# California Consumer Privacy Act And California Privacy Rights Act Notice

#### This Notice only applies to California residents.

Maintaining the privacy and security of your personal information is S&T Bank's highest priority. In doing so, we want to provide transparency regarding how and why your data is collected and how it is used. This document, as well as S&T Bank's Privacy Notice set forth how we will interact with your personal information. Specifically, it provides information on how you may exercise your California privacy rights. This Notice is only directed to consumers who reside in the state of California.

It is important to note that <u>S&T Bank does not sell your data</u>. S&T Bank has not and will not disclose or sell any consumer personal information to third parties for a business or commercial purposes. S&T does not sell personal information of minors. Under CPRA, a 'sale' means the transfer of personal information by the business to a third party.

To help ensure transparency around our handling of consumer data, we have an area on our website to help facilitate receiving and processing requests related to accessing and potentially deleting your data. This helps us meet certain legal and compliance requirements such as those under the CPRA and CCPA.

# CCPA and CPRA Privacy Notice

S&T Bank's Privacy Notice provides consumers details about our practices concerning the privacy of consumer data. This Notice provides further information about our practices, along with details concerning how "Consumer Access" ("Right to Know"), "Right to Request Deletion", "Right to Correct", et al requests may be submitted by accessing the web form <a href="here">here</a>. This Notice is designed to provide additional information not covered elsewhere on our site, to ensure compliance with the notice provisions of the CPRA and CCPA.

The following are some general notes about S&T Bank practices related to the collection, use and sharing of consumer data:

As a financial institution, it is necessary for us to collect certain personal information from and/or about consumers in order to provide our products and services, fulfill consumer requests, and to comply with the federal and state laws and other legal obligations. Below is a list of categories of data we may collect from and about our consumers:

- Personal information ("information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household," as defined in the CCPA and CPRA)
- Demographic/Protected class information
- Biometric information (ex: voice recordings when you contact our Customer Solutions Center)

- Commercial information
- Professional or employment-related information
- Education information
- Geolocation (ex: your physical location when using the app and finding the nearest branch)
- Internet or other electronic network activity information
- Audio, electronic, or visual information
- Background/criminal record
- Marketing opt-out/preference information
- Inferences drawn from any of the above information

It is necessary for S&T Bank to share certain client data with affiliates and/or service providers in order to provide our products and services. When engaging such service providers, S&T Bank ensures that such partners will maintain the information in accordance with our privacy and security standards.

#### **Data Retention**

The Bank retains the information it receives about you for a period of up to seven years after account closure unless a shorter or longer period is required in accordance with Bank Policy or California or federal law.

# Your CCPA/CPRA Rights

The CCPA and CPRA provides California residents rights regarding the collections and use of their personal information, subject to certain exceptions. An authorized party may submit requests on your behalf. An authorized agent is a natural person, or a business entity registered with the Secretary of State to conduct business in California, that you have authorized to act on your behalf.

Generally, California residents have the following rights:

**Right to Know** - To request a disclosure of the personal information that has been collected; the categories of sources from which the information was collected; the business or commercial purpose for collecting or selling the personal information; the categories of third parties with which the personal information may be shared; and access to the specific personal information in a portable format.

**Right to Limit Use and Disclosure of Sensitive Personal Information (SPI)** - S&T Bank will only use or disclose your SPI as necessary to perform the services necessary for our consumers. S&T Bank does not use or disclose this information in any other way.

**Right to Correct** – A consumer has the right to correct inaccurate personal information that S&T Bank collects. This information could be the spelling of a name, social security number, date of birth, etc.

**Right to Request Deletion of Personal Information** – To request that a business delete any of the consumer's personal information, subject to certain exceptions provided under the CPRA.

**Right to Opt-Out of Sharing of Personal Information** – S&T Bank will only share information to perform the necessary services for our consumers. Therefore, a consumer cannot opt out of this as we do not share information to a third-party for cross-context behavioral advertising (targeted advertising).

**Right to Opt-out of Automated Decision Making** – Consumers have the right to opt-out of automated decision-making technology.

**Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights** – To not be denied a product of service, charged a different price or rate, or denied a discount or other benefit because the consumer exercised any of their rights under the CCPA or CPRA.

Please note that S&T Bank is taking advantage of the exemption within the CCPA and CPRA for data collected pursuant to the Gramm-Leach-Bliley Act (GLBA). This enables us to best protect the security of our clients when responding to requests. Data provided pursuant to GLBA is often highly sensitive Personal Information, including financial data, that could lead to identity theft should it land in the wrong hands. We will continue to provide access to sensitive financial data only through our established, secure mechanisms to obtain that information such as online or mobile banking or visiting a branch. Therefore, specific pieces of data collected pursuant to GLBA will not be provided through the Consumer Rights Access Request.

A response to your verified request will be sent within 45 days of submission, unless we notify you prior to the end of those 45 days that the delivery date of the response will be extended by an additional 45 days. S&T Bank is not obligated to provide a response more than twice in a 12-month period; this period begins upon your first submission of the verified consumer request.

# **Updates**

This CCPA and CPRA Notice may be revised from time to time, so please review this page periodically. Any changes will become effective when we post the revised notice on the site (please note the effective date listed at the top of this page). If we revise this or other privacy notices in a manner that materially changes our privacy practices, we will provide conspicuous notice on our website and provide direct notice to our clients.

### Contact Us

If you have any questions or comments on this notice or our privacy practices generally, please contact us at (800)325-2265 or visit us at <a href="http://www.stbank.com/privacy/">http://www.stbank.com/privacy/</a>.

Exercise my Rights for California Consumer Privacy Act Online