

California Consumer Privacy Act Disclosure and Notice of Collection

Financial institutions collect personal information necessary to offer and provide financial products and services, as well as permitted by federal, state, and local law. Safra National Bank of New York and its affiliates* (SAFRA) collect personal information to use for various business purposes, including but not limited to:

Operational Purposes. This includes offering and providing financial products and services, processing and fulfilling payments and other transactions, and servicing existing or prospective accounts, products, and service offerings.

Security and Fraud Detection. This includes verifying consumer identities; detecting security incidents; protecting against malicious, deceptive, fraudulent, or illegal activity; and supporting prosecution of such activity.

Marketing and Data Analytics. This includes advertising and marketing initiatives and services, data analytics, and quality assurance reviews.

Operation of Our Website. Operating and managing our websites, providing content to you; displaying advertising and other information to you, communicating, and providing additional services to you via our websites. Please see our Privacy Policy (available at https://safra.com/downloads/Privacy_Notice_Safra_Current)

Legal and Regulatory Obligations. This includes collection, disclosure, and storage of data necessary to comply with statutory or regulatory requirements.

Other Notified Purposes. For any other purposes disclosed to you at the time we collected your information pursuant to your consent.

The categories of personal information that SAFRA has collected in the preceding 12 months include

Personal Identifiers. This includes, but is not limited to, personal identifiers such as name, alias, address, social security number, passport number, e-mail address, Internet Protocol address, other online identifiers, and other similar identifiers.

Personal Information Covered Under California's Customer Records Law. This can include data that is also covered under other categories. Personal information in this category can include data from consumer reports, personal financial statements, or any other financial, medical, or health insurance information. Other examples include driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, and debit card number.

Protected Class Characteristics. Includes information about race, color, religion or creed, national origin, sex, age, disability, veteran status, gender, generic information, and citizenship status.

Commercial Information. Includes real or personal property records, products or services purchased, obtained, or considered, and other consuming histories and tendencies.

Sensitive Information. This includes certain government identifiers such as SSN, account login, security code, and

the contents of text messages, mail, and email.

Biometric Information. Biometric data that can be used to establish identity including voice recordings, fingerprints, eye and facial prints.

Internet or Other Electronic Network Activity Information. This includes browsing and search history, and interactions with websites, advertisements, and applications.

Geolocation Data. This can include any information used to identify your physical location (IP location).

Communications, Recordings or Images. Audio, electronic, visual, or similar information.

Professional Employment Information. This includes title, salary, employment files, and references.

Education Information: Defined as information that is not publicly available and personally identifiable information as defined in the Family Education Right and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).

Inferences. Insights that we use to build a profile about you. Includes profiles, preferences, and behaviors drawn from the collection and analytics of any of the other categories of personal information collected.

The sources from which SAFRA collects this personal information include, but are not limited to:

Directly from you or your authorized parties or agents when you provide it to us. Authorized parties or agents include, but are not limited to, parties such as attorneys, guardians, and those with powers of attorney.

Affiliates, Service Providers and Third Parties such as law enforcement authorities.

Government Agencies

Credit Reporting Agencies, such as Trans Union.

Public sources to the extent this information is public.

Our Websites and Mobile apps, or any time you visit, use, or interact with any of the features or services available on our mobile or online applications.

Data Analytics Providers, including consumer data resellers.

The business or commercial purposes for which SAFRA may disclose or use your personal information include, but are not limited to:

For all the stated purposes above which Safta may collect personal information.

Risk Management. Audit, compliance, financial, legal controls, and other risk-management related or regulatory obligations under applicable law. In addition to corporate audit, vendor management, and to our interaction with you and concurrent transactions.

Debugging/Repair Activity. Debugging to identify and repair errors that impair, or may impair, existing system and application functionality.

Information Security and Fraud Prevention. Detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that the use of your Personal Information is reasonably necessary and proportionate for this purpose.

Operation of Our Website. Communicating and interacting with you.

Legal Proceedings. Exercising and defending legal rights.

Short Term Transient Use for Our Purposes.

