

California Consumer Privacy Act Privacy Policy

Last Updated Date: January 1, 2020

This privacy policy of **Northpointe Bank** (“we”, “our”) applies solely to visitors, users, and others who are California residents (“you”). We adopt this privacy policy in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) and its implementing regulations (collectively, “CCPA Privacy Policy”).

The purpose of this CCPA Privacy Policy is to provide you with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of Personal Information and your rights regarding your Personal Information. Any terms defined in the CCPA have the same meaning when used in this CCPA Privacy Policy.

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 or device (“Personal Information”).

The below table presents the categories of Personal Information that we have collected, the categories of sources from which that information was collected, and the categories of third parties with whom we shared that Personal Information for the 12 months preceding the “Last Updated” date of this CCPA Privacy Policy.

The CCPA defines “business purposes” to mean:

- (1) Auditing related to a current interaction with the consumer and concurrent transaction, including, but not limited to, counting ad impressions to unique visitors,
- (2) Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity,
- (3) Debugging to identify and repair errors that impair existing intended functionality,
- (4) Short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction,
- (5) Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services,
- (6) Undertaking internal research for technological development and demonstration, and
- (7) 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.

For purposes of the below chart, we will refer to the business purposes by their above numbers.

| Collection of Personal Information Within Last 12 Months | | | |
|--|---|---|--|
| Categories of Personal Information Collected | Categories of Sources from which Personal | Business or Commercial Purpose for the Collection | Categories of Third Parties with whom We |

| | Information was Collected | | Share Personal Information |
|--|--|--------------------------------|---|
| Name and email address | <ul style="list-style-type: none"> • Consumer • Third Party Lead Provider | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Affiliate • External Marketing Entity |
| Alias | <ul style="list-style-type: none"> • Consumer • Government Entities | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Affiliate |
| Postal Address | <ul style="list-style-type: none"> • Consumer | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • External Marketing Entity |
| Telephone Number | <ul style="list-style-type: none"> • Consumer • Third Party Lead Provider • Government Entities | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Account Name and Physical Characteristics | <ul style="list-style-type: none"> • Consumer • Third Party Lead Provider | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Affiliate • Government Entity |
| Signature | <ul style="list-style-type: none"> • Consumer | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Unique Personal Identifier | <ul style="list-style-type: none"> • Consumer | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Affiliate |
| Internet Protocol Address | <ul style="list-style-type: none"> • Consumer • Government Entities | (2) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Government Entities • Data Analytics Provider |
| Social Security Number | <ul style="list-style-type: none"> • Consumer • Government Entities | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Affiliate |

| | | | |
|--|--|-----------|---|
| | | | <ul style="list-style-type: none"> • Data Analytics Provider • Government Entity |
| Driver's License Number and Other Types of State Identification | <ul style="list-style-type: none"> • Consumer | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Other Financial Information | <ul style="list-style-type: none"> • Consumer | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Government Entity |
| Passport Number | <ul style="list-style-type: none"> • Consumer | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Affiliate |
| Insurance Policy Number | <ul style="list-style-type: none"> • Consumer | (5) | <ul style="list-style-type: none"> • Business Partner • Consumer Data Resellers • Operating System and Platform • Service Provider • Affiliate |
| Education | <ul style="list-style-type: none"> • Consumer | (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Employment History and Professional or Employment Related Information | <ul style="list-style-type: none"> • Consumer | (1) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Bank Account Number | <ul style="list-style-type: none"> • Consumer • Consumer Data Reseller | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Credit Card Number | <ul style="list-style-type: none"> • Consumer | (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Debit Card Number | <ul style="list-style-type: none"> • Consumer • Government Entities | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider • Government Entity • Data Analytics Provider |
| Other Financial Information | <ul style="list-style-type: none"> • Consumer | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform |

