

California Privacy Rights

Last Updated: January 1, 2020

Introduction

If you are a California user, you have certain rights with respect to the collection, use, transfer, and processing of your “personal information,” as defined by the California Consumer Privacy Act (“CCPA”). We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others. To exercise any of the rights below, please contact us via the contact information below. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information.

What Information Do We Collect?

In the previous 12 months, Bay Equity has collected information from the following categories. Information collected under Gramm Leach Bliley Act (GLBA) or the Fair Credit Reporting Act (FCRA) are exempt from CCPA and can be found in our Privacy Policy posted on www.bayeq.com

Category	Collected
A. Identifiers	YES
B. Personal Information¹	YES
C. Protected Classification Characteristics Under California or Federal Law	NO
D. Commercial Information	NO
E. Biometric Information	NO
F. Internet or Other Similar Network Activity	NO
G. Geolocation Dat.	NO
H. Sensory Data	NO
I. Professional or Employment-Related Information	NO
J. Non-Public Education Information	NO
K. Inferences Drawn of the Consumer	NO

The above examples are illustrative examples from the CCPA and do not reflect the specific pieces of information collected.

¹ Categories of Personal Information are as defined in Cal. Civ. Code. § 1798.80



Personal Information does not include certain statutory exceptions, including, but not limited to, information covered by the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act.

The above does not relate to information collected in connection with an individual's employment by or seeking employment from Bay Equity. If you are employed by or seeking employment from Bay Equity, please see our employee privacy policy for information regