

Columbia Bank California Consumer Privacy Act Policy

Effective Date: January 1, 2020

This California Consumer Privacy Act Policy (CCPA Policy) explains information practices online on our website (www.columbiabank.com), and our other related mobile websites, services, tools, mobile applications and other applications and services covered (“Services”). Please [contact us](#) if you have any questions.

Summary

Should there be any discrepancy between the summary table below and the full CCPA Policy, the language of the full CCPA Policy shall govern.

	Scope and Consent	This CCPA policy covers information practices of Services covered. Your use of the Services is also governed by the Terms of Use .
	Collection	We collect the following personal information when you use the Services: <ul style="list-style-type: none">• Identifiers• Other content or information you share on the site• Geolocation information• Payment or other financial and transaction information• Internet or other electronic network activity information• Cookies and tracking technologies• Information from outside sources
	Use	We use information collected from you for a variety of business and commercial purposes, such as to provide, maintain and improve our Services, process or fulfill transactions, manage accounts, analyze traffic and use of our Services, and to target products and services to you on or off the Services.
	Retention	We retain your personal information for as long as needed to comply with our legal obligations and other business purposes, even if you no longer use the Services or maintain an account with us.
	Disclosure	We may share your personal information and other information we collect with the following entities: Columbia Bank and the rest of our corporate family; service providers; ad tech vendors; legal and law enforcement; new owners where there is a change of corporate control; and others with your consent.
	Summary of Information	You can view a summary of the personal information we have collected, used, and shared in the last 12 months.
	Rights for California Residents	If you are a California resident, you have rights of access, deletion, non-discrimination, and to opt-out of the “sale” of your personal information. We honor these rights for CA residents. Note: Columbia Bank will seek to honor requests to exercise the above rights made by non-California residents to the extent required by applicable law

	Communication Preferences	You can opt out of receipt of marketing messages from us through your account/profile settings.
	Additional Choices	You can withdraw your consent to the collection of your personal information at any time without affecting the lawfulness of consent-based processing before its withdrawal.
	Tracking Technologies (Cookies)	We use tracking technologies (including cookies) to recognize you, customize your experience on the Services, and target the content/advertising you see. For more information about the use of cookies and similar technology on our online services, please review this CCPA Policy. We offer an opt-out for “sales” of personal information as discussed in Section 4.
	Third Parties	We are not responsible for the privacy practices of third-party websites that are linked to our Services.
	Security	We seek to protect your personal information by using reasonable security measures, including the encryption of your data.
	Children’s Privacy	The Services are not intended for individuals under the age of 16. We do not knowingly collect personally identifiable information from users within this age group.
	Notification Regarding Updates	You agree that we may notify you about material changes to this CCPA Policy by posting notices on the Services.
	Contact Us	For more information about our privacy practices, go to our full CCPA Policy , send an email to ClientCare@columbiabank.com , or call us at 1-877-272-3678.

Full CCPA Policy

1. Scope and Consent.

When you use the Services, you are contracting with Columbia Bank. This CCPA Policy describes how we may collect, use, retain, and disclose your personal information.

2. Information Practices: How we collect, use, retain, and disclose personal information.

Collection.

When you use our Services, we collect the below types of information from and about you. Some of this information may be considered “personal information,” meaning it reasonably identifies you or your device or it is reasonably associated with you. We also collect, use, and disclose aggregated or deidentified data that does not identify you or your device and is not subject to this CCPA Policy.

Personal Information You Provide

You can browse our Services without actively submitting any information about yourself, but you may choose to provide us with personal information through the Services. For example, you may provide:

Identifiers: To register for an account with us, create a profile for your account, open a financial account, and sign up to receive email updates, you may provide personal information such as name, physical address, email address, phone number, your Social Security number, and similar information you choose to provide.

Payment or Other Financial Information (Categories of Information in California Civil Code 1798.80): You may submit credit history, other payment or billing information in connection with the opening of an account or any other product or service you have with us.

Automatically Collected Information

We automatically collect personal information when you access and use our Services, including:

Identifiers: Identifiers such as your IP address, Internet service provider (ISP), mobile advertising ID, media access control (MAC) address, and identifiers associated with browser cookies, web beacons and similar technologies we deploy on our services.

Internet or Other Electronic Network Activity Information: We may collect information about the devices and computers you use to access our Services such as browser type, language, operating system, the referring web page, pages visited, and hyperlinks clicked. When you visit our Services, we collect usage information sent to us by your computer, mobile, or other access device that tells us how you are using the Services and other information about your internet activity (“usage information”).

Geolocation information: If you choose to install our mobile application and allow the use of your device’s location, we may receive geolocation data. We may also collect your IP address to estimate your approximate location.

Cookies and Other Tracking Technologies

We use tracking technologies (including [pixel tags](#), [cookies](#), [flash cookies](#), [web beacons](#), [clear GIFs](#), [embedded scripts](#), [JavaScript](#), [local storage](#) and [e-tags/cache browsers](#)) to collect usage information. We may use software tools to measure and collect session information, including page response times, download errors, time spent on certain pages and page interaction information. For more information, see the [Tracking Technologies section](#).

Information from Outside Sources

We may collect personal information about you from other sources. For example, we may collect personal information about you from analytics companies, advertising networks, demographic companies, other vendors that provide us with information

and public data in certain instances so we can better understand you and provide you with information, offers, and products and services that may be of interest to you.

Employment Information: We collect employee data from outside vendors for human resources and payroll purposes. We may also collect employment-related information from credit bureaus, former employers, schools, or references to process and evaluate applications for positions with Columbia Bank or for other administrative purposes.

Use.

We collect personal information for a variety of business and commercial purposes, such as to:

- Provide, maintain, and improve our Services, as well as to develop new content and features;
- Process or fulfill payments or transactions;
- Provide customer service (e.g., to resolve disputes, feedback, problems with your account/profile or the Services);
- Create and manage your account or preferences;
- Send notifications related to your account and transactions;
- Send newsletters and promotional messages you request;
- Conduct internal research and development;
- Analyze traffic and user activities on our Services, identify popular areas or features, and optimize and personalize the Services;
- Debug, identify and repair errors that impair the functionality of our Services;
- Process and evaluate applications for positions as an employee or contractor with us;
- Protect the rights and property of Columbia Bank and others and comply with our legal obligations, including to detect, investigate, and prevent fraud and other illegal activities and to enforce our agreements;
- Verify your identity (such as when you access your account information);
- For any purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or deidentified basis (such that it does not identify any individual customers) for various business purposes, when permissible under applicable laws and regulations.

Data Retention.

Your information will be retained for as long as needed for us to comply with our contractual obligations, employment obligations, and other business purposes, including global legal obligations to retain data. We may retain some information from closed accounts so that we can comply with law, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our Terms of Use, or take other actions permitted by law.

Disclosure.

Information collected may be shared with:

The Columbia Bank Corporate Family: We may share the information we collect about you with companies related by common ownership or control which include Columbia Trust Company and Columbia Banking System.

Service Providers: We may disclose your information to service providers under contract who help with our business operations (such as fraud investigations, bill collection, payment processing, web hosting, and research). We may also share your information with legal, financial, insurance and other advisors in connection with corporate transactions, the management of our business and operations, to defend against legal claims; to investigate, prevent, or act against illegal activities, suspected fraud, situations involving potential threats to safety, or violations of Columbia Bank's terms of use; to protect our operations, assets, and intellectual property; to allow us to pursue appropriate legal remedies or limit damages; to pursue any reorganization, merger, sale, joint venture, assignment, transfer of assets, or other disposition of all or any portion of our business, assets, or stock; or as otherwise required by law.

Unaffiliated Websites and Businesses: Non-affiliates are companies not related by common ownership or control. They can be financial and nonfinancial companies. Columbia Bank does not share with non-affiliates so they can market to you.

Advertising Technology (“Ad Tech”) Vendors: On the Services, we may work with third parties to serve advertisements, provide us with data collection, reporting, and ad response measurement and assist with delivery of relevant marketing messages and advertisements. These third parties may view, set, or edit their own tracking technologies/cookies that are deployed when you visit our Services. The use of these technologies by these third parties is subject to their own privacy policies and we encourage you to review them. They might also obtain information about other applications that you have downloaded to your mobile device, the mobile websites you visit and other information about you or your device in order to analyze and serve targeted advertising on the Services and elsewhere. For more information about third party ad servers and your ability to opt-out of targeted advertising from such third parties, please visit [Ad Choices](#).

Legal and Law Enforcement: Law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity that may expose us, you, or any other Columbia Bank user to legal liability. In such events, we will only disclose information relevant and necessary to the investigation or inquiry, such as name, city, state, ZIP code, telephone number, email address, user ID history, IP address, fraud complaints, and anything else we may deem relevant to the investigation.

Change of Control – New Owners: We may transfer your personal information as an asset that is part of a merger, acquisition, bankruptcy or other transaction where a third party assumes control of all our part of our business.

Other Entities with your Consent. Other third parties at your specific direction.

3. Summary of Information Practices in Last 12 Months.

The following table summarizes personal information collection, use, and sharing practices in the preceding 12 months since we last updated this CCPA Policy on January 1, 2020.

Categories of Personal Information	Categories of Sources	Commercial / Business Purpose(s) for Collection	Categories of Vendors (including third parties and service providers) to which Personal Information is Disclosed	Categories of Third Parties to whom data is sold
Identifiers, such as name, username, password, email address, physical address, phone number, Social Security number, and mobile phone number.	<ul style="list-style-type: none"> You Service Providers 	<ul style="list-style-type: none"> Maintaining and servicing accounts Providing customer service Processing or fulfilling transactions Providing, maintaining and improving the Services and products and services Marketing and advertising Analytics regarding use of Services Internal research Communications with you with you at your request 	<ul style="list-style-type: none"> IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us Data analytics providers Ad networks, ad tech vendors, and other marketing and advertising vendors 	<ul style="list-style-type: none"> IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us Data analytics providers Ad networks, ad tech vendors, and other marketing and advertising vendors

<p>Internet or Other Electronic Network Activity Information, such as IP address, unique device ID, domain information, pages visited, and tracking technologies (e.g., pixel tags, cookies) to collect usage information. For more information, see Tracking Technologies.</p>	<ul style="list-style-type: none"> Your mobile devices and computers used to access our Services 	<ul style="list-style-type: none"> Analytics regarding use of Services Internal research Marketing and advertising Providing, maintaining and improving the Services and products and services 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors Data analytics providers IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors Data analytics providers IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us
<p>Geolocation data, such as location of a mobile device.</p>	<ul style="list-style-type: none"> Your mobile device or computer used to access our Services 	<ul style="list-style-type: none"> Providing, maintaining and improving the Services and products and services Marketing and advertising Analytics regarding use of Services Internal research 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors Data analytics providers IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors Data analytics providers IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us
<p>Payment or Other Financial Information (Information under California Civil Code 1798.80), such as credit history and credit score.</p>	<ul style="list-style-type: none"> Outside sources such as credit bureaus 	<ul style="list-style-type: none"> Processing or fulfilling transactions 	<ul style="list-style-type: none"> Service providers such as payment processors, ATM or debit card processors, online banking platforms, credit bureaus, and others as necessary to provide services to us 	<ul style="list-style-type: none"> Service providers such as payment processors, ATM or debit card processors, online banking platforms, credit bureaus, and others as necessary to provide services to us
<p>Commercial Information, such as Information about Columbia Bank services purchased, obtained, or considered.</p>	<ul style="list-style-type: none"> You 	<ul style="list-style-type: none"> Processing or fulfilling transactions Providing customer service Services analytics Internal research 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors IT vendors, cloud computing providers, database 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors IT vendors, cloud computing providers, database

