

Metropolitan Commercial Bank California Consumer Privacy Act Privacy Policy and Notice

The California Consumer Privacy Act (“CCPA”) applies to “California Residents” only and provides them with control over the Personal Information that businesses collect about them, including the right to know what information is collected on them and how it is used and shared, subject to exceptions; the right to delete such personal information, subject to exceptions; the right to opt-out of the sale of their personal information, if applicable; and the right to non-discrimination for exercising their rights under the CCPA.

This CCPA Privacy Notice outlines how Metropolitan Commercial Bank (“MCB”, “we”, “us”, “our”) collects, uses, and shares Personal Information in compliance with the CCPA and supplements MCB’s Privacy Policy only for California Residents. “You” and “your” refer to California Residents.

DEFINITIONS

California Resident is defined under the CCPA as a natural person who resides in California, even if the person is temporarily outside of the state, and does not include a corporation or other business entity.

Personal Information is defined under the CCPA as information that identifies, relates to, or could reasonably be linked with you or your household. The CCPA provides exclusions for certain Personal Information, such as Personal Information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act or the federal Fair Credit Reporting Act.

COLLECTION OF PERSONAL INFORMATION

The categories of personal information MCB may have collected about you in the preceding 12 months is as follows:

- Identifiers such as a real name, alias, postal address, internet protocol address, online identifier, email address, social security number, driver’s license number, passport number, or other similar identifiers.
- Personal information, as defined under the California customer records law, such as bank account number, debit card number, or any other financial information.
- Characteristics of protected classifications under California or federal law, such as race, color, religion, national origin, gender, marital status or age.
- Commercial information, such as records of personal property or products or services purchased, obtained, or considered.
- Biometric information.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with our internet website.
- Geolocation data, such as internet protocol location.
- Audio, electronic, visual, or similar information.
- Professional or employment-related information, such as employment history.
- Education information, such as schools attended and dates of attendance.
- Inferences drawn from any of the information identified above to create a profile about you, such as your preferences and characteristics.

We may have collected the Personal Information listed above from the following categories of third party sources:

- Directly from you or your representative.
- Government entities where public records are obtained.
- Consumer data resellers, such as consumer credit reporting agencies and data verification services.

PURPOSES FOR COLLECTING PERSONAL INFORMATION

Depending on our relationship with you, MCB's business purpose for collecting Personal Information may include:

- Performing services for you, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying your information, processing payments, or providing financing.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Complying with laws, regulations and internal policies, including for purposes of auditing, accounting, internal investigations, and legal processes.

DISCLOSURE/SHARING OF PERSONAL INFORMATION

The following is a list of categories of personal information MCB may have shared with third parties for our business purposes in the preceding 12 months:

- Identifiers such as a real name, postal address, social security number, driver's license number, passport number, or other similar identifiers.
- Personal information, as defined under the California safeguards law records, such as bank account number, debit card number, or any other financial information.
- Characteristics of protected classifications under California or federal law, such as color or gender.
- Commercial information, such as records of personal property or products or services purchased, obtained, or considered.
- Biometric information.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with our internet website.
- Geolocation data, such as Internet Protocol (IP) location.
- Audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information, such as employment history.
- Education information, such as schools attended and dates of attendance.
- Inferences drawn from any of the information identified above to create a profile about you, such as your preferences and characteristics.

MCB may have disclosed the Personal Information described above for our business purposes to the following categories of third parties:

- Service providers and vendors to provide products and services to you, such as account transactions and maintenance, and online and mobile banking services.
- Data verification services, such as to verify your identity.
- Government entities as required by laws and regulations.

YOUR RIGHTS TO MAKE REQUESTS

The Right to Know: If you are a California Resident, you have the right to request that we disclose to you:

- The categories of Personal Information we have collected about you.
- The categories of sources from which the Personal Information is collected.
- The business or commercial purpose for collecting the Personal Information.
- The categories of third parties with whom the business shares Personal Information.
- The specific pieces of Personal Information it has collected about you.

The Right to Delete: A California Resident also has the right to request that we delete any Personal Information that we have collected from you.

Both of these rights are subject to exceptions. For examples, we are not required to comply with a request to delete Personal Information if the Personal Information is necessary for us to complete a transaction for which the information was collected, or if we must retain the Personal Information to comply with a legal obligation. Certain Personal Information also is not subject to the CCPA.

HOW TO SUBMIT REQUESTS

California Residents may submit a Request to Know and/or a Request to Delete Personal Information described in this CCPA Privacy Policy and Notice, subject to limitations and exceptions, by:

- (1) By calling us at 800-852-7632 (toll-free);
- (2) Submitting a request on MCB's website, at <https://www.mcbankny.com/ccpa-request>; or
- (3) Sending an email to ccparequest@mcbankny.com

When we receive a Request to Know and/or Request to Delete from you we will verify your identity to confirm the Personal Information we maintain relates to you. We may request information from you, not limited to your name, address, and contact information, in order to verify your identity. We may use a two-step process for online Requests to Delete where you must first submit the Request to Delete and then second, we will separately confirm you want your Personal Information deleted. If you submit a request on behalf of another individual, we may require proof that you are authorized to submit such a request on behalf of that individual.

SALES OF PERSONAL INFORMATION

MCB has not sold Personal Information about California Residents in the preceding 12 months. To our knowledge, we never sell the Personal Information of California Residents under 16 years of age.

NON-DISCRIMINATION

You have the right to be free from discriminatory treatment for exercising your privacy rights under the CCPA.

CONTACT FOR MORE INFORMATION

For questions or concerns about MCB's privacy policies and practices, send an email to ccparequest@mcbankny.com.

Effective: January 1, 2020

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