



California Consumer Privacy Notice

Last Updated 8/5/2026.

This California Consumer Privacy Notice (“Notice”) applies solely to individuals who are California residents and supplements the information contained in our Privacy Policy. For purposes of this Notice, “personal information,” “sensitive personal information,” “sell,” “share,” “service provider,” “contractor,” and “third party” have the meanings given in the California Consumer Privacy Act, as amended (“CCPA”).

Table of Contents

1) Purpose of Notice	2
2) Categories of Personal Information We Collect	2
3) Categories of Sources of Personal Information.....	3
4) Categories of Recipients	4
5) Purposes of the Personal Information We Collect & Use	4
6) Categories of Personal Information We Sell or Share	5
7) Categories of Personal Information Disclosed to Service Providers or Contractors	6
8) Your CCPA Rights	7
9) Retention.....	8
10) Individuals Under 16 Years of Age	9
11) No Financial Incentives	9
12) No Use of Sensitive Information to Infer Characteristics	9
13) Automated Decision Making Technology (ADMT)	10
14) No Discrimination or Retaliation	11
15) Deidentified Information.....	11
16) Changes to this CCPA Notice.....	11
17) Contact Us.....	11

1) Purpose of Notice

The purpose of the Notice is to provide you with timely notice, at or before the point of collection, about the categories of personal information to be collected from you, the purposes for which the personal information is collected or used, and whether that information is sold or shared, so that you have a way to exercise meaningful control over our use of your personal information.

This Notice is directed to individuals who reside in the state of California (“California residents”, “you”, and “your”) and relates to personal information covered by the California Consumer Privacy Act, as amended (“CCPA”). Specifically, this Notice provides comprehensive information about our online and offline practices, along with details concerning how you may exercise the rights available to you under the CCPA.

THE CCPA DOES NOT APPLY TO INFORMATION COLLECTED PURSUANT TO THE GRAMM-LEACH-BLILEY ACT (“GLBA”), AND AS SUCH THIS NOTICE AND THE RIGHTS DESCRIBED DO NOT APPLY TO INFORMATION WE COLLECT WHEN YOU APPLY FOR OR OBTAIN OUR FINANCIAL PRODUCTS AND SERVICES FOR PERSONAL, FAMILY, OR HOUSEHOLD PURPOSES, WHICH IS SUBJECT TO OUR U.S. CONSUMER PRIVACY NOTICE.

The CCPA also does not apply to other categories of information, including the following: (i) publicly available information; (ii) deidentified or aggregated consumer information; (iii) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and (iv) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Driver’s Privacy Protection Act of 1994, or the California Financial Information Privacy Act.

2) Categories of Personal Information We Collect

In the twelve (12) months before the “Last Reviewed” date of this Notice, we have collected the following categories of personal information.

- **Personal Identifiers.** Personal identifiers such as real name or alias, address, online identifier, IP address, email address, account name, SSN, driver’s license number, passport number, or other similar identifiers
- **Personal Information Categories from Cal. Civ. Code § 1798.80(e).** Personal information categories from Cal. Civ. Code § 1798.80(e) such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
- **Characteristics of protected classifications under California or federal law.** Characteristics of protected classifications under California or federal law such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, sex, and veteran or military status
- **Commercial Information.** Commercial information such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies

- **Biometric Information.** Biometric information such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information
- **Internet or Other Electronic Network Activity Information.** Internet or other electronic network activity information such as browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement
- **Geolocation Data.** Geolocation data such as information that can be used to determine your physical location
- **Sensory Data or Recordings.** Sensory Data or Recordings such as audio, electronic, visual, or similar information that can be linked or associated with a particular consumer or household
- **Professional or Employment-Related Information.** Professional or employment-related information such as compensation, and current and past job history.
- **Education Information.** Education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).
- **Inferences Drawn from Personal Information.** Inferences drawn from personal information such as profile information about you which includes attributes such as preferences, characteristics, abilities, and aptitudes.
- **Sensitive Personal Information.** The following categories of sensitive personal information: (i) social security, driver's license, state identification card, or passport number; (ii) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (iii) Your precise geolocation (i.e. within 1850 foot radius); (iv) racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership; (v) the contents of your mail, email, and text messages unless the business is the intended recipient of the communication; (vi) biometric information for the purpose of uniquely identifying a consumer.

3) Categories of Sources of Personal Information

We collect the categories of personal information listed above from the following categories of sources:

- **Customers.** Directly from you, including when you provide information to us, and indirectly from you, such as when we automatically collect technical and usage information when you visit our website, applications, or social media accounts or when you use our products and services.
- **Third Parties.** Service providers, contractors, and other third parties that support our operations
- **Government.** Government authorities, agencies, and offices, including federal, state, and municipal.

