



CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

REV. 8/28/2020

Legal Entities

Banterra Bank legal entities and subsidiaries of Banterra include Banterra Insurances Services, Inc., Marion West, Inc., Christopher Building Corp, Banterra NV, Inc., as well as the following affiliates: Title Professionals, Inc., Banterra Statutory Trust II, HCB AcquisitionCo, Banterra Air, Inc.

Applicability

Your privacy is important to us. This California Consumer Privacy Act Disclosure explains how the legal entities listed above ("Company," "we," or "us") collect, use, and disclose personal information relating to California residents covered by the California Consumer Privacy Act of 2018 (CCPA). This notice is provided pursuant to the CCPA. Download a printable copy of the Act [here](#).

Introduction

Under the CCPA, 'Personal Information' is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The CCPA, however, does not apply to certain information.

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregate consumer information.
- Other information to the extent excluded from the CCPA's scope, like:
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act of 1994;
 - Health or medical information that constitutes clinical trial data or that is otherwise covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH), or the California Confidentiality of Medical Information Act (CMIA);
 - Personal Information we may collect from a natural person (including, without limitation, emergency contact information for that natural person and such other Personal Information we may need in order to administer benefits for such natural person) in the course of the natural person applying for a job with us or otherwise in connection that natural person acting as our employee, owner, director, officer, medical staff member, or contractor; and
 - Personal Information we may collect from a natural person who is acting as an employee, owner, director, officer, or contractor of another company with which company we are communicating or for which company we are otherwise evaluating or actually providing a product or service.

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For more information about how we collect, disclose, and secure information relating to these customers, please refer to [Banterra's Privacy Disclosure](#).

We value your relationship with us and keeping Personal Information secure is one of our top priorities. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These

Collection of Personal Information

Within the last 12 months, we have collected the following categories of Personal Information relating to California residents covered by this disclosure:

<u>Categories</u>	<u>Category Examples</u>
Biometric Information	Identifying information such as fingerprints or keystrokes
Characteristics	Age, sex and marital status
Commercial Information	Record of personal property, transaction and purchase history
Education Information	Student records and directory information
Geolocation Data	Internet Protocol (IP) location and Device location
Identifiers	Name and government-issued identifier such as Social Security number
Inferences Drawn From Other Personal Information	Individual's preferences and characteristics
Internet Or Network Activity Information	Browsing history and interactions with our website
Personal Information	Financial and contact information
Professional Or Employment-Related Information	Work history, prior employer and performance evaluations
Sensory Information	Audio, call, video recordings or similar information

We obtain the above Personal Information from multiple categories of sources including:

- Directly from a California customers and consumers, via online an offline interactions
- Service Providers, marketing and analytics providers and other third parties
- Public Record Sources (Federal, State or Local Government), Credit Bureaus
- Information from our Affiliates
- Mobile App and Social Media activity as well as Website
- Information from Client Directed Third Parties or Institutions representing a Client/Prospect
- Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member)

Disclosure of Personal Information

We may use or disclose the Personal Information collected for business purposes to third party categories which include:

- Affiliates and Subsidiaries of Banterra Bank
- Government Agencies as required by law, court order or regulations
- Other Third Parties who assist Banterra in online and mobile transactions, mortgage support and fulfillment services, loan processes, credit and similar requests
- Partners and Third Parties who provide services such as payment, banking and communication systems, storage, legal and tax expertise, notaries and auditing services that promote the bank and its financial services and products to customers and other prospective buyers
- Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related systems, email delivery, auditing, marketing and marketing research activities

Use of Personal Information

We may use or disclose the Personal Information listed in the above table for any one or more of the following business purposes:

- To complete services requested by the customer. Examples include: opening a bank, loan or mortgage account, maintaining and servicing accounts, performing transactions or processing orders, verifying customer information for customer service, or providing similar services.
- To identify security threats and protect against malicious, deceptive, fraudulent, or illegal activity and to pursue legal action for those responsible for such activity.
- To improve, upgrade, or enhance our systems.
- To validate and maintain the quality or safety of a service controlled by Banterra.
- To provide email alerts and other information concerning products or services.
- To perform and enforce contractual obligations entered into between an individual consumer and Banterra, including billing and collections.
- To comply with laws and regulations and to fulfill other legal processes and requirements.
- To comply with necessary and appropriate audits and reporting related to particular transactions and interactions, including online and mobile interactions.
- To enhance website and mobile app, and present relative content.
- To deliver customized ads shown as part of the same interaction online. The personal information used is not disclosed to a third party and is not used to build a profile or otherwise alter an individual consumer's experience outside the current interaction.
- To test for internal research, analysis and product development.
- To fulfill tasks otherwise described to the consumer when collecting Personal Information or as otherwise set forth in the CCPA.

Sale of Personal Information

In the past 12 months, we have not "sold" Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Disclosure, "sold" means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Rights under the CCPA

If you are a California resident, you have the right to know what categories of personal information will be collected and the purposes for which these categories will be used. Consumers have the right to:

- Request that we disclose, free of charge, the following information pertaining to the collection and use of your Personal Information over the past 12-months:
 - the categories of Personal Information about you that we've collected;
 - the categories of sources from which the Personal Information was collected;
 - the purpose for collecting the Personal Information;
 - the categories of third parties with whom we shared Personal Information;
 - the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 - the specific pieces of Personal Information we collected about you;
- Request that we delete Personal Information we've collected from you, to the extent possible, unless the CCPA recognizes an exception; and
- Be free from unlawful discrimination for exercising your rights under the CCPA.

The identities of individuals requesting deletion or disclosure of their personal information must first be verified to protect against fraud and identity theft. If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

Upon receipt of your request, we will advise you of the expected timeframe it will take to process and any additional information required to verify your identity.

The below instances may halt our ability to honor your request:

- If we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual;
- If state and federal regulations governing financial institutions and statutory exemptions limit what Personal Information we are able to disclose or delete;
- If Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

In our response, we will notify you if we are not able to honor your request. We will not provide driver's license numbers, social security numbers, or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any sensitive information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

All verified requests will be processed within 45 days pursuant to the CCPA, unless otherwise noted. If we require an extension (for up to an additional 45 days) in order to process your request, an explanation will be provided to you regarding the delay.

How to Exercise Your Rights

If you are a California resident, you can request to view or delete eligible personal information under the California Consumer Privacy Act (CCPA). You may submit a request by:

1) Send your request via mail or email

- **Mail request to Banterra Bank, PO Box 310, Marion, IL 62959**

Please provide contact information so we may reach you to verify your request and identity.

- **Email request to Privacy@Banterra.com**

2) Call 866-BANTERRA (226-8377)

Contact Us:

Email Privacy@Banterra.com if you have any questions about this Disclosure or the measures we take to collect and protect your Personal Information.

Changes to This California Consumer Privacy Act Disclosure:

Periodically, changes to this Disclosure may be necessary. We reserve the right to update this Disclosure at any time and we'll post the revised Disclosure on this page.