



California Consumer Privacy Act Consumer Privacy Policy for California Residents (Effective November 1, 2025)

West Coast Community Bank (Bank) and West Coast Community Bancorp (collectively, "Bank," "our," "we," or "us") have adopted this Consumer Privacy Policy for California Residents ("Consumer Privacy Policy" or "Policy") to comply with the California Consumer Privacy Act of 2018 and, as amended by, the California Privacy Rights Act of 2020 (collectively "CCPA"). Your privacy is important to us. This California Privacy Policy explains how we collect, use, and disclose personal information relating to California residents covered by the CCPA. This Consumer Privacy Policy is provided pursuant to, and terms described within are consistent with those terms as defined by the CCPA and its implementing regulations under California Civil Code Section 1798.100 *et seq.*

Introduction and Applicability of this Consumer Privacy Policy

West Coast Community Bank collects Personal Information ("PI"), as defined by the CCPA, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household. 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.

This Consumer Privacy Policy does not apply with respect to information that is subject to the Gramm-Leach-Bliley Act ("GLBA"); it supplements the information contained in the Bank's Online Privacy Policy Statement and the GLBA Privacy Notice. For example, this Consumer Privacy Policy does not apply with respect to 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 relating to those financial products and services, please refer to our [GLBA Privacy Notice](#).

Links to Other Web Sites: Our website may feature hyperlinks to third party websites that offer products, services or information. When you click on one of these hyperlinks, you will be leaving our site and will no longer be subject to this Policy. In no event shall West Coast Community Bank be responsible for your use of a hyperlinked site or the information collection practices of the other websites that you visit. We urge you to review their privacy policies before you provide them with any personally identifiable information. Third party websites may collect and use information about you that is different from this Policy.

Collection, Use and Disclosure of Personal Information

We may collect the following categories of PI from you and about you and use these categories of personal information for certain business or commercial purpose(s) as described in our Privacy Policies as well as for CCPA. We may have collected and used your personal information during the twelve (12) month period prior to the effective date of this Policy. The Bank may also disclose your personal information to a third party/service provider for a business purpose. When we disclose personal information for a business purpose, we enter into a contract with a service provider that describes the purpose and requires the service provider to both keep that personal information confidential and prohibits the service provider from retaining, using, or disclosing the information for any purpose other than the specific purpose of performing the services specified in the contract for the Bank.

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

- Identifiers: 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

- Personal information as defined in the California Customer Records statute - CA Civil Code §1798.80(e): Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, such as name, signature, social security number, address, telephone number, passport number, driver's 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;
- Protected classifications under California or federal law: such as sex and marital status
- Commercial Information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Biometric information: such as biological or behavioral characteristics, health or exercise data
- Internet or electronic network activity: Browsing history, search history, and information on a consumer's interaction with website or application
- Geolocation: such as device location
- Sensory data: Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information: such as current or past employment history
- Information (Non-public education defined in Family Educational Rights and Privacy Act - 20 USC §1232g, 34 CFR Part 99): Education records directly related to a student and maintained by an educational agency/institution or by a party acting on their behalf.
- Inferences drawn from other personal information: Profile created reflecting references, characteristics, attitudes, abilities, aptitudes, psychological trends, predispositions, intelligence, etc.
- Sensitive Personal Information: Personal Information that reveals any of the information listed in the above categories (and in the table below), unless publicly available.