4) Categories of Recipients

The categories of third parties (including service providers and contractors) to whom we disclose, sell or share personal information about a specific individual depends on, among other things, our relationship or interaction with a specific California resident. Such categories include the following:

- **Operational Support.** Entities acting as our service providers or contractors that we use to provide services to or for us to facilitate our business and commercial operations, to provide products and services to you, and to facilitate our business and commercial purposes. Some examples include internet service providers, software providers, financial technology partners, auditors, recruiters, and our agents and representatives
- **Marketing Support.** Marketing and advertising technology providers, advertising partners, and social media platforms, such as those involved in connection with our cross-context behavioral advertising activities
- **Customer Representatives.** Entities or individuals that represent California residents such as an accountant, agent, attorney, service provider, person holding power of attorney, and other representatives
- **Law Enforcement & Government.** Government agencies, including federal, state, and municipal agencies and authorities, courts, law enforcement, and other third parties to support regulatory and legal requirements
- **Affiliates.** Our affiliates
- **Mergers & Acquisitions.** Third parties, such as an acquiring entity and its advisors, in connection with a sale or business transaction, including to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.

We may also share your personal information with other third parties at your direction or with your consent.

5) Purposes of the Personal Information We Collect & Use

We may use personal information for one or more of the following business or commercial purposes:

- **Products & Services.** To perform activities related to evaluating, providing, servicing, personalizing, developing, and enhancing our website, applications, products, services, and accounts.
- **Communications.** To communicate with customers and related parties about website, applications, products, services, and accounts used or requested.
- **Marketing.** To perform marketing, targeted advertising, communications, research, and analytics activities

- **Research and Development.** To perform business research and improvement activities such as identifying opportunities and issues with existing products and services, planning improvements to existing products and services, and creating new products and services
- **Customer Service.** To perform customer service/quality assurance activities and manage complaints and inquiries
- **Human Resources.** To perform human resources activities to attract, hire, and maintain personnel such as to conduct recruiting and candidate evaluation activities and to inform our employment decisions.
- **Asset Security & Integrity.** To perform activities associated with maintaining the security and integrity of our personnel and our physical and digital assets, locations, and systems.
- **Financial.** To perform financial management activities associated with our financial, accounting, and tax interests.
- **Compliance.** To perform compliance activities associated with our legal, regulatory, and contractual obligations under applicable law
- **Legal.** To perform legal proceedings activities such as establishing, exercising, and defending our legal rights
- **Risk.** To perform risk management activities such as audit, compliance, controls and other risk management activities.
- **Fraud Prevention.** To perform fraud prevention activities such as the detection, prevention, and investigation of potential and actual incidents of fraud
- **Economic.** To advance our commercial or economic interests.
- **Mergers & Acquisitions.** To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- **Aggregation & Anonymization.** To aggregate and/or anonymize personal Information so that it will no longer be considered personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.
- **Other Purposes.** Any other purpose you consent to or as described to you when collecting your personal information before or at the time of collection.

6) Categories of Personal Information We Sell or Share

The terms sell and share are defined by the CCPA. The term “sell” generally means the disclosure of personal information to a third party for monetary or other valuable consideration. The term “share” generally means the disclosure of personal information to a third party for cross-context behavioral advertising (i.e. targeted advertising based on consumer’s personal information). Although we do not “sell” personal information as that term may be commonly interpreted, we engage in online activities that may constitute a sale of personal information under CCPA. This may include showing you advertisements on other websites.

In the 12 months preceding the “Last Reviewed” Date of this Notice, we have sold and/or shared the following categories of personal information to the following categories of third party recipients for the business or commercial purposes listed.

Categories of Personal Information	Sold and/or Shared	Categories of Recipients To Whom Sold or Shared	Business or Commercial Purpose for Sharing or Selling
Personal Identifiers	Yes	Marketing Support	Marketing
Personal Information Categories from Cal. Civ. Code § 1798.80(e)	No	N/A	N/A
Characteristics of protected classifications under California or federal law.	No	N/A	N/A
Commercial information.	No	N/A	N/A
Biometric information.	No	N/A	N/A
Internet or other electronic network activity information	Yes	Marketing Support	Marketing
Geolocation data.	Yes	Marketing Support	Marketing
Sensory Data or Recordings.	No	N/A	N/A
Professional or employment-related information.	No	N/A	N/A
Education information	No	N/A	N/A
Inferences drawn from personal information	Yes	Marketing Support	Marketing
Sensitive personal information.	No	N/A	N/A

7) Categories of Personal Information Disclosed to Service Providers or Contractors

In the preceding twelve (12) months, we have disclosed the following categories of personal information to a service provider or contractor for a business or commercial purpose.

