

PRIVACY STATEMENT-CALIFORNIA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of FIRST BANK & TRUST (“we”, “us”, or “our”) and applies solely to customers, users, and other individuals 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 – including the term “consumer”-have the same meaning when used in this notice.

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”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A -Identifying Personal Information.	<ul style="list-style-type: none"> • Name • Date of Birth • Home Address • Telephone numbers (personal) • Social Security Number • Driver License number or State ID number • Military ID or Passport as alternative to Driver License/State ID • Military status for Covered Borrower • Email address 	YES
B -Personal information per California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<ul style="list-style-type: none"> • Employer’s Name and Address • Work phone number • Job Title • Pay Frequency & Use of Direct Deposit • Date of most recent paycheck/or other primary income payment (loan applicants only) • Primary Source of Income if not Employed • Net monthly/pay period income (loan applicants only) • Estimated monthly/pay period expenses • Bank/Credit Union name, Routing Number & Checking or Share Account Number • Debit Card Number • Consumer physical characteristics/description as set forth on ID provided • Consumer signature as set forth on ID provided & certain transaction documents • Names, addresses, phone numbers, and relation to listed references • Medical information, or health insurance information (as to our employees). • Names of spouse, designated beneficiaries, emergency contacts (as to our employees) • Some personal information included in this category may overlap with other categories. 	YES

<p>C -Protected classification characteristics under California or federal law.</p>	<ul style="list-style-type: none"> • Age (40 years or older- as derived from DOB information) • Race, citizenship, sex and/or marital status (as indicated or evident from ID/passport documents) • Physical or mental disability (as indicated in Guardian or Power of Attorney documents provided; or noted in connection with ADA or regulatory compliance) • Veteran or military status 	<p>YES</p>
<p>D -Commercial information.</p>	<ul style="list-style-type: none"> • Records of personal property (vehicle information if used to secure loan) • Records of products and services purchased • Records of payment histories, receipts and balances in connection with products and services provided • Records of Adverse Action notices • Records of Risk based pricing notices • Records of credit reporting to CRAs • Records of credit scores and underwriting determinations 	<p>YES</p>
<p>E -Biometric information.</p>	<ul style="list-style-type: none"> • Copy of photo identification provided (photo with physical description- e.g. Driver's License) • Customer store photo upon initial account application at retail locations • Copy of fingerprints if on certain consumer provided documents (e.g. POA; State IDs) 	<p>YES</p>
<p>F -Internet or other electronic network activity.</p>	<ul style="list-style-type: none"> • Information on a consumer's interaction with our website or mobile device, application, or advertisement. 	<p>NO</p>
<p>G -Geolocation data.</p>	<ul style="list-style-type: none"> • Data obtained regarding consumer location at the time of interaction with our website or mobile device application 	<p>NO</p>
<p>H -Audio or Visual information.</p>	<ul style="list-style-type: none"> • Audio information is often obtained via recording phone conversations with notice in connection with handling complaints and undertaking collections, but is not stored beyond a limited period absent an active investigation, arbitration, lawsuit, law enforcement/government regulatory request or judicial/administrative order. 	<p>YES</p>
<p>I -Professional or employment-related information.</p>	<ul style="list-style-type: none"> • Current or past job history or performance evaluations (as to our employees or employee applicants). 	<p>YES</p>
<p>J -Non-public education information (per Family Educational Rights and Privacy Act and regulations).</p>	<ul style="list-style-type: none"> • 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. 	<p>NO</p>

K -Inferences drawn from other personal information.	<ul style="list-style-type: none"> Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. 	NO
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Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - 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), and the Driver's Privacy Protection Act of 1994.

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

- Directly from customers and applicants for our products or services, employment applicants, and employees or their agents. For example, from application documents that consumers provide us in connection with seeking loans, or information persons provide in connection with their employment or seeking employment with us.
- Indirectly from customers and applicants for our products, employment applicants, and employees or their agents. For example, through information you have supplied by seeking employment through employment agencies.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal.
- From service providers and third-parties that interact with us in connection with the products we provide or services we perform. For example, from government database sources when we review a loan applicant's military status as required for compliance with the federal Military Lending Act; or information obtained from credit reporting agencies.

