

# California Consumer Privacy Act Disclosure

Last updated: February 1, 2023

This California Consumer Privacy Act Disclosure (“Disclosure”) applies to California residents.

## Types of information we collect

Bank of the West, a trade name used by BMO Harris Bank N.A., and BancWest Investment Services, Inc., a subsidiary of BMO Harris Bank N.A., (collectively, “the Bank,” “we,” “us,” “our”), may collect the following categories of personal information about individuals in connection with providing banking and other financial products and services:

### Personal or Individual Identifiers

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First, Middle and Last Name, DBA or other alias, postal address, email address, phone numbers, Social Security number or other tax identification number, passport number, driver’s license number, military identification number, bank account number, credit card number, debit card number, signature, internet protocol address.

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### Commercial Information

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Deposit and credit account numbers, assets and liabilities, sources of income, products or services purchased, obtained, or considered, records of transactions, other purchasing or consuming histories or tendencies, records of real property and personal property; other financial information, other sources of income, insurance policy numbers.

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### Professional or Employment-Related Information

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Occupation, employment history, education, titles or positions with government entities, employers, or companies you own, salary or self-employment income.

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## **Characteristics of Protected Classifications**

Age/date of birth, gender, race, color/ethnicity, national origin, military or veteran status.

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## **Internet/Electronic Network Activity**

Information regarding interaction with our internet websites, applications and advertisements (learn more: [Online Privacy Notice](#)).

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## **Biometric and Geolocation Information**

Voice ID, voiceprint, or device location.

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## **Audio, Visual and Similar Information**

Copies of passport, driver's license or other photo IDs; images on building and ATM security cameras; voice message recordings.

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## **Inferences Drawn from Any of the Foregoing**

Certain inferences concerning an individual's preferences and characteristics.

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## **Sensitive Personal Information**

Certain categories of information we may collect are considered "sensitive personal information" ("SPI"). SPI includes any personal information that reveals a consumer's social security number, driver's license number, state ID card number, passport number, account login information, financial account number, debit or credit card number, precise geolocation, an individual's racial or ethnic origin, religious or philosophical beliefs, union membership, genetic information, biometric information, health information, sex life or sexual orientation. We do not share your sensitive personal information as defined under the CCPA.

## **Information Uses**

We may use some or all of the personal information included in any of the categories described above for the following purposes:

- verify your identity;
- provide and manage products and services you have requested;
- understand your financial services requirements;
- report to consumer credit bureaus and business reporting companies;
- protect against fraud and manage risk;
- determine suitability of products and services for you;
- better manage your relationship with us;
- determine your eligibility for certain of our products and services, or products or services of others;
- comply with legal or regulatory requirements, or as otherwise permitted by law;
- communicate with you regarding products and services that may be of interest;
- understand our customers and develop and tailor our products and services; and/or respond to any questions you may have.

## **Retention of Personal Information**

We retain personal information (including sensitive personal information) for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. To determine the appropriate retention period for personal information, we consider different criteria, including the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, the need for maintaining your personal information to provide you with products and services, and all applicable legal requirements.

Please refer to our Policy for additional information on how to exercise your privacy rights under the CCPA.