Security and Investigations. Physical security and safety of our premises (including records of visits to our premises and CCTV recordings); electronic security, detecting, investigating, and preventing breaches of policy, and criminal offenses, in accordance with applicable law

For Services Performed on Our Behalf by a Service Provider. Performing services on behalf of a business for which SAFRA is a service provider. Includes, but is not limited to, maintaining, or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, advertising, marketing, or analytic services, or providing such similar services on behalf of a business or service provider.

IT Operations. Management of our communications systems, IT security, and audits.

Marketing. Communication with you via any means, including email, telephone, and text messages, subject to ensuring that such communications are provided to you in compliance with applicable law.

The categories of third parties with whom SAFRA may disclose personal information, and the categories of personal information that may be disclosed with such third parties include, but are not limited to:

You or Your Authorized Agents or Parties: Personal information categories include: identifiers, customer legal records, class characteristics and commercial information.

Affiliates and Subsidiaries: All categories of personal information collected.

Internet Service Providers: Internet or other electronic network activity information, geolocation data, electronic information.

Advertising Networks: Internet or other electronic network activity information, geolocation, identifiers, customer records not protected by law, commercial

information, inferences.

Data Analytics Providers: Identifiers.

Service Providers: Including nonaffiliated entities providing operating systems, platforms, and other services to support day-to-day operations. All categories of personal information collected.

Government, Regulatory, or Legal Authorities: Any categories of personal information collected, subject to legal process or proceedings, can be disclosed.

SAFRA has established information retention guidelines that define consistent minimum standards and requirements for the length of time information and records are to be maintained. Standards and procedures for determining the duration for which we will retain your personal information include your ongoing relationship with us, compliance with applicable legal and regulatory requirements, retention policy, relevant legal claims, and whether you choose to exercise your rights, subject to exceptions. Once the periods above have concluded, each to the extent applicable or permitted by applicable law, we will permanently delete or destroy the relevant personal information or archive your personal information so that it is beyond use.

We do not offer an opt-out from the sale of personal information because we do not sell personal information as defined by the CCPA (and have not done so in the last 12 months). We do not knowingly collect or share personal information from children under sixteen (16) years of age without parental consent. Under CCPA, a "sale" means the disclosure of personal information to a third party for monetary or other valuable consideration. "Share" or "Sharing" when used in this policy has the meaning of the term in the CCPA: The disclosure of personal information to a third party for cross-contextual behavioral advertising, whether or not for monetary or other valuable consideration. We do not offer a right to limit our use and disclosure of Sensitive Personal Information because we do not use or disclose Sensitive Personal Information in such a manner as to require provision of the right (specifically, for purposes of inferring characteristics about an individual).

We may change this disclosure from time to time. When we do, we will communicate the changes by appropriate means, such as by posting the revised disclosure on our CCPA web site with a new "Last Updated" date.

Personal information does not include:

- Publicly available information. "Publicly available information" means information that is lawfully made available from federal, state, or local government records or information SAFRA has a reasonable basis to believe is lawfully made available to the general public by a consumer or from widely distributed media, or by the consumer; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience;
- Truthful information that is a matter of public concern;
- Consumer information that is deidentified or aggregate, as those terms are defined by the CCPA; and
- Information otherwise exempt from the CCPA, such as personal information collected, processed, sold, or disclosed subject to the federal Gramm-Leach-Bliley Act and implementing regulations.

* Our affiliates include those companies that control, are controlled by or under common control with SNBNY Holdings Ltd, such as financial companies, registered broker dealers, investment advisors, and insurance agencies.

Rights for California Residents

The California Consumer Privacy Act (CCPA) provides California residents rights regarding the collection and use of their personal information, subject to certain exceptions. An authorized party may submit requests on your behalf. An authorized agent is a natural person, or a business entity registered with the Secretary of State to conduct business in California, that you have authorized to act on your behalf.

Your CCPA Rights

As a California resident, covered by the CCPA, you have the right to:

- Receive this Notice at or before the point of collection of your Personal Information.
- Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - the categories of personal information we have collected;
 - the categories of sources used to collect the personal information;
 - the business or commercial purposes for collecting your personal information;
 - the categories of recipients with whom we share your personal information, including for cross-contextual behavioral advertising purposes; and
 - the specific pieces of personal information we have collected about you.
- Request we correct inaccurate Personal Information in certain circumstances that we maintain about you.
- Request on legitimate grounds that we delete Personal Information we collected from you; some of the CCPA exceptions may apply.
- To opt out of our sharing your personal information for the purpose of cross-contextual behavioral advertising
- Be free from unlawful discrimination for exercising your rights under the CCPA.

How to Exercise Your Rights Under the CCPA

To exercise one or more of your rights, you, or someone you authorize to make a request on your behalf, may contact your Account Officer or call us at (855) 723-7269 (1-855-SAFRANY) or access the CCPA Request on SafraLink. Additional detail is available in our Frequently Asked Questions, including information relating to:

- How to submit a rights request
- How to authorize someone else to submit a rights request on your behalf
- What to expect after submitting a request

Requests for specific pieces of Personal Information will require additional information to verify your identity. For individuals submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom the request is made.

In some instances, we may not be able to honor your request. For example, we will not honor your request (i) if we cannot verify your identity, or we cannot verify that you have the authority to make a request on behalf of another person; (ii) when an exception applies or (iii) where the personal information that we maintain about is not subject to the CCPA's access or deletion rights.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

Frequently Asked Questions

Who does CCPA apply to?

CCPA applies to California residents only. For purposes of CCPA, a California resident is a person who is in California for a purpose that is not temporary or transitory or is domiciled in California but is outside of the state for a temporary or transitory purpose. The rights described above do not apply to residents of other U.S. states or persons who reside outside of the United States.

How do I submit my request?

You can send your request via mail. Please include your full name, contact information, and details of your request, and send it to:

Safra National Bank of New York
Ref: CCPA Request
546 Fifth Avenue – 4th Floor
New York, NY 10036

What doesn't the CCPA apply to?

Certain activities, information, and circumstances involving the collection, use, processing, sale, or disclosure of personal information are exempt or excluded from CCPA. CCPA exemptions and exclusions include, but are not limited to:

- Personal information collected or sold if every aspect of the commercial transaction takes place wholly outside of California.
- Deidentified or aggregate consumer information.
- GLBA: The CCPA does not apply to personal information collected, processed, sold or disclosed subject to the Gramm-Leach-Bliley Act and its implementing regulations (GLBA). GLBA is the federal law that regulates the collection, disclosure, and safeguarding of individuals' nonpublic personal information who obtain financial products or services primarily for personal, family, or household purposes from a financial institution. For example, if you are a California resident and you have a personal financial product with us, such as a personal credit card, the CCPA rights do not apply to the personal information associated with that account. There are other types of personal information that are not covered by the rights and limitations in the CCPA.
- Fair Credit Reporting Act: CCPA does not apply to any activity involving the collection, maintenance, disclosure, sale, communication, or use of any personal information bearing on an individual's creditworthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency, user or furnisher of consumer reports as defined under the Fair Credit Reporting Act.

What can I expect if I exercise any of my rights?

Opt-Out Request

SAFRA does not "sell" your personal information or "share" your personal information for cross-context behavioral advertising. Therefore, if you exercise your right to opt-out of "sales" or "sharing," you will not receive a confirmation from us. Consistent with applicable law, we will opt you out of sales and sharing at your request.

Request to Know and Access

Consistent with applicable law, you will receive a response to your verified request within 45 days of submission, unless we notify you prior to the end of those 45 days that the delivery date of the response will be extended by an additional 45 days. Along with the response to the verified request, you will receive a copy of certain information SAFRA has collected on you during the 12 months immediately preceding the date of your verified request. This will include any information provided in your verified consumer request form. SAFRA is not obligated to provide a response more than twice in a 12-month period; this period begins upon your first submission of the verified consumer request.

Request to Correct

You will receive confirmation of your correction request within 45 days of submission, unless we notify you prior to the 45-day period that the delivery date of confirmation will be extended by an additional 45 days. Consistent with applicable law, we will correct your information at your request.

Deletion Request

You will receive a response to your verified request within 45 days of submission, unless we notify you prior to the end of those 45 days that the delivery date of the response will be extended by an additional 45 days. Consistent with applicable law, we will delete your personal information in response to your request.