the Bank chooses to extend the timeframe to 90 days. The Bank must notify you within the initial 45 day period if it chooses to extend the period to 90 days. You are permitted two requests in a 12-month period. The information provided will cover the 12-month period immediately preceding the request.

RIGHT TO OPT OUT

The Bank does not sell customer information. As such, the Bank need not provide a right to opt out.

RIGHT OF EQUAL SERVICE

The Bank may not discriminate against you because you exercised any of your rights under the CCPA.

QUESTIONS

If you have any questions regarding this disclosure you may contact your branch of account. For contact information please visit our website at www.bankfcb.com.