		<ul style="list-style-type: none"> Marketing and advertising Providing, maintaining and improving the Services and products and services 	providers, customer service vendors and other service providers that that need access to such information to perform services for us	providers, customer service vendors and other service providers that that need access to such information to perform services for us
Demographic Information, such as gender, areas of interest.	<ul style="list-style-type: none"> You 	<ul style="list-style-type: none"> Analytics regarding use of Services Internal research Providing, maintaining and improving the Services 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that need access to such information to perform services for us 	<ul style="list-style-type: none"> Ad networks, ad tech vendors, and other marketing and advertising vendors IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that need access to such information to perform services for us
Professional or Employment-related Information, such as job history, educational history.	<ul style="list-style-type: none"> You Outside sources such as credit bureaus, former employers, schools, references 	<ul style="list-style-type: none"> Process and evaluate applications for positions with Columbia Bank Administrative purposes 	<ul style="list-style-type: none"> Service providers such as HR vendors and others as necessary to provide services to us 	<ul style="list-style-type: none"> Service providers such as HR vendors and others as necessary to provide services to us
Inferences, such as interests.	<ul style="list-style-type: none"> Derived from above sources/types of information 	<ul style="list-style-type: none"> Maintaining and improving the Services and our products and services 	<ul style="list-style-type: none"> IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us Ad networks, ad tech vendors, and other marketing and advertising vendors 	<ul style="list-style-type: none"> IT vendors, cloud computing providers, database providers, customer service vendors and other service providers that that need access to such information to perform services for us Ad networks, ad tech vendors, and other marketing and advertising vendors

Sale of Personal Information: We do not sell your information for money but we and our business partners use tracking technologies to help us to understand our customers and visitors to the Services, to enhance your online experience, and customize our offerings in ways that may be deemed a “sale” of personal information under the California Consumer Privacy Protection Act (CCPA). This includes working with third parties such as ad networks which collect personal information via tracking technologies to personalize and serve advertisements on and off our Services, provide us with data collection,



reporting, and ad response measurement. **To the extent we or our partners use such technologies on the Services, we offer an opt-out as discussed in Section 4.**

We do not knowingly sell or otherwise disclose the personal information of minors under 16.

4. Choices for Access, Deletion, Opt-Out of Sale, and Right to Non-Discrimination for California Residents or As Required By Law.

If you are a California resident, you have the right to know what personal information we collect, disclose, and “sell” about you (as that term is used in the CCPA). Additionally, you have the right to access, delete and opt out from the “sale” of your personal information.

If you are not a California resident, Columbia Bank will seek to honor requests to exercise the above rights made by non-California residents to the extent required by applicable law.

To exercise these privacy rights and choices, please follow the instructions below:

- **How to Request Access to Personal Information:** You may request access to your personal information twice in a 12-month period. To do so, please complete the webform in [Columbia Bank Privacy Rights Portal](#) or call 1-877-272-3678, or if in person at one of our branches, request a form that you can fill out to submit your request. Account holders can request access to their personal information at any time by logging into their accounts on the Services. In response, we will produce an Access Report detailing the personal information we have collected, disclosed, and/or sold about you. This Access Report will be delivered by mail or electronically at your request.
- **How to Request Deletion of Personal Information:** You may request that Columbia Bank delete the personal information it has collected and/or maintained about you. To do so, please complete the webform in [Columbia Bank Privacy Rights Portal](#) or call 1-877-272-3678, or if in person at one of our branches, request a form that you can fill out to submit your request. Note, we may need to retain certain personal information as permitted by law, such as to complete the transaction for which the personal information was collected, provide a requested service, detect security incidents, protect against malicious, deceptive, fraudulent or illegal activities, comply with legal obligations such as those required by the Gramm-Leach-Bliley Act or the California Financial Privacy Act, or to enable solely internal uses that are reasonably aligned with your expectations or lawful within the context in which you provided the information.
- **How to Opt-Out of the Sale of Personal Information:** We offer an opt-out from the use of cookies and other tracking technologies in connection with our Services, which may in some cases constitute the sale of your personal information under the CCPA or other privacy laws. To opt-out of the sale of your personal information, please click [Do Not Sell My Personal Information](#) or fill out the webform at the [Columbia Bank Privacy Rights Portal](#). This will cause information to cease to be added to any cookies or other tracking technologies that have been set on our Services or block them entirely. Please note that you will need to opt out again if you visit one of our Services from a different device or browser or if you clear your cookies.