The categories of sources from whom we have obtained the Personal Information include:

- Directly from you
- Other individuals such as authorized agents or family members
- Vendors or service providers who provide services on our behalf
- Consumer reporting agencies
- Applications for Bank products and services, government issued documents, employment-related documents
- Public Record sources such as Federal, State or Local Government entities and other publicly available sources
- From your devices, such as when you visit our website, online and mobile applications

In the last 12 months, we have used Personal Information relating to California residents to accomplish our business purpose purpose(s) and objectives, to operate, manage and maintain our business, to provide our products and services, including the following:

- Performing services including maintaining or servicing accounts; providing customer service, processing or fulfilling orders and transactions; verifying customer information; processing payments, providing analytics services; or providing similar services
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured for, or controlled by us

The categories of third party/service providers with whom we have disclosed Personal Information for our business purpose(s) described above, include:

- Vendors and service providers who provide services on our behalf
- Professional services organizations, such as auditors and law firms
- Our business partners provide services such as payment, banking and communication infrastructure, operating systems and platforms, storage, legal expertise, and consumer reporting agencies
- Internet service providers
- Data analytics providers
- Government Agencies as required by laws and regulations

The table below summarizes the categories of personal information ("PI") including sensitive personal information West Coast Community Bank collects, the categories of sources from which that personal information may have been collected, the business or commercial purpose(s) for which the information was collected, and categories of third parties to whom the Bank disclosed personal information.



Category	From Source Collected	Business or Commercial Purpose for Collecting the Information	Categories of Third-Party Recipient (Disclosures)
Identifiers. Examples: 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, state identification card, passport number, or other similar identifiers	▪ Directly from you ▪ Applications for Bank products and services, tax returns, pay stubs, credit reports, government issued documents, employment related documents ▪ From other online and offline sources, such as government agencies and other databases, social media platforms and other third parties ▪ Vendors/service providers who provide services on our behalf ▪ Other Individuals such as authorized agents or family members	To open or decline your deposit and/or loan requests, and/or to maintain or service your account(s)/products and services you have with us or respond to your request(s). Information may also include email providers for sending Bank promotional content.	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)). Examples: name, signature, social security number, physical characteristics or description, address, telephone number, driver's license or state identification card number, passport number, insurance policy number, education, bank account number, credit card number, debit card number, or other financial information	▪ Directly from you ▪ Applications for Bank products and services, tax returns, pay stubs, credit reports, government issued documents, employment related documents ▪ From other online and offline sources, such as government agencies and other public databases, social media platforms and other third parties ▪ Vendors/service providers who provide services on our behalf ▪ Other Individuals such as authorized agents or family members	To open or decline your deposit and/or loan requests, and/or to maintain or service your account(s)/products and services you have with us or respond to your request(s). Information may also include email providers for sending bank promotional content.	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting
Protected classification characteristics under California or federal law and Information that reveals an individual's racial or ethnic origin. Examples: Age (40 years or older), race, citizenship, immigration status, marital status, sex, or veteran or military status	▪ Directly from you ▪ Applications for Bank products and services, tax returns, pay stubs, credit reports, government issued documents, employment related documents ▪ From other online and offline sources, such as government agencies and other public databases, social media platforms and other third parties	To maintain or service your account, respond to your request, other legal requirements, or for employment related purposes	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required)

	▪ Vendors/service providers who provide services on our behalf ▪ Other Individuals such as authorized agents or family members		▪ Outside companies in connection with required reporting.
Commercial Information. Examples: Records of personal property, products or services purchased, obtained, or considered or other purchasing or consuming histories or tendencies	▪ Directly from you ▪ Applications for Bank products and services, tax returns, pay stubs, credit reports, government issued documents, employment related documents ▪ From other online and offline sources, such as government agencies and other public databases, social media platforms and other third parties ▪ Vendors/service providers who provide services on our behalf Other Individuals such as authorized agents or family members	To open or decline your deposit and/or loan requests, and/or to maintain or service your account(s)/products and services you have with us or respond to your request(s).	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting
Biometric information and Processed Biometric data. Examples: fingerprints, facial recognition, voiceprints and behavioral patterns	▪ Directly from you ▪ From other online and offline sources, such as government agencies and other public databases, social media platforms and other third parties ▪ Vendors/service providers who provide services on our behalf	To verify identification for identification purposes in order to service your bank accounts and limit losses due to fraud	▪ Our service providers or contractors and other parties as required or permitted by law. ▪ Organizations used in connection with human resource activities and workforce management
Internet or other similar network activity. Examples: Browsing history, geolocation, search history, information on a consumer's interaction with a website, application, or advertisement, or the contents of personal messages where the Bank is not the intended recipient	▪ Web browser data and computer IP addresses, emails, texts ▪ Information on a consumer's interaction with a website ▪ Device contacts from online banking and mobile banking applications	▪ To assist us in identifying potential Bank products and/or services of interest, or to investigate malware / hacking attempts, or for operational purposes ▪ To support internal operations of our website or mobile applications. ▪ To facilitate payments (e.g., Zelle)	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting
Geolocation data including precise geolocation. Examples: Device and/or physical location	Mobile applications	To assist you in locating one of our branches or ATMs, or for other operational purposes	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law

			▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting.
Audio and visual information. Examples: Audio, electronic, visual, or similar information	▪ Directly from you ▪ Vendors/service providers who provide services on our behalf ▪ Photos	▪ For operational, commercial, quality assurance, and security purposes ▪ To deposit checks	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Organizations used in connection with human resource activities and workforce management
Employment Information. Examples: Professional or employment-related information, such as current or past work history, employer, information from background checks, resumes, and personnel files	▪ Directly from you ▪ Applications for Bank products and services, tax returns, credit reports, and government issued documents, employment related documents	To open or decline your deposit and/or loan requests, and/or to maintain or service your account(s), or respond to your request(s), or for employment related purposes	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Organizations used in connection with human resource activities and workforce management
Education Information. Examples: Education history, licenses and certifications	▪ Directly from you ▪ Applications for Bank products and services, government-issued documents, employment-related documents	To open or decline your deposit and/or loan requests, and/or to maintain or service your account(s), or respond to your request(s), or for employment related purposes	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Organizations used in connection with human resource activities and workforce management

Inferences. Example: Profile created about a consumer reflecting the consumer's preferences, characteristics, psychological trends, behavior, attitudes, intelligence, abilities, and aptitudes	▪ Directly from you ▪ From other online and offline sources, such as government agencies and other public databases, social media platforms and other third parties ▪ Vendors/service providers who provide services on our behalf	Information from other categories may be used to make decisions and form opinions, and assist us in identifying potential products and services of interest	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting
Sensitive Personal Information Examples: ▪ Consumer's social security, driver's license, state identification card, or passport number; ▪ Account Log-in, financial account, debit or credit card number in combination with any required security or access code, password or credentials; ▪ Precise geolocation; ▪ Racial or ethnic origin, religious or philosophical beliefs, or union membership; ▪ Contents of mail, email, and text messages unless we are the intended recipient of the communication; ▪ Biometric information; and ▪ Health information, sexual orientation.	▪ Directly from you or an authorized agent or family member ▪ Applications for Bank products and services, government issued documents, employment-related documents ▪ Directly and indirectly from activity on our website, online banking and mobile applications ▪ From other online and offline sources, such as government agencies and other public databases, social media platforms and other third parties ▪ Vendors/service providers who provide services on our behalf	▪ To open or decline your deposit and/or loan requests, and/or to maintain or service your account(s), or respond to your request(s), or for employment-related purposes ▪ Detecting security incidents, protecting against malicious deceptive, fraudulent, or illegal activity, and prosecuting those responsible for such activity ▪ To maintain, improve, upgrade or enhance our products and services ▪ Debugging to identify and repair errors that impair existing intended functionality ▪ Complying with federal, state and local laws and regulations	▪ Our service providers or contractors who help provide certain products and services, complete transactions and support our everyday operations, such as: professional services organizations, including auditors and law firms, our business partners, operating systems and platforms, credit report providers, and other parties as required or permitted by law ▪ Representatives of California residents ▪ Government, regulatory agencies and law enforcement requests (when required) ▪ Outside companies in connection with required reporting ▪ Organizations used in connection with human resource activities and workforce management



Marketing

We may use your personal information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send, or you can contact us using the contact details provided in the "Contact Us" portal on www.wccb.com. You will continue to receive service-related messages concerning products and services you have obtained from us (unless we have indicated otherwise).