- Personal Identifiers
- Personal Information Categories from Cal. Civ. Code § 1798.80(e)
- Characteristics of protected classifications under California or federal law.
- Commercial information.
- Biometric information.

- Internet or other electronic network activity information
- Geolocation data.
- Sensory Data or Recordings.
- Professional or employment-related information.
- Education information
- Inferences drawn from personal information
- Sensitive personal information.

8) Your CCPA Rights

CCPA Rights Overview.

Subject to certain exceptions, you have the right to request:

- The following information ("Request to Know"):
 - The categories of personal information we collected about you and the categories of sources from which we collected the personal information;
 - The business or commercial purpose for collecting, selling, or sharing personal information about you;
 - The categories of third parties to whom we disclosed personal information about you, and the categories of personal information disclosed;
 - The categories of personal information about you that we sold or shared and the categories of third parties with whom we sold or shared such personal information;
 - The categories of personal information about you that we disclosed for a business purpose and the categories of service providers or contractors to whom we disclosed such personal information; and
 - The specific pieces of personal information we collected about you.
- Deletion of personal information we collected from you ("Request to Delete").
- Correction of inaccurate personal information that we maintain about you ("Request to Correct").
- Opt out of the sale of personal information and to opt out of the sharing personal information for purposes of cross-context behavioral advertising ("Request to Opt-Out").

In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights, including the right as an employee, applicant, or independent contractor not to be retaliated against for exercising your CCPA privacy rights.

How to Exercise Your Rights to Know, Delete, or Correct.

You (or your authorized agent) may submit Requests to Know, Delete, or Correct by one of the following methods:

- **Web Form:** <https://submit-irm.trustarc.com/services/validation/short/e76ccbe1>

- **Phone:** 1-888-230-3621

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 decline to honor your request where an exception applies. Prior to processing your request we will require verification of your identity. We will verify your identity by matching information you provide with information we maintain, and we may request additional information where necessary to protect your information.

Additionally, if you use an authorized agent to submit a request, as part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent and verification of their identity prior to processing the request. 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.

How to Exercise Your Rights to Opt-Out of Sale and Sharing.

You may opt out of the sale and/or sharing of your personal information for purposes of cross-context behavioral advertising by clicking by using the following methods. To opt out of **all** sale and/or sharing, please take **both** of the two steps listed below:

- To opt out of personal information collected via online tags, cookies, pixels that automatically collect information when you visit our sites, please click [Do Not Sell or Share My Personal Information](#), go to www.fblake.bank and click “Do Not Sell or Share My Personal Information, or follow the instructions described below for “Opt-Out Preference Signals”.
- To opt out of other personal information sold to or shared with third parties, please submit a request using the link to the web form here: <https://submit-irm.trustarc.com/services/validation/short/c490846d>

Opt-Out Preference Signals. Your internet browser may also give you an option to control your privacy preferences via a Global Privacy Control (GPC) signal. This is a setting in your browser that notifies the websites you visit of your preferences to opt out of selling or sharing your personal information under California law. If you have opted out via the GPC signal, our sites will recognize this signal and process your preference automatically as it pertains to tags, cookies and pixels that collect personal information when you visit our site. Please note, you will need to enable the signal on each browser that you use, as the signal is processed at the browser-level and is not applied if you visit our site from a different browser or device that does not have the GPC signal enabled. To opt out of all sale and/or sharing when you have enabled a GPC signal, please **also** take **step #2**, above, under “**How to Exercise Your Rights to Opt-Out of Sale and Sharing.**”

For information about how to use the Global Privacy Control, please visit <https://globalprivacycontrol.org/>. for purposes of cross-context behavioral advertising.

Additionally, some browsers offer ability to send “Do Not Track” signals. There is no industry standard for how consumer browser settings for “Do Not Track” signals should work on commercial websites. Due to the lack of such standards, our Services may not respond to these “Do Not Track” browser settings.

9) Retention

Retention periods may vary depending on legal obligations, dispute resolution, and operational needs. We retain your personal information, including sensitive 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 and provide services to you, for example, for as long as you have an account with us or keep using our services, 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 require us to keep records of your transactions for a certain period of time before we can delete them; and
- Whether retention is advisable in light of our legal position, such as in regard to applicable statutes of limitations, litigation or regulatory investigations.

We may retain and use deidentified information without limitation to the extent permitted by law.

10) Individuals Under 16 Years of Age

We do not knowingly sell or share the personal information, including the sensitive personal information, of California residents under 16 years of age.

