

California Consumer Privacy Act Notice

Effective Date: June 28, 2024

This California Consumer Privacy Act Notice explains how Citizens collects, uses, and discloses personal information relating to **California residents** covered by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). This “Notice” constitutes our notice at collection and our privacy policy pursuant to the CCPA. If you are a Job Applicant, please refer to the Job Applicant Data Privacy Policy. If you are an employee, contractor, or intern, please refer to the Employment Data Privacy Policy.

What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident.

Please note, however, that the CCPA does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”), the Fair Credit Reporting Act (“FCRA”) or Health Insurance Portability and Accountability Act (“HIPAA”). 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. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our [Consumer Privacy Notice](#).

Our Collection, Use, Disclosure and Retention of Personal Information

1. Categories of Personal Information We Collect

The categories of Personal Information that Citizens has collected in the preceding 12 months include:

- Contact Information and other personal identifiers such as name, postal address, telephone number, social security number, passport number, driver’s license number or state identification card, birth date, email address, online and device identifiers and Internet Protocol address.
- Account Information such as your account number, transaction history, credit card number, debit card number, username and password, and PIN.
- Financial Information such as your income, investment preferences, and information about your financial standing such as credit score and credit history.
- When you authorize us to do so, we may collect the names, telephone number and/or email address of your mobile contacts to facilitate a payment to your contact(s) through one of our Services.
- Professional or employment information such as current and prior employers and income.
- Education information such as degrees held and years of schooling.
- Characteristics of protected classifications, such as gender, citizenship, and marital status.
- Precise geolocation data, such as device location.
- Audio, electronic, visual, or similar information, such as photographs you share, branch security video, and customer service audio recordings.
- Internet, device, or electronic network activity information such as your browsing and search history, mouse movements, scrolling, mouse clicks and keystrokes, browser type, and interactions with websites and advertisements.
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, and individual’s preferences and characteristics.

- Sensitive Personal Information, such as driver's license, state identification card, or passport number, precise geolocation (within a radius of 1,850 feet), and information on racial or ethnic origin.

We only collect and process Personal Information that is Sensitive Personal Information under the CCPA for the purposes set forth in Section 3. We do not collect or process Sensitive Personal Information with the purpose of inferring characteristics about you and/or in a manner that would trigger a right to limit under the CCPA.

2. Sources of Personal Information

The categories of sources from which we may collect Personal Information depends on our relationship or interaction with you, and the business purpose for which the Personal Information is collected.

During the 12-month period prior to the Effective date of this Notice, we may have obtained Personal Information about you from the following sources:

- Directly from you, a California resident, or your representative.
- Our affiliates or subsidiaries.
- Our Service Providers and third parties who provide it to us (e.g., our customers, credit reference agencies and law enforcement authorities).
- Public records or public sources.
- Your devices, such as when you visit our websites or use our mobile applications.
- Joint marketing or other commercial business partners.
- Online advertising networks and cookies/ automatic data collection technologies.

3. Purposes for Our Collection

The purposes for which we collect, use, and disclose Personal Information depend on, among other things, our relationship or interaction with a specific California resident and is described in the **How We Use Your Information** section above. Specifically, we collect Personal Information to process transactions and administer your account, communicate with you, prevent fraud and other harms, to provide, market, and develop our products and services, for our internal business operations, to comply with law, and in accordance with our financial services Consumer Privacy Notice and other agreements.

4. Retention of Personal Information

The length of time that we intend to retain each category of Personal Information will depend on a number of criteria, including (i) the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain Personal Information in order to accomplish the business or commercial purpose(s) for which such Personal Information is collected, used or disclosed (as indicated in this Notice), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

5. Categories of Personal Information Disclosed for Business Purposes

As described in the **How We Share Your Information** section, we disclose information for business purposes with third parties who are considered “service providers” as defined under California law since we disclose Personal Information to them for our business purposes.

During the 12-month period prior to the Effective date of this Notice, we may have disclosed the following categories of Personal Information about you to our affiliates and subsidiaries, our service providers, governmental authorities, professional advisors, and parties involved with business transfers as follows.

