

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS of Industrial and Commercial Bank of China (USA) NA (collectively, “we,” “us,” or “our”) applies solely to consumers who reside in the State of California (“consumers” or “you”). We adopt 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.

Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”).

Since we are a financial institution subject to the Gramm-Leach-Bliley Act (GLBA), the personal information we collect comes from either: (1) GLBA consumers, (2) non-GLBA consumers subject to the temporary exemptions (i.e., Business customers and job applicants/employees), or (3) CCPA covered Consumers.

Below lists the categories of personal information we collected within the last twelve (12) months.

Category	Examples	Collected from GLBA Consumer?	Collected from Non-GLBA Consumer subject to the temporary exemptions?	Collected from CCPA covered Consumers?
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	YES	NO
B. Personal information categories listed in the California Customer	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's	YES	YES	NO

<p>Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</p>			
<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>YES</p>	<p>YES</p>	<p>NO</p>
<p>D. Commercial information.</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>YES</p>	<p>YES</p>	<p>NO</p>
<p>E. Biometric information.</p>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other</p>	<p>YES</p>	<p>YES</p>	<p>YES</p>

	physical patterns, and sleep, health, or exercise data.			
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	YES	NO
G. Geolocation data.	Physical location or movements.	YES	YES	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	YES	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES	YES	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	NO	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	NO	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

Exclusions from the CCPA's scope

Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) are excluded from CCPA's scope and, therefore, are not subject to the protections under the CCPA.

Categories of Sources from Which We Collect

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you.
- Gathered, with your permission, from reporting agencies.
- Directly and indirectly from activity on your online banking or mobile application.

How We Use Personal Information

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

- To respond to your inquiries and fulfill your requests.
- To inform you about important information regarding the benefits, products, and services for which you apply or may be interested in applying for, or in which you are already enrolled.
- To inform you of changes to terms, conditions, and policies or other administrative information.
- To allow you to apply for benefits, products, or services and evaluate your eligibility for such products or services.
- To verify your identity or location (or the identity or location of your representative or agent) in order to allow access to your accounts, conduct online transactions, and maintain measures aimed at preventing fraud and protecting the security of account and Personal Information
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

How We Share Personal Information

We may disclose your personal information to a third party for the following business purposes: (1) as necessary to effect, administer, or enforce a transaction that you request or authorize; (2) in connection with servicing or processing a financial product or service that you request or authorize;

(3) maintaining or servicing your account; or (4) in connection with a proposed or actual securitization, secondary market sale (including sales of servicing rights), or similar transaction related to a transaction of yours.

When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose other than performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for the business purposes listed above:

Category A: Identifiers.
Category B: California Customer Records personal information categories.
Category C: Protected classification characteristics under California or federal law.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, our privacy policies, or the ways in which we collect and use your personal information please do not hesitate to contact us by:

- Calling us: 833-502-1234
- Email: consumerprivacy@icbc-us.com
- Mail: Industrial and Commercial Bank of China (USA) NA
Attn: CCPA Compliance
1185 Avenue of the Americas, 16th Floor
New York, NY 10036

You can also speak to a customer representative at your local branch of the Bank.