Verification: Please note, we will take steps to verify your identity before fulfilling any of the above requests. If you maintain an account with us, we will verify your identity through existing authentication practices for the account. If you are not a registered member, we will verify your identity by matching two or three data points that you provide with data points that we maintain and have determined to be reliable for the purposes of verification.

Authorized Agents: You can use an authorized agent to make requests on your behalf. We may require the agent to provide written permission and verify his/her identity or demonstrate that he or she has power of attorney in connection with a request for access or deletion.

Anti-Discrimination Right: You have the right to be free from discrimination in product quality, goods or services because you decide to exercise your privacy rights under the CCPA.

Do Not Track Signals: Columbia Bank does not respond to Do Not Track signals to the extent received from a web browser. Because there currently is not a universally accepted technological or legal standard for recognizing or honoring Do Not Track signals as reflecting user's choice, we do not respond to them at this time. Once such technology is created and has received applicable regulatory approval, we will consider whether it is possible, and if so, how it can be incorporated within Columbia Bank's environment in the future.

5. Communication Preferences and Marketing (Opt-out).

If you do not wish to receive marketing communications from us, you can indicate your communications preference within the direct communication from us or through your account/profile settings. You may not opt-out of administrative emails (for example, emails about your transactions or policy changes) for your registered account.

6. Additional Choices.

If you have consented to our collection of your personal data for multiple specific purposes or explicitly consented to our collection of special/sensitive categories of personal data (i.e., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) your consent can be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.

For information about how to access, delete, or update your personal information or opt out of the sale of your personal information, go to [Section 4 \(Choices for Access, Deletion, Opt-Out of Sale, and Right to Non-Discrimination for California and other U.S. Residents.\)](#).

7. Tracking Technologies (Cookies).

When you visit the Services, we and our business partners may use tracking technologies to enhance your online experience, offer you relevant products and services, or customize our offerings. We use cookies to facilitate site navigation, to monitor responses to our advertisements, and to continually improve our website design and functionality for our account holders and visitors.

Note: Regarding our use of tracking technologies (cookies):

- We offer certain features that are available only through the use of tracking technologies.
- We use both session and persistent tracking technologies. Tracking technologies (e.g., cookies) can either be persistent (i.e., they remain on your computer until you delete them) or temporary (i.e., they last only until you close your browser). You are always free to decline tracking technologies if your browser permits, although doing so may interfere with your use of the Services. Refer to the help section of your browser, browser extensions, or installed applications for instructions on blocking, deleting, or disabling tracking technologies such as cookies.
- If you are a registered user and you specifically request that our Services remember your login information, you are allowing us to place a permanent cookie onto your computer.
- You may encounter tracking technologies/cookies from our service providers, that we have allowed on our site that assist us with various aspects of our website operations and services.

- You also may encounter tracking technologies from third parties on certain pages of the websites that we do not control and have not authorized. (For example, if you view a web page created by another user, there may be a cookie placed by that web page).

“Do Not Sell” Opt-Out: To the extent we or our partners use such technologies on the Services, we offer an opt-out as discussed in [Section 4](#).

8. Third Parties.

Our Services may contain links to other third-party websites. Columbia Bank may provide links to websites that are owned or operated by other companies. When you use a link online to visit a third-party website, you will be subject to that website’s privacy and security practices. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website. We are not responsible for the privacy practices or the content of these third-party sites.

9. Security.

We maintain reasonable technical, physical, and administrative security measures designed to help protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration. Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

It is your responsibility to make sure that your personal information you submit is accurate. If you believe that your login credentials have been compromised, please make sure to contact us as indicated in the [Contact Us Section](#), below.

10. Children's Privacy.

Services are not intended for individuals under the age of 16. We do not knowingly collect personal information via Services from users in this age group. We request that such individuals do not provide personal information through the Services.

11. Notification Regarding Updates.

We will change this CCPA Policy from time to time. When we make changes, we will revise the date at the top of the policy and, in some cases, will notify you through the Services, such as on our homepage, or via email or other communication. Any changes to this CCPA Policy will become effective when posted unless indicated otherwise.

12. Contact Us.

If you have further questions, you may email us at ClientCare@columbiabank.com or call us at 1-877-272-3678.