- Identifiers, such as name, address, and Social Security Number.
- Characteristics of protected classifications under California or federal law, such as sex and marital status.
- Commercial information: such as products or services purchased, obtained, or considered, other purchasing or consuming histories or tendencies.
- Employment information such as current and prior employers and incomes.
- Education information such as degrees held and years of schooling.
- Internet or network activity information, such as browsing history and interactions with our website.
- Geolocation data, such as device location.
- Audio, electronic, visual, or similar information, such as photographs you share, branch security video, and customer service audio recordings.
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, and individual's preferences and characteristics.
- Sensitive Personal Information, such as driver's license, state identification card, or passport number, precise geolocation (within a radius of 1,850 feet), and information on racial or ethnic origin.

The categories of service providers to which we may share the above-described categories include Payment Processing Companies, Data Analytics Providers, Fraud Prevention Providers, Cloud Storage Providers, IT Service Providers, Professional Service Providers, Delivery Partners, and Marketing Companies.

6. Selling and Sharing of CA Personal Information

As described above in the **How We Share Your Information** section, we may share the following categories of Personal Information with third parties who are considered "third parties" as defined under California law since we disclose Personal Information to them which they may use for cross context behavioral advertising. Our disclosure of Personal Information to the third parties who use the information for these purposes may constitute a "sharing" of Personal Information as defined under California law. Please note that we do not "sell" Personal Information in the traditional sense.

In the 12 months prior to the Effective date of this Notice, we shared for cross context behavioral advertising and may continue to share, the following categories of Personal Information:

- Identifiers, such as name and contact information.
- Internet or network activity information, such as browsing history and interactions with our website.

The categories of third parties to which we may share (as defined by California law) the above-described categories of Personal Information include online Advertising Networks, Marketing Companies, and Social Media Companies. Please note, we do not knowingly sell or share the Personal Information of individuals under the age of 16.

Please see our **How to Exercise Your Rights** section below on how to opt-out of the sharing of your Personal Information.

7. Rights under the CCPA

If you are a California resident covered by the CCPA, you have the following rights:

- **Right to Know and Access.** To request a disclosure of the categories of Personal Information that have been collected; the categories of sources from which the information was collected; the business or commercial purpose for collecting, selling, or sharing the Personal Information; the categories of third parties to whom the business discloses Personal Information; and access to the specific pieces of Personal Information Citizens has collected about you in a portable format.

- **Right to Request Deletion of Personal Information.** To request that Citizens delete Personal Information that we have collected from you, subject to certain exceptions provided under the CCPA.
- **Right To Correct Inaccurate Personal Information.** To request that Citizens correct any inaccurate Personal Information that it maintains about you.
- **Right to Opt-Out of the Sale of Personal Information or Sharing of Personal Information for Cross-Context Behavioral Advertising.** Our use of cookies or other tracking technologies for cross-contextual advertising purposes is deemed a “sale” or “share” of Personal Information under the CCPA.
- **Right of No Retaliation Following Opt-Out or Exercise of Other Rights.** To not be denied a product or service, charged a different price or rate, denied a discount or other benefit because the consumer exercised any of his/her rights under the CCPA.
- **Automated Processing.** Under certain circumstances, you have the right to object to a significant decision based solely on automated processing (i.e., without human intervention) unless that decision is required or authorized by law.
- **Right to Opt-Out of our Use of your Sensitive Personal Information (in certain instances and if permissible under applicable law).** We do not disclose sensitive personal information for purposes other than those which cannot be limited under applicable law.

How to Exercise Your Rights

In order to exercise your Right to Opt-Out of the Selling or Sharing of your Personal Information, please visit our “Do Not Sell or Share My Personal Information” link located at the footer of our Site. In order to exercise your other rights described above, please navigate to our online web portal available at [CCPA Privacy Rights Portal](#) or by calling us at 1.888.999.1927.

Please also note that prior to processing your request and to protect your Personal Information, Citizens will perform reasonable processes to verify your identity which will require you to provide certain information for us to confirm against independent sources.

To authorize an agent to exercise your privacy rights on your behalf, your authorized agent can submit a request by calling 1-888-999-1927. We may require proof from your authorized agent, such as a Power of Attorney and other information for verification of identity.

Please note that Citizens does not collect or process household information. For inquiries and requests related to households you can contact 1.888.999.1927.