



Headquarters
P.O. Box BW Hagåtña, Guam 96932
Tel: (671) 472-5300

Member FDIC

CALIFORNIA CONSUMER PRIVACY ACT NOTICE

APPLICABILITY

Your privacy is important to us. This California Consumer Privacy Act Notice (“Notice”) explains how Bank of Guam (“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.

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 or household. This information is referred to in this Notice as “Personal Data”. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (GLBA).

The specific Personal Data 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 example, this Notice does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our Privacy Policy located on our website at <https://www.bankofguam.com/privacy-security.html>

Collection and Disclosure of Personal Data

We collect and disclose Personal Data in a variety of contexts. For example, we collect and disclose Personal Data to provide individual and commercial financial products and services, and for our employment and human resource purposes.

The Personal Data that we collect, use, or disclose about a specific California resident will depend on, for example, our relationship or interaction with that individual.

In the past 12 months, we have collected and disclosed to third parties for our business purposes, the following categories of Personal Data relating to California residents covered by this Notice:

1. Personal unique identifiers, such as full name and federal and state issued identification numbers including Social Security number, driver's license number and passport number;
2. Personal data or information including contact details such as telephone number and address, financial information such as account number and balance, payment card details including credit and debit card numbers, as well as medical and health insurance information;
3. Characteristics of protected classifications under California or Federal law include race, color, national origin, religion, gender (including pregnancy), disability, age, and citizenship status;
4. Commercial information, such as transaction information and purchase history;
5. Internet or online information, such as browsing history and interactions with our website;
6. Geolocation data, such as device location and Internet Protocol (IP) location;
7. Audio, electronic, visual and similar information, such as call and video recording;
8. Professional or employment-related information, such as work history and prior employer;
9. Education information, such as student records and directory information.

The categories of sources from whom we collected this Personal Data are:

1. Directly from a California resident or the individual's representatives through physical (e.g., paper application), audible (e.g., phone), or electronic (e.g., website, social media) sources;
2. Service Providers, Consumer Data Resellers and other third parties, outside companies or organizations from whom we collect personal data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets;
3. Public Record Sources (Federal, State or Local Government Sources) or widely available sources, including information from the media, and other records and information that are made available by federal, state, or local government entities;
4. Information from our Affiliates;
5. Website/Mobile App Activity/Social Media;
6. Information from Client Directed Third Parties or Institutions representing a Client/Prospect;
7. Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member);
8. Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing;
9. Outside companies or organizations from whom we collect Personal Data to support human resource and workforce management activities.

The categories of third parties to whom we disclosed Personal Data for our business purposes described in this Notice are:

1. Affiliates and Subsidiaries of Bank of Guam;
2. Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing and marketing research activities;
3. Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers and other prospective buyers;
4. Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, vehicle loan processes and aggregators (at the direction of the customer);
5. Companies or individuals that represent California residents such as an accountant, financial advisor, or holding power of attorney;
6. Outside companies or organizations, including service providers, to whom we provide Personal Data to support human resource activities and workforce management;
7. Government Agencies as required by laws and regulations to support regulatory and legal requirements.

USE OF PERSONAL DATA

In the past 12 months, we have used Personal Data relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

1. Performing services, including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing, advertising, marketing services, analytic services, or similar services;
2. Establish and process transactions for our products and services including checking accounts, credit cards, loans, investment accounts, as well as additional products for businesses such as commercial financing and payment service, support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications;

3. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
4. Perform accounting, monitoring, and reporting, enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence, enable the use of service providers for business purposes and comply with policies, procedures, and contractual obligations;
5. Auditing related to a current interaction and concurrent transactions, support audit and investigations, legal requests and demands, as well as exercise and defend legal claims;
6. Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business;
7. Debugging to identify and repair errors that impair existing intended functionality;
8. Market, personalize, develop, as well as improve our products and services, conduct research and analysis, including to drive product and services innovation, support customer relationship management, evaluate and engage in mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets and undertaking internal research for technological development and demonstration;
9. Provide benefits to employees and dependents, including healthcare and retirement plans, manage pay and compensation activities, manage and operate our facilities and infrastructure and process employment applications;
10. Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

SALE OF PERSONAL DATA

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

RIGHTS UNDER THE CCPA

The CCPA grants California residents or another person authorized to act on behalf of the consumer the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - a. the categories of Personal Data about you that we collected;
 - b. the categories of sources from which the Personal Data was collected;
 - c. the purpose for collecting Personal Data about you;

- d. the categories of third parties to whom we disclosed Personal Data about you and the categories of Personal Data that was disclosed (if applicable) and the purpose for disclosing the Personal Data about you; and
 - e. the specific pieces of Personal Data we collected about you.
 2. Request we delete Personal Data we collected from you, unless the CCPA recognizes an exception; and
 3. Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Data will require additional information to verify your identity.

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.

In some instances, we may not be able to honor your request. For example, we will not 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. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Data would adversely affect the rights and freedoms of another consumer or where the Personal Data that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of 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.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

HOW TO EXERCISE YOUR RIGHTS

If you are a California resident, you can make a request to know or delete by:

1. If calling within the United States, please call 1-800-263-4826; or
2. Completing and mailing a "California Consumer Privacy Act Request Form" to:

Bank of Guam, San Francisco Branch
404 Montgomery St.
San Francisco, CA 94104

QUESTIONS OR CONCERNS

You may contact us with questions or concerns about this Notice and our practices by:

1. Writing us at: Bank of Guam, San Francisco Branch
404 Montgomery St.
San Francisco, CA 94104
2. Emailing us at: customerservice@bankofguam.com

CHANGES TO THIS CALIFORNIA CONSUMER PRIVACY ACT NOTICE

We may change or update this Notice from time to time. When we do, we will post the revised Notice on our website with a “Last Updated” date.