

CCPA PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last Updated November 9, 2023

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This California Consumer Privacy Act (CCPA) Notice (“CCPA Privacy Notice”) is provided by First Citizens BancShares, Inc., and its subsidiaries and affiliates, including First-Citizens Bank & Trust Company; CIT Bank, a division of First-Citizens Bank & Trust Company, and other CIT-branded businesses of First-Citizens Bank & Trust Company; and Silicon Valley Bank, a division of First-Citizens Bank & Trust Company, and other Silicon Valley Bank-branded businesses of First-Citizens Bank & Trust Company (collectively “Company,” “we,” “us,” or “our”) pursuant to the CCPA and supplements the information contained in Company’s [Privacy Statement](#).

This CCPA Privacy Notice applies solely to information about California residents (“Consumers” or “you”) and to “Personal Information” as defined in the CCPA. The CCPA requires us to make certain additional disclosures and provides California Consumers with the ability to request additional information about their Personal Information. This section explains these rights and describes how California Consumers may submit a request to exercise those rights.

Please note that the rights under the CCPA do not apply to Personal Information collected, processed, sold or disclosed pursuant to:

- Gramm-Leach-Bliley Act (Public Law 106-102), the federal privacy regulation. Generally, this will apply to any Personal Information obtained in connection with our financial products or services that are used primarily for personal, family or household purposes;
- Fair Credit Reporting Act (12 CFR 1022). Generally, this will apply to Personal Information related to credit history or credit worthiness; or
- Health Insurance Portability and Accountability Act (Public Law 104-191). Generally, this will apply to health or medical information.

Personal Information We Collect and Disclose

The table below shows each category of Personal Information we may have collected and disclosed for our business purposes (further described below) and the categories of potential other parties to whom the Personal Information was disclosed within the last twelve (12) months, depending on your relationship with us, and as permitted or required by law:

Category of Personal Information Collected	Examples	Categories of Other Parties to Whom We Disclose Personal Information
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Certain sensitive types of Personal Information	Social Security number, driver's license or state identification card number, passport number, bank account number, credit card number, debit card number, or any other financial information, credentials allowing access to an account, age, race, color, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), precise geolocation.	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, voiceprints or keystrokes.	<p>Service Providers.</p> <p>Government agencies as required by laws and regulations.</p>
Commercial information	Records of personal property, products or services purchased.	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p>

Category of Personal Information Collected	Examples	Categories of Other Parties to Whom We Disclose Personal Information
		<p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information, such as phone call and video recordings; ATM and in-branch video monitoring.	<p>Service Providers.</p> <p>Government agencies as required by laws and regulations.</p>
Internet or other electronic network activity information	Browsing history, search history, IP address, geolocation data (with your consent) and information regarding your interaction with our Sites, collectively “Online Information” .	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Professional or employment-related information	Current or past job history or performance evaluations, employer name, or languages.	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p>

Category of Personal Information Collected	Examples	Categories of Other Parties to Whom We Disclose Personal Information
		Government agencies as required by laws and regulations.
Education information	Education information including records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, and class lists.	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Inferences drawn from Personal Information to create a Consumer profile	Profile that may reflect Consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Characteristics of protected classifications under California or federal law	Characteristics such as age, sex or gender, race, religion/creed, color, national origin, citizenship, disability, immigration status, military/veteran status, medical conditions, marital status, and request for leave	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p>

Category of Personal Information Collected	Examples	Categories of Other Parties to Whom We Disclose Personal Information
		<p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>
Geolocation data	Device location	<p>Service Providers.</p> <p>Affiliates, in accordance with applicable law.</p> <p>Other Third Parties, in connection with products or services we provide, in accordance with applicable law.</p> <p>Government agencies as required by laws and regulations.</p>

Sources of Personal Information

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you, such as when you apply for or obtain one of our products or services, or if you apply for a job with us;
- Indirectly from you, such as from observing your actions on our websites or mobile applications that link to our Privacy Statement and this Notice (each, a “**Site**”, and collectively, “**Sites**”);
- From financial and non-financial companies related by common ownership or control (our “**Affiliates**”), based on your relationship with them and as permitted by law; and/or
- From other companies or organizations that we work with, based on your relationship with them and as permitted by law, such as credit bureaus.

- From other third parties, such as current or prior employers, references, recruiters, or job-related social media platforms, if you apply for a job with us.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- To deliver products, information, or services, including to:
 - complete transactions;
 - provide account services;
 - recognize and remember you when you visit our Sites;
 - improve our Sites and make them easier to use, and provide you with an overall improved experience on our Sites;
 - notify you about updates to your accounts, products, and/or services;
 - perform quality assurance activities that maintain the quality of services provided to you; or
 - respond to your inquiries.
- To provide advertising about our products and services, including:
 - sending marketing materials inclusive of special offers, email notifications, or other notices regarding our products, services, or news; or
 - presenting personalized content or tailored ads that may relate to your interests and/or location.
- To manage security risks and prevent fraudulent activity, including to:
 - detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activities;
 - debug to identify and repair errors that may impair existing intended functionality;
 - maintain a secure session, authenticate your computer and verify transactions;
 - verify your identity such as when you apply for an account or access our online/mobile services; or
 - assess your creditworthiness, including obtaining credit reports if you apply for credit or apply for a financial product or service.
- To conduct employment-related activities, including to:
 - perform background checks;
 - deliver employee benefits programs;
 - contact references you provide during your application process;
 - conduct research, analytics, and data analysis to assist in planning succession and to ensure business continuity.
- To perform other activities, as permitted or required by law, including:
 - to perform internal research;

- in connection with litigation;
- in connection with a sale or merger;
- to comply with regulatory record retention requirements;
- to perform analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view;
or
- for audit purposes within our organization.

Retention of Personal Information

We retain Personal Information for as long as necessary to fulfill the purpose(s) for which they were obtained, unless a longer retention period is required by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you;
- Whether there is a legal obligation (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable based on our legal position, such as applicable statutes of limitations, litigations, or regulatory investigations.

Special Considerations for Minors

Our Sites are not intended for children under 16 years of age and we do not knowingly market our products or services to children.

We do not knowingly collect or retain Personal Information from individuals under the age of 13. Visit the [Federal Trade Commission website](#) for more information about the Children's Online Privacy Protection Act (COPPA).

Your rights under the CCPA

The CCPA grants California Consumers various rights around the Personal Information that is collected about them. The rights are explained in further detail below:

A. Right to Know About Personal Information Collected and/or Disclosed

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your Personal Information. Upon our receipt of a verifiable request from you, we will, as applicable, disclose the following information:

1. The categories of Personal Information we have collected about you.
2. The categories of sources from which the Personal Information was collected.

3. The business or commercial purpose for collecting your Personal Information.
4. The categories of other parties with whom we share your Personal Information.
5. The specific pieces of Personal Information we have collected about you.

B. Right to Request Correction of Inaccurate Personal Information

You have the right to request that we correct any inaccuracies of your Personal Information we maintain about you. Once we receive and confirm your verifiable Consumer request, we will correct (and direct our Services Providers and/or Third Parties to correct) the Personal Information we maintain about you.

C. Right to Request Deletion of Personal Information

You have the right to request that we delete the Personal Information that we have collected and retained about you. Once we receive and confirm your verifiable Consumer request, we will delete (and direct our Service Providers and/or Third Parties to delete) your Personal Information from our records, unless an exception applies.

For example, we may deny your deletion request if retaining the information is necessary for us, our Service Providers, and/or our Third Parties 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 et. 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.

D. Right to Opt-Out of the Sale or Sharing of Personal Information

The CCPA defines “sell” as the disclosure of Personal Information to a Third Party for monetary or other valuable consideration. The CCPA defines “share” as the disclosure of Personal Information to a Third Party for cross-context behavioral advertising.

We do not sell Personal Information and will not sell Personal Information without providing you with prior notice and an opportunity to opt-out, as required by law.