11) No Financial Incentives

We do not offer financial incentives or price or service differences in exchange for the retention, sale, or sharing of personal information. If we offer such a program in the future, we will provide a Notice of Financial Incentive describing material terms.

12) No Use of Sensitive Information to Infer Characteristics

We do not use your sensitive personal information to infer characteristics about you. We only collect or use sensitive personal information for the following business or commercial purposes permitted by CCPA:

- To perform the services or provide the goods reasonably expected by an average Consumer who requests those goods or services.
- To prevent, detect and investigate security incidents that compromise the availability, authenticity, integrity and/or confidentiality of personal information.
- To resist malicious, deceptive, fraudulent or illegal actions directed at the business and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a Consumer's current interaction with the business.
- To verify or maintain the quality or safety of a product, service or device that is owned or controlled by the business, and to improve, upgrade or enhance the service or device that is owned or controlled by the business.

- To collect or process sensitive personal information where the collection or processing is not for the purpose of inferring characteristics about a consumer.

As such, you do not have the right to limit the use and disclosure of sensitive personal information under the CCPA.

13) Automated Decision Making Technology (ADMT)

ADMT Use and Rights Overview

We may use automated decision making technology (“ADMT”) as part of our customer onboarding to make a decision about your application to open certain accounts. Specifically, the ADMT is used to assess whether an applicant meets our account eligibility criteria, which includes identity verification, fraud and account abuse risk screening, and review of existing or prior relationships with us. The ADMT uses a rules-based automated system that processes the personal information you submit as part of your account application, and any information derived from that application, against a defined set of eligibility criteria.

Specifically, the ADMT evaluates inputs such as your name, address, date of birth, Social Security number, and government-issued identification details (Personal Identifiers) to verify your identity and screen your information against fraud and sanctions databases. The ADMT also uses inferences drawn from that information, such as risk indicators derived from identity verification results or screening matches, to determine whether your application satisfies the eligibility requirements to approve or decline an application.

The ADMT generates either an approval or a decline decision based on the results of its automated rules evaluation. This determination is the primary output used to decide whether to approve or decline your account application.

While the ADMT determination is a significant factor in the approval or decline decision, we may also consider results of an additional manual review including information you provide at our request, existing or prior relationships with us, and internal account opening policies in reaching its final decision. Where additional review is performed, a trained representative will review the ADMT output together with these additional factors before a final determination is made.

You do not have the right to opt-out of our use of ADMT for evaluating your bank account application. We are not required to provide an opt-out of this use of ADMT because we provide a human appeal process. In place of an opt-out right, you have the right to appeal a significant decision made by an ADMT (a “Request to Appeal ADMT”). Following your appeal, a human reviewer with the authority to overturn the decision will be review and analyze the output of the ADMT and any other information that is relevant to change the significant decision at issue. The human reviewer will consider the information provided by you in support of your appeal and may consider any other sources of information about the significant decision.

You also have the right to access information about the logic and outcome of the ADMT (a “Request to Access ADMT”).

We are prohibited from and do not retaliate against consumers for exercising their CCPA rights related to ADMT.

How to Exercise Your Rights to Access ADMT and Appeal ADMT Significant Decisions.

You (or your authorized agent) may submit a Request to Access ADMT and a Request to Appeal ADMT by using the web form available here: <https://submit-irm.trustarc.com/services/validation/short/e76ccbe1>

To appeal a declined application, your submission should include:

- The date of your application and applicant name;
- A description of why you believe the decline decision should be reconsidered; and
- Any supporting information or documentation you would like the human reviewer to consider (for example, documentation correcting an error in your application, identity verification documents, or other relevant information).

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 decline to honor your request where an exception applies. Prior to processing your request we will require verification of your identity. We will verify your identity by matching information you provide with information we maintain, and we may request additional information where necessary to protect your information.

Additionally, if you use an authorized agent to submit a request, as part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent and verification of their identity prior to processing the request. 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.

14) No Discrimination or Retaliation

We will not discriminate or retaliate against you for exercising your CCPA rights. For example, we will not deny you goods or services, charge different prices, or provide a different level or quality of goods or services, except as permitted by law.

15) Deidentified Information

Where we maintain or use de-identified information, we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify the information.

16) Changes to this CCPA Notice

We reserve the right to periodically amend this Notice at our sole discretion at any time. When we make changes to this Notice, we will post the updated notice to our website and update the “Last Updated” date. Any changes will become effective when we post the revised Notice on the website as of the “Last Updated” date shown at the top of the Notice.

17) Contact Us

Please direct any questions or concerns related to this California Consumer Privacy Notice to us at privacy@fblake.bank or by mail to 4558 Osage Beach Parkway, Suite 100, Osage Beach, MO 65065.