Use of Personal Information

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

- To provide you with information, products or services that you request from us.
Business Purpose(s): See Categories- A, B, C, D, and E
- To conduct underwriting analysis and determine creditworthiness.
Business Purpose(s): See Categories- A, B, C, and D
- To provide you with information about products, services or offers that may be of interest to you.
Business Purpose(s): See Categories- A, and D
- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order to seek employment with us, we will use

that information to review your qualifications and as otherwise needed to complete the hiring process or decline the employment application.

Business Purpose(s): See Categories- A, B, C, D, and E

- To provide you with telephone, text and email messages and reminders, adverse action notices and other notices concerning our products or services, that you have requested, obtained or that may be of interest to you.
Business Purpose(s): See Categories- A, and D
- To carry out our obligations and enforce our rights arising from any agreements entered into between you and us, including for billing and collections.
Business Purpose(s): See Categories- A, B, C, D, E, H, and I
- To carry out our obligations and enforce our rights arising from any agreements we have acquired from others, or under which we have servicing obligations involving transaction in which you have entered, including for billing and collections.
Business Purpose(s): See Categories- A, B, C, D, E, H, and I
- For testing, research, analysis and product development.
Business Purpose(s): See Categories- B, D, and H
- As necessary or appropriate to prevent fraud upon you or us and protect the rights, property or safety of us, our customers or others.
Business Purpose(s): See Categories- A, B, C, D, E, and H
- To respond to state or federal regulators, law enforcement requests and as required by applicable law, court order, administrative ruling, consent agreement, settlement or governmental regulations.
Business Purpose(s): See Categories- A, B, C, D, E, H, and I
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
Business Purpose(s): See Categories- A, B, C, D, E, H, and I
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
Business Purpose(s): See Categories- A, B, C, D, E, H, and I

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. 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 or any purpose except performing the contract.

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

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Professional or employment-related information.

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

- Our affiliates to the extent permitted by state law.
- Service providers.
- Third parties as needed to process, complete or maintain record of your transactions; or to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. These include:
 - Data Analytics providers
 - Government entities
 - Operating systems
 - Credit Reporting Agencies
 - Banks and other financial institution

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

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights you may have and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- 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 that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. For deletion requests made online, a separate second confirmation of the deletion request shall be required. In responding

to a request to delete please note that we will maintain a record of the request pursuant to Cal. Civil Code section 1798.105(d).

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

1. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 877-353-1328
- Visiting www.pathcredit.com and completing the form found at <https://pathcredit.com/ccpa-request-form/>
- Visiting your portal at portal.pathcredit.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. Note that we do not collect or sell personal information on persons of 16 years of age or less.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

In order to verify your request, you must provide, *inter alia*, the following information:

- Name, current mailing address, current email address
- Date of Birth (if not a current or former customer)
- A current telephone number

- If acting as an agent, a signed attestation by the consumer of authorization
- Other information as directed if we are unable to match and confirm verification

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to an additional 45 days, hence 90 days total), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Right to Opt-Out of Sale of Personal Information

We do not presently engage in the sale of consumer personal information. Under state law you have the right to opt-out of the sale of your personal information. To exercise that right, you may do so by:

- Calling us at 877-353-1328
- Visiting www.pathcredit.com and completing the form found at <https://pathcredit.com/ccpa-request-form/>
- Visiting your portal at portal.pathcredit.com

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

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 your portal with its effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, wish to exercise your rights under California law, or seek to obtain or access this notice in an alternative format due to a disability, please do not hesitate to contact us at:

Phone: 877-353-1328

Websites: <https://www.pathcredit.com> or <portal.pathcredit.com>

Postal Address: Path Credit Account Servicing

P.O. Box 105

Dublin, OH 43017

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