We do share some Online Information, some of which may be considered Personal Information, with Third Parties for the purposes of delivering tailored advertising to you across the internet, and to help manage and optimize our internet-business and communications. To opt-out of this type of sharing:

- Consumers of First Citizens and CIT: You may click the Your Privacy Choices link in the footer of this page and turn off Marketing Cookies.
- Consumers of Silicon Valley Bank: You may go to svb.com/cookie-notice and click on “Manage Consent” to turn off Cookies.

If available on your web browser, you may set your browser or device to send an opt-out preference signal, such as through the Global Privacy Control, to signal a request to opt-out of the sharing of your Personal Information. We honor these requests to the extent we are able to, based on the information provided via the signal. Note that we may not be able to tie a browser or device-based preference signal request to all Personal Information we have about you. Please visit globalprivacycontrol.org for more information.

You may still see advertisements while you are browsing online; however, the advertisements you see may be less relevant to you and your interests. Please note these opt-outs work via Cookies, so if you delete Cookies, use a different device, or change web browsers, you will need to opt-out again.

E. Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising any of your rights. This includes:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing other similar penalties;
- Providing a different level of service or quality of goods or services;
- Suggesting a different level of service or quality of goods or services; or
- Retaliating against an employee, applicant or independent contractor.

How to Submit a Request

To submit access or deletion requests:

First Citizens Bank Consumers:

Completing the [Online Request Form](#).

Calling us at 1-866-206-2711, Monday through Friday from 8 am to 4 pm PT.

CIT Bank Consumers:
<https://dataprivacyrights.cit.com> or 1-866-206-2711

Silicon Valley Bank Consumers:
<https://www.svb.com/privacy/dsr> or 1.800.774.7390

Employees, contractors or applicants of the Company can complete and submit a Personnel File Review Request Form in the HR Portal or send an email to: HRCompliance@firstcitizens.com with your request.

To submit correction requests:

First Citizens Bank Consumers or CIT Bank Consumers:

- Email privacyquestions@firstcitizens.com
- Call us at 1-866-206-2711, Monday through Friday from 8 am to 4 pm PT.

Silicon Valley Bank Consumers:

- <https://www.svb.com/privacy/dsr> or 1.800.774.7390

Employees, contractors or applicants of the Company can complete and submit a Personnel File Review Request Form in the HR Portal or send an email to: HRCompliance@firstcitizens.com with your request.

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. If you request access to, correction to, or deletion of your Personal Information, we may require you to provide any of the following information: name, date of birth, social security number, email address, telephone number or postal address.

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.

Submitting a Request through Your Authorized Agent

Only you, or someone legally authorized to act on your behalf, may make a verifiable Consumer request to know, correct, or delete your Personal Information. To do this, you must do the following (unless you have provided the authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130):

- Select "authorized agent" in the Online Request Form
- Provide proof of authorization on an [authorization form](#) signed by the Consumer who is the subject of the request.

- Directly confirm with us that you provided the authorized agent permission to submit the request.
- Submit the form to us in the manner set forth in “How to Submit a Request”

Response

We will respond to requests within 45 days and will notify the requester if we need additional time.

You may only make a verifiable Consumer request 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.

Response Format

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 we reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request.

Changes to this CCPA Privacy Notice

We reserve the right to amend this CCPA Privacy Notice at our discretion and at any time. When we make changes, we will post the updated notice on the applicable Site and update the notice's date. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

How to Contact Us

If you have any questions or concerns about this CCPA Privacy Notice or about how the Company collects, uses, shares, or discloses Personal Information, please contact:

First Citizens Bank Consumers:

Telephone: 888-FC DIRECT (888-323-4732)

Email: PrivacyQuestions@firstcitizens.com

CIT Bank Consumers:

Telephone: 1-866-206-2711

Email: Privacy.Questions@cit.com

Silicon Valley Bank Consumers:

Telephone: 1-800-774-7390

Email: PrivacyOffice@svb.com