

Midwest BankCentre and Rising Bank, A Division of Midwest BankCentre Privacy Notice for California Residents

Effective Date: January 1, 2020

Last Reviewed on: May 1, 2020

This **Privacy Notice for California Residents** supplements the information contained in Midwest BankCentre and Rising Bank, A Division of Midwest Bankcentre's (Rising Bank) [<https://www.risingbank.com/privacy-policy>] and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**"). In particular, we have collected through various methods, including, without limitation, Rising Bank and Midwest BankCentre's websites, mobile banking applications, and any other presence of both Rising Bank and Midwest BankCentre, the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, Individual Taxpayer Identification Number, driver's license number, passport number, consular card number, telephone number (home, cell, or business), signature, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex	YES

under California or federal law.	(including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, Universal loan identifier, loan and deposit information related to HMDA and CRA reporting and providing loan and deposit products and services, asset and financial information, automobile/personal/commercial property information, liabilities, loan balances, taxes, judgements, bankruptcies, foreclosures.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. This would include IP addresses, comments on Rising Bank and Midwest BankCentre social media sites (facebook, twitter, linkedin, YouTube, etc.), user id or other id related to login information, bill pay payee information (addresses, phone numbers, account numbers, email addresses, electronic signatures).	YES
G. Geolocation data.	Physical location or movements while on computer or mobile phone accessing our website or app.	YES
H. Professional or employment-related information.	Current or past job history or performance evaluations, job title, length of employment.	YES
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES

Part 99)).		
J. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - 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; or
 - 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 (FIPA), and the Driver's Privacy Protection Act of 1994.

Rising Bank and Midwest BankCentre obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you open or apply for at the Bank.
- From our service providers, our processing systems, and from our website and applications
- From our marketing service providers
- From third party providers with your authorization
- From our employees
- From your employer
- From educational institutions
- From third party sources, including information from commercially available sources, such as public databases and data aggregators.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To create, maintain, customize, and secure your account with us.
- To process your transactions and prevent transactional fraud.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To verify your identity and identity documentation, authenticate and transact business for you, protect you and your accounts from fraud; and to perform quality control monitoring
- To evaluate your creditworthiness and report to consumer reporting agencies, such as credit bureaus
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To aggregate data that may not identify you allowed by law.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations and to file any and all required state or federal government related reports.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Rising Bank and Midwest BankCentre will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

Rising Bank and Midwest BankCentre may disclose your personal information to a third party for a business purpose. **We do not sell this information.** When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. When we disclose personal information for a business purpose, we may also disclose personal information to provide a service to you.

We share your personal information with the following categories of third parties:

- Service providers.
- Rising Bank and Midwest BankCentre affiliates and subsidiaries
- Law enforcement and government agencies

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

To verify your identity, authenticate transactions you initiated or initiated on your behalf and process transactions and services, protect and prevent fraud, government reporting requirements, to credit bureaus.

Category B: California Customer Records personal information categories.

To verify your identity, authenticate transactions you initiated or initiated on your behalf and process transactions and services, protect and prevent fraud, government reporting requirements, to credit bureaus.

Category C: Protected classification characteristics under California or federal law.

Demographic information, such as race, gender, and ethnicity, age, etc. to properly follow antidiscrimination laws and regulations.

Category D: Commercial information. Transaction information was disclosed to provide products and services that we believe would be beneficial to you, based our experiences and your past activity.

Category E: Biometric information. Biometric data was disclosed for Bank promotions (with consent), transaction verification, identify fraudulent transactions and investigate fraud claims.

Category F: Internet or other similar network activity. Information related to your visits to Rising Bank and/or Midwest BankCentre websites, internet banking platform, mobile applications, cash management services, billpay transactions. Comments and interactions on the Bank's social media sites to identify fraudulent transactions, identify you, and capture and analyze site usage and market products to you.

Category G: Geolocation data. We disclose this data to identify fraudulent transactions and investigate fraud claims, identify branch locations or ATMs, make recommendations for products or services.

Category H: Professional or employment-related information. Professional or employment related data was disclosed to verify employment, authenticate transactions, and underwrite credit.

Category I: Non-public education information. Professional or employment related data was disclosed to verify employment, authenticate transactions, and underwrite credit.

Category J: Inferences drawn from other personal information. Rising Bank and Midwest BankCentre disclosed this information for underwriting credit and to market products and services to you.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We do not provide any incentive, financial or otherwise, to customers to retain or sale their personal information. We do not provide incentives to deter customers or discriminate against any customer or their exercise of any privacy rights under applicable laws.

Your Choices and Rights

Rising Bank and Midwest BankCentre are regulated financial institutions. We collect and disclose personal information according to this and our privacy policy. At all times, you should ensure that your account information is updated and accurate.

Third Party Advertisers

Rising Bank and Midwest BankCentre use third party advertisers and technologies to track your activities on our websites, mobile apps, and landing pages via use of cookies and pixels, and/or web beacons. Advertisements may be based on current and past web search histories via our, or our banks providers may have. We, and our third parties, use this information to provide the most appropriate advertising to you. Any website that is not owned by Rising Bank or Midwest BankCentre has its own policies related to privacy and use of information. We use third party providers that may collect this information to provide better services to you. You can opt-out of some of this advertising by following the instructions of the Digital Advertising Alliance at <http://youradchoices.com> and at Google Analytics Opt-Out webpages. You can also contact us as described below.

You can remove cookies from your browser by following the directions in the “help” menu via your Internet Browser. This may hinder your experience and use of our websites.

Your mobile devices may also be used to access our websites and applications. You may block or restrict certain information (e.g. location information) to restrict our use of the information; however, this may not allow us to properly direct you to our ATMs or bank locations.

We also use links on our websites to third party providers (i.e. check printing services, regulators, advertising partners, etc.). These links have pop-up messages when you are leaving our webpage and give you the option to remain on our site or proceed to the third parties site.

Changes to Our Privacy Notice

Rising Bank and Midwest BankCentre reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which Rising Bank and Midwest BankCentre collects and uses your information described below and in the general **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Rising Bank

Phone: 1-888-222-9484

Website: www.risingbank.com

Email: support@risingbank.com

Postal Address:

Midwest BankCentre

Attn: Rising Bank Online Banking Dept.

2191 Lemay Ferry Road, St. Louis, MO 63125

Midwest BankCentre

Phone: 1-800-894-1350

Website: www.midwestbankcentre.com

Email: support@midwestbankcentre.com

Postal Address:

Midwest BankCentre

Attn: Online Banking Dept.

2191 Lemay Ferry Road, St. Louis, MO 63125