

California Consumer Privacy Act Privacy Policy

Effective Date: January 1, 2020

Last Updated Date: January 1, 2023

Introduction

Northpointe Bank (“Northpointe,” “we,” “our,” or “us”) respects the privacy of your information. This California Consumer Privacy Act (“CCPA”) Privacy Policy is designed to assist California residents in understanding how we collect, use, disclose, share, and retain their personal information both online and offline.

Any terms defined in the CCPA have the same meaning when used in this CCPA Privacy Policy.

Scope and Application of this CCPA Privacy Policy

This CCPA Privacy Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this CCPA Privacy Policy does not apply to you and you should not rely on it.

If you have a consumer financial product or service with us, we will use and share any information that we collect from or about you in accordance with our [U.S. Consumer Privacy Notice \(https://www.northpointe.com/npb-giba-privacy-policy/\)](https://www.northpointe.com/npb-giba-privacy-policy/), which offers you certain choices with respect to the use and sharing of your personal information.

If you are California resident and a current or former employee, job applicant, or independent contractor of ours, please see our privacy notice available [here \(https://www.northpointe.com/california-privacy-rights/\)](https://www.northpointe.com/california-privacy-rights/) for more information on our collection and use of your personal information in that capacity.

Notice at Collection of Personal Information

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

We currently collect and, in the 12 months prior to the Last Updated Date of this CCPA Privacy Policy, have collected the following categories of Personal Information:

- Identifiers (name, alias, postal address, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, and passport number)
- Unique personal identifiers (device identifier, cookies, beacons, pixel tags)
- Other type of state identification card number
- Telephone number

- Signature
- Physical characteristics
- Bank account number
- Credit and debit card number
- Insurance policy number
- Other financial information
- Internet or other electronic network activity information (browsing history; search history; and information regarding consumer's interaction with website, application or advertisement)
- Geolocation data
- Commercial information (records of products or services purchased, obtained, or considered)
- Education information
- Professional or employment-related information (including employment history)
- Characteristics of protected classifications under California or federal law (race, color, sex/gender, gender identity/expression, age (40 and older), national origin, ancestry, citizenship status, marital status, and military or veteran status)
- Ethnic origin
- Audio information

We collect Personal Information directly from California residents, third party lead providers, government entities, consumer data resellers, data analytics providers, and operating systems and platforms. We do not collect all categories of Personal Information from each source.

We currently collect and have collected the above categories of Personal Information for the following business or commercial purposes:

- Auditing related to counting ad impressions to unique visitors
- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, or providing similar services
- 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, manufactured for, or controlled by us

Disclosure of Personal Information

In the past twelve (12) months, we have not sold Personal Information. We do not sell and will not sell the Personal Information of a minor under 16 years of age without affirmative authorization. We do not collect or use sensitive personal information to infer characteristics about individuals or use Sensitive Personal Information for purposes other than those the CCPA and its regulations allow for.

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed Personal Information.

Category of Personal Information	Categories of Recipients
Name and email address	Business partner, operating system and platform, service provider, affiliate, external marketing entity
Alias, unique personal identifier, Social Security number, passport number	Business partner, operating system and platform, service provider, affiliate
Postal address	Business partner, operating system and platform, service provider, external marketing entity
Telephone number, signature, driver's license number and other type of state identification, education, employment history and professional or employment-related information, bank account number, credit card number, veteran and military status, geolocation data, cookies, beacons, pixels	Business partner, operating system and platform, service provider
Account name and physical characteristics	Business partner, operating system and platform, service provider, affiliate, government entity
Internet Protocol address, debit card number	Business partner, operating system and platform, service provider, government entity, data analytics provider

Other financial information	Business partner, operating system and platform, service provider and government entity
Insurance policy number	Business partner, consumer data resellers, operating system and platform, service provider, affiliate
Age (40 years or older); marital status	Business partner
Ancestry, race, color, citizenship, sex/gender, gender identity, gender expression, national origin	Business partner, service provider, government entity, data analytics provider

We disclosed Personal Information for the business and commercial purposes discussed above.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Rights Under the CCPA

If you are a California resident, you have the following rights with respect to your Personal Information:

- (1) The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose for collecting, selling or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;
- (2) The right to delete Personal Information that we collected from you, subject to certain exceptions;
- (3) The right to correct inaccurate Personal Information that we maintain about you;
- (4) If we sell or share Personal Information, the right to opt out of the sale or sharing;
- (5) If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and

- (6) The right not to receive discriminatory treatment by us for the exercise of privacy rights the CCPA confers.

Verification Process

In order to process a Request to Know, Delete, or Correct, we must verify your identity and confirm that you are the consumer about whom we have collected information or an authorized representative of such person. Our verification process requires us, or a third-party verification service, to attempt to match 2-3 pieces of identifying information provided by you with information we have already.

We endeavor to respond to a verified consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If there is no reasonable method by which your identity may be verified to the degree of certainty required, we will tell you in our written response and explain why. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA.

How to Exercise Your Rights

You may submit a Request to Know, Delete or Correct by either:

- Calling us at 866-426-4127
- Visiting <https://www.northpointe.com/california-privacy-rights/california-privacy-request-form/>

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, and if the request is not subject to an exemption or exception, we will require additional information to verify your authority to act on behalf of the California resident.

Accessibility

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below. Please also see our Accessibility Statement [here](https://www.northpointe.com/accessibility/) (<https://www.northpointe.com/accessibility/>).

Contact For More Information

If you have questions about this CCPA Privacy Policy or our practices with respect to Personal Information, please email us at support@northpointe.com, or call 866-426-4127. You may also write to us at:

Northpointe Bank Attn: Customer Service 5303 28th Street Ct SE, Grand Rapids, Michigan 49546