California Consumer Privacy Rights

The CCPA grants to individual California consumer residents, the rights outlined below subject to some exclusions.

Right to **Limit** Use or Disclosure of Personal Information. California residents have the right to direct us to use or disclosure sensitive personal information only for providing products or services, or as otherwise minimally permitted under applicable law. However, West Coast Community Bank does not use or disclose sensitive personal information for any purpose other than providing our products and services to you, or as otherwise minimally permitted under applicable law

Right to **Opt-Out** of Sale or Sharing. The CCPA defines "selling" or "sale" of personal information as selling, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for monetary or other valuable consideration. The term "third party" does not include our service providers or contractors when we have a written contract in place with such service providers or contractors that meets certain requirements set forth in the CCPA. This means that our service providers or contractors are not considered "third parties" for CCPA purposes. In the past twelve (12) months, West Coast Community Bank did sell any Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. In addition, the Bank will not sell any Personal Information subject to the CCPA. As the Bank does not and will not sell Personal Information, there is no available Opt-out process to follow.

Sharing Personal Information for Cross-Context Behavioral Advertising. Cross-context behavioral advertising refers to the targeting of advertising to a consumer based on the consumer's personal information obtained from the consumer's activity across businesses, distinctly branded websites, applications, or services, other than the business, distinctly branded website, application, or service with which the consumer intentionally interacts. We will not share your personal information for cross-context behavioral advertising purposes.

Right to **Correct**. If you are a California resident, you have the right to request that we correct inaccurate personal information collected and maintained in its records.

Right to **Know**. If you are a California resident, you have the right to request, twice in a twelve (12) month period, that we disclose to you free of charge certain information about our collection and use of your personal information over the past twelve (12) month period:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

The Bank will disclose to you the information specified above once we have received and confirmed your verifiable consumer request. We have the right to request verification of your identity for all requests for information.

Right to Equal Services and Price. You have the right to receive equal service and price, even if you exercise a privacy right.

The Bank will not discriminate against you for exercising any of your rights under the CCPA, including, but not limited to:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Right to Delete. If you are a California resident, you have the right to request that we delete certain personal information we have collected from you and retained. Once we have received your request and verified your identity, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- Comply with a legal obligation.
- Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

How to Submit a Request

If you wish to submit a request to exercise your rights described above, you may:

1. Submit a request through the Bank's website on the [Contact Us](#) page
2. Make a request by mail:
West Coast Community Bank
Attn: Compliance Department
75 River Street
Santa Cruz, CA 95060
3. Call us toll-free at 855.645.7500 (Request Bank's Compliance Department)
4. Visit any of our locations

We will acknowledge receipt of your request within 10 business days and advise you how long we expect it will take to respond if we are able to verify your identity. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. Requests for specific pieces of personal information will require additional information to verify your identity. Additionally, if you ask us to provide you with specific pieces of information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is subject to the request.

If your identity cannot be verified we will attempt to contact you to gather additional information. We will advise you in our response if we are not able to honor your request. We will also notify you if your request has been denied due to the Bank's inability to verify your identity. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification 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.

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.

To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

Authorized Agent. California residents may authorize an agent to submit rights requests on behalf of the resident. If you submit a request on behalf of a California resident, we will require proof of such agent authorization and verification of identity directly from the person for whom you are submitting a request. Such authorization from the consumer must be notarized.

Changes to this Policy

We reserve the right to amend our Consumer Privacy Policy at our discretion and at any time. When we do, we will post the revised policy on our website. This Consumer Privacy Policy is effective on June 1, 2025.

Questions or Concerns

You may contact us with questions or concerns about this Policy, or with our privacy practices by email at ComplianceDepartment@wccb.com or writing us at:

West Coast Community Bank
Attn: Compliance Department
75 River Street
Santa Cruz, CA 95060