

CALIFORNIA PRIVACY RIGHTS ACT NOTICE

This Privacy Notice explains what types of Personal Information may be collected, used and disclosed by SVB Financial Group (“SVB”) about our California residents and how that information may be used and disclosed. This Privacy Notice also applies to California residents who are designated by our employees as emergency contacts or benefits recipients. Under the California Privacy Rights Act (CPRA), “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household.

1. Categories of Personal Information Collected. We collect the following categories of Personal Information:

- A. Identifiers, such as name, postal address, email address, government-issued identifier (e.g., Social Security number), and unique identifiers (e.g., employee ID);
- B. Personal information, as defined in the California Records Law, such as name, signature, contact and financial information, government-issued identification numbers (e.g., Social Security number), education and employment history, physical characteristics or description, and other financial information, and medical information or health insurance policy number or information (e.g., for benefits administration);
- C. Characteristics of protected classifications under California or federal law, such as age, sex, race, color, national origin, citizenship, disability, immigration status, military/veteran status, medical conditions, marital status, and request for leave;
- D. Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements);
- E. Biometric information, such as fingerprints (e.g., in connection with timekeeping systems that use such measures);
- F. Internet or network activity information, such as browsing history and interactions with our online systems and websites;
- G. Geolocation data, such as device location;
- H. Audio, electronic, visual, and similar information, such as call and video recordings;
- I. Professional or employment-related information, such as work history and prior employer;
- J. Non-public education information;
- K. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics; and
- L. Sensitive Personal Information, such as (i) information that reveals Social Security number, driver’s license number or other government-issued identification number, account log-in to company accounts, geolocation, racial or ethnic origin, union membership, and contents of emails and messages sent or received on company systems, (ii) biometric information (e.g., fingerprints as described above), and (iii) health information (e.g., for worker’s compensation and disability claims).

Depending on the particular California resident’s interactions with us, we may not collect each of these categories of Personal Information about that person.

2. Sources of Personal Information. We collect Personal Information directly from California residents themselves, consumers, as well as from current or prior employers, references, recruiters, job-related social media platforms, and third-party sources.

Depending on the particular California resident's interactions with us, we may not collect Personal Information from each of these categories of sources.

3. Uses of Personal Information. We use Personal Information to:

- Manage workforce activities and personnel generally, including for recruitment, performance management, career development, payments administration, employee training, leaves and promotions;
- Manage wages and other compensation, and provide healthcare, pensions, savings plans and other benefits;
- Conduct research, analytics, and data analysis to assist in planning succession and to ensure business continuity, as well as to design employee retention programs and diversity initiatives;
- Operate and manage IT and communications systems and facilities, allocate company assets and human resources, and undertake strategic planning and project management;
- Providing our products and services or fulfilling your requests, and
- Comply with law, legal process, internal policies and other requirements such as income tax deductions, record-keeping and reporting obligations, and exercise and defend legal claims.

Depending on the particular California resident's interactions with us, we may not use Personal Information about that person for each of these purposes.

4. Disclosures of Personal Information. We disclose the following categories of Personal Information to third parties, such as our affiliates, as well as to our service providers and government agencies such as tax authorities, for our operational business purposes:

- A. Identifiers;
- B. Personal information, as defined in the California Records Law;
- C. Characteristics of protected classifications under California or federal law;
- D. Commercial information;
- E. Biometric information;
- F. Internet or network activity information;
- G. Geolocation data;
- H. Audio, electronic, visual, and similar information;
- I. Professional or employment-related information;
- J. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics; And
- K. Sensitive Personal Information.

Depending on the particular California resident's interactions with us, we may not disclose each of these categories of Personal Information about that person for these purposes.

5. Sale and Sharing of Personal Information. We do not sell your Personal Information, and we do not share or otherwise process Personal Information for purposes of cross-context behavioral advertising, as defined under the CPRA. We have not engaged in such activities in the 12 months preceding the date this Privacy Policy was last updated.

6. Retention Period. We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you (for example, for as long as you are employed by us) and the length of time thereafter during which we may have a legitimate need to reference your Personal Information to address issues that may arise;
- Whether there is a legal obligation to which we are subject (for example, certain laws and regulations require us to keep employment and payroll records for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

7. Individual Rights and Requests. If you are a California resident, you may make the following requests:

1. You may request that we disclose to you the following information covering the 12 months preceding your request:
 - a. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - b. The business or commercial purpose for collecting Personal Information about you; and
 - c. The categories of Personal Information about you that we disclosed and the categories of third parties to whom we disclosed such Personal Information.
2. You may request to correct inaccuracies in your Personal Information.
3. You may request to have your Personal Information deleted.
4. You may request to receive the specific pieces of your Personal Information, including a copy of the Personal Information you provided to us in a portable format.

You have the right to be free from unlawful discrimination for exercising your rights under the CPRA. To make a privacy request, please contact us at <https://www.svb.com/privacy/dsr> or 1.800.774.7390.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as mailing address, telephone number and/or email address, in order to verify your identity and protect against fraudulent requests. If you make a deletion request, we may ask you to verify your request before we delete your Personal Information.

Authorized Agents. If an agent would like to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted above. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described above or confirm that you provided the agent permission to submit the request.

8. Contact Us

Please contact PrivacyOffice@SVB.com if you have any questions regarding this CPRA Notice, or call 1-800-774-7390.