

**California Consumer Privacy Act (CCPA) Notice and Policy** April 2022

**Coverage**

This Notice and Policy (“notice”) supplements the information contained in the Broadway Privacy Notice and applies solely to California residents (“consumers” or “you”) as defined in 17014 Title 18 of the California Code of Regulations. Broadway National Bank, all Broadway companies, including Broadway Wealth Solutions, Inc. and Broadway Bancshares, Inc. are collectively referred to as “Broadway” (or as “we”, “us”, or “our”). We have adopted this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

**Your Rights and Choices**

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights.

- You have the right to request that we disclose what personal information we collect, use, disclose and sell.
- You have the right to request the deletion of your personal information that we collect or maintain.
- You have the right to opt-out of the sale of your personal information.
- You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA.

**Sale of Information**

We will not sell and have not sold your personal information to any third party in the preceding twelve months.

**Exercising Disclosure and Deletion Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Upon receipt and confirmation of your verifiable consumer request, we will provide you with the requested information.

You also have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

To exercise the disclosure or deletion rights described above, please submit your request to us by:

- Calling us at (210) 283-6500 or (800) 531-7650
- Visiting a financial center and speaking with a customer service representative

Only you or a person registered with a California Secretary of State that you authorize to act on your behalf may make a request related to your personal information. You may also make a request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. 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.

<b>Categories of Third Parties</b>	We may disclose some, or all, of this information to third parties such as advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, social networks, and consumer data resellers.
<b>Information we collect and disclose</b>	We have collected and disclosed the categories listed below of personal information from consumers within the last twelve (12) months.
<b>Categories</b>	<b>Which include the following:</b>
Identifiers	Name, address, unique personal or online identifier, IP address, email address, account name, Social Security, Driver's License or Passport numbers, or other similar identifiers.
Personal Information	Any information that identifies, relates to, describes, or is capable of being associated with a particular individual such as: name, signature, physical characteristics/description, address, numbers (such as social security, telephone, passport, driver's license, state identification, insurance policy, bank account, credit, or debit card), education, employment, employment history, or any other financial, medical, or health insurance information.
Protected classification characteristics	As defined under California or federal law and including: Age, race, color, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy or childbirth or related medical conditions), veteran or military status.
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Biometric information	Hair color, eye color, fingerprints, height, voice and other biometric data
Internet or similar network activity.	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.
Geolocation data	Physical location or movements.
Sensory data	Audio, electronic visual, or similar information.
Professional or employment-related information	Current or past job history or performance evaluations.
Education information	Student, parent or other family members names or addresses, social security or student number or biometric record, date or place of birth, mother's maiden name or other information that, alone or in combination, is linked or linkable to a specific student that would allow a person to identify the student with reasonable certainty.
Inferences drawn from personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
<b>Purposes of Collection</b>	<p>Information is collected for the following purposes:</p> <ul style="list-style-type: none"> <li>• Auditing related to interactions and transactions such as counting ad impressions.</li> <li>• Detecting or preventing security or fraud related activities and prosecuting those responsible for that activity</li> <li>• Debugging to identify and repair errors that impair existing intended functionality</li> <li>• Performing services including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments and providing financing and other similar transactions.</li> <li>• Undertaking internal research for technological development and demonstration</li> <li>• Undertaking activities to verify or maintain the quality and safety of a service and to improve, upgrade or enhance those services.</li> </ul>