| | | | |
|---|---|--------------------------------|--|
| | | | <ul style="list-style-type: none"> • Service Provider |
| Age (40 years or older) | <ul style="list-style-type: none"> • Consumer | (5) | <ul style="list-style-type: none"> • Business Partner |
| Ancestry | <ul style="list-style-type: none"> • Consumer | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Service Provider • Government Entity • Data Analytics Provider |
| Race, color, citizenship, sex/gender, gender identity, gender expression | <ul style="list-style-type: none"> • Consumer | (5) | <ul style="list-style-type: none"> • Business Partner • Service Provider • Government Entity • Data Analytics Provider |
| National Origin | <ul style="list-style-type: none"> • Consumer | (1), (2), (3), (5), (6), & (7) | <ul style="list-style-type: none"> • Business Partner • Service Provider • Government Entity • Data Analytics Provider |
| Marital Status | <ul style="list-style-type: none"> • Consumer | (5) | <ul style="list-style-type: none"> • Business Partner |
| Veteran Military Status | <ul style="list-style-type: none"> • Consumer • Third Party Lead Provider | (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |
| Geolocation Data and Cookies, Beacons, Pixels | <ul style="list-style-type: none"> • Consumer | (2) & (5) | <ul style="list-style-type: none"> • Business Partner • Operating System and Platform • Service Provider |

Disclosure of Sale Of Collected Personal Information

In the past twelve (12) months, we have not sold any Personal Information. We do not sell and will not sell the Personal Information of a minor under 16 years of age without affirmative authorization.

The following is a list of categories of Personal Information that we have disclosed for a business purpose in the 12 months preceding the Last Updated Date of this Privacy Policy:

| | | |
|--------------------------|---------------------------|-----------------------------|
| Name | Alias | Account Name |
| Email Address | Signature | Telephone Number |
| Postal Address | Social Security Number | Unique Personal Identifier |
| Physical Characteristics | Internet Protocol Address | Driver's License Number |
| Other Types of State ID | Passport Number | Insurance Policy Number |
| Education Information | Employment History | Bank Account Number |
| Credit Card Number | Debit Account Number | Other Financial Information |
| Age (40 and older) | Ancestry | Marital Status |
| Cookies, Beacons, Pixels | Geolocation Data | Unique Personal Identifier |

Citizenship Status
Military / Veteran Status
Sexual Orientation

Color
National Origin
Professional or Employment Related Information

Gender Identity / Expression
Race

Notice of Right to Opt-Out of Sale of Personal Information

The CCPA gives consumers the right to direct a business that sells (or may in the future sell) Personal Information to stop selling Personal Information, and to refrain from doing so in the future.

We have not and will not sell your Personal Information and therefore, you do not have a Right to Opt-Out.

Rights Under the CCPA

You have the right to request, twice within a 12-month period, that we disclose what Personal Information we have collected, used, disclosed or sold (“Request to Know”). A Request to Know includes a request for any or all of the following:

- Specific pieces of Personal Information that we have about you.
- The categories of Personal Information we collected about you.
- The categories of sources from which we collected the Personal Information about you.
- The categories of Personal Information that we sold or disclosed for a business purpose about you.
- The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- Our business or commercial purpose for collecting or selling Personal Information.

You have the right to request the deletion of your Personal Information that we collected or retained (“Request to Delete”).

You have the right not to receive discriminatory treatment by us for exercising any of your CCPA privacy rights including the right to not be:

- Denied goods or services.
- Charged different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provided a different level or quality of goods or services.
- Suggested that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Requests to Know and Requests to Delete will be acknowledged within 10 days of receipt.

Verification Process

In order to process a Request to Know or a Request to Delete, 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. You will be required to re-authenticate yourself prior to us disclosing or deleting your Personal Information.

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's Right to Know or Right to Delete.

How to Exercise Your Rights

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

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

Only you, or a person or business entity registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer Request to Know or Request to Delete related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

Authorized Agent

An authorized agent is a natural person or a business entity registered with the California Secretary of State that you authorize to act on your behalf.

You may designate an authorized agent to make a Request to Know or a Request to Delete on your behalf if we are able to verify your identity and we receive proof that you gave written permission or a power of attorney to the authorized agent.

You may designate an authorized agent to Request to Opt-Out of the sale of your Personal Information to a third party if, the right is afforded to you, and we receive proof that they have been authorized by you to act on your behalf.

Personal Information Of Minors

We may collect or maintain the Personal Information of children 16 years of age or younger. However, such information is collected in person or over the phone and not online. We do not sell the Personal Information of children 16 years of age or younger.

Contact For More Information

If you have questions about this Privacy Statement 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
3333 Deposit Drive
Grand Rapids, Michigan 49546