



## **DATA COLLECTION NOTICE**

Effective Date: January 29, 2021

Here at Centier, you are treated as family, so we respect and value your privacy. We understand that your data is important to you, and because of that, it is also of utmost importance to us. We treat your data with integrity and are dedicated to ensuring you are aware of our data collection practices.

This Data Collection Notice applies solely to individuals who reside in the State of California (“consumers” or “you”). This Data Collection Notices does not apply to personal information outside the scope of the CCPA, including: (1) personal information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act (“GLBA”) and implementing regulations, or the California Financial Information Privacy Act; and (2) personal information bearing on a consumer’s credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living as set forth in the Fair Credit Reporting Act.

Centier also handles and uses personal information collected from its customers in accordance with our GLBA Privacy Notice.

### What Information We Collect

We may have collected the following categories of your personal information in the previous twelve (12) months:

- Personal Identifiers
- Legally Protected Characteristics
- Commercial Information
- Biometric Information
- Internet or Other Electronic Network Activity Information
- Geolocation Information
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment Information
- Education Information
- Inferences Drawn to Create a Profile

### How We Use Information

By collecting the above categories of data, we are able to offer you our products and better understand how we can be of service to your needs. Your data may be collected at various points. Such points include, but are not limited to, applying for a business loan, opening a new business account, transferring funds from one account to another, visiting our website, or



contacting our Client Service Center. We will use your data in order to fulfill our business purposes, such as maintaining your business accounts and responding to your inquiries. We will also use your data to advertise or market to you, to secure and monitor our websites, for conducting surveys, to conduct giveaways, and for our own legal obligations.

#### How We Share Information

The below chart lists the categories of personal information that we may share and have shared in the past twelve (12) months.

Categories of Personal Information	Categories of Services Providers and Third Parties with whom Personal Information is Shared
Personal Identifiers	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; data analytics providers; prospective purchasers of our business; outside auditors and lawyers; and social networks.
Legally Protected Characteristics	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; prospective purchasers of our business; and outside auditors and lawyers.
Commercial Information	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; prospective purchasers of our business; and outside auditors and lawyers.
Biometric Information	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; and prospective purchasers of our business.
Internet or Other Electronic Network Activity Information	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; data analytics providers; and social networks.
Geolocation Information	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; data analytics providers; and social networks.
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	Entities that we are required to share with pursuant to law or for legal proceedings; and service providers.



Professional or Employment Information	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; and prospective purchasers of our business.
Education Information	Entities that we are required to share with pursuant to law or for legal proceedings; service providers; and prospective purchasers of our business.
Inferences Drawn to Create a Profile	Service providers; data analytics providers; and social networks.

Where We Collect Information From

Centier may collect personal information from the following sources: you, your agent, our other customers, service providers, data analytics providers, and social networks.

Our privacy team is happy to answer your questions about data collection and can be reached at [privacy@centier.com](mailto:privacy@centier.com). If you have a question about your account, please call our Client Service Center at 1-888-236-8437. We look forward to continuing to serve you and your data.

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