

California Consumer Privacy Act Policy

Last Updated: March 16, 2021

Introduction

Your privacy is important to us. This California Consumer Privacy Act Policy explains how Luther Burbank Savings collects, uses, and discloses Personal Information relating to **California residents** covered by the California Consumer Privacy Act of 2018 (“CCPA”). This Policy is provided pursuant to the CCPA.

Under the CCPA, ‘Personal Information’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual.

The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”). For example, information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information, please refer to our Privacy Notice.

Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Collection and Disclosure of Personal Information

In the past 12 months, we have collected, and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

- Identifiers, such as name and government-issued identifier (e.g., Social Security number)
- Personal information, as defined in the California safeguards law, such as contact information and financial information
- Characteristics of protected classifications under California or federal law, such as sex and marital status
- Commercial information, such as transaction information and purchase history
- Internet or network activity information, such as browsing history and interactions with our website
- Geolocation data, such as device location and Internet Protocol (IP) location
- Audio, electronic, visual and similar information, such as call and video recordings
- Professional or employment-related information, such as work history and prior employer
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual’s preferences and characteristics

The categories of sources from whom we collected this Personal Information are:

- Directly from you or an authorized agent or family member
- Service Providers and other third parties (e.g., credit bureaus or mortgage brokers)
- Directly and indirectly from activity on our Website, Mobile App, or Social Networks
- Government Agencies and other publically available sources

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To provide you with information, products, loans or services that you request from us, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer identity, processing payments, or providing similar services
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- To maintain, improve, upgrade, or enhance our products and services
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing and collections
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions)

Sharing Personal Information

The categories of third parties to whom we disclosed Personal Information for our business purposes described in this CCPA policy are:

- Vendors and Service Providers who provide services such as website hosting, data analysis, payment and transaction processing, check order fulfillment, customer service, email delivery, auditing, and marketing
- Third Parties who provide services such as online/mobile banking, banking infrastructure, data storage, outside legal counsel, tax advisors, notaries, appraisers, and others supporting the delivery of the bank's products and services to our customers and prospects

Sale of Personal Information

In the past 12 months, Luther Burbank Savings has not "sold" Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this CCPA Policy, "sold" means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Rights under the CCPA

If you are a California resident, you have the right to:

1. Request, twice in a 12 month period at no cost to you, that we disclose to you the personal information we have collected, used and disclosed about you during the past 12 months.
2. Request we delete certain Personal Information we collected from you, subject to certain exemptions; and

3. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by LBS.

How to Exercise Your Rights

To exercise your rights, please submit a request to us by either:

- Completing a form online at:
<https://www.lutherburbanksavings.com/banking-resources/privacy/ccpa/onetrust>
- Calling us at 844-269-1031

Once you have submitted a request, we will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Also, we may ask you to describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Only you or a person that you authorize to act on your behalf, may make a Verifiable Consumer Request, as defined in the CCPA, related to your Personal Information. You may also make a Verifiable Consumer Request on behalf of your minor child.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights. We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

Making a Verifiable Consumer Request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We commit to respond to a Verifiable Consumer Request within 45 days of its receipt. If we require more time (up to a total of 90 days), we will inform you of the reason and extension period in writing.

Authorized Agent

If you are a California resident, you may authorize an agent to make an access or deletion request on your behalf. When a "Request to Know" or a "Request to Delete" is submitted by an authorized agent, Luther Burbank Savings will require the requestor to: (1) provide the authorized agent's written permission to do so; and (2) will require the requestor to verify their own identity directly with Luther Burbank Savings. In the event that Luther Burbank Savings is unable to verify the identity of the requestor or does not receive proof from the authorized agent that the requestor authorized the agent to act on the requestor's behalf, the request will be denied.

Changes to This California Consumer Privacy Act Policy

Luther Burbank Savings may make periodic changes to the Bank's CCPA Policy. When these changes occur, we post the new policy on our website and change the "Last Updated" date. When appropriate, we may notify you through other means.

Contact for More Information

Consumers with questions or concerns about Luther Burbank Savings' California Privacy Policy and practices should call 1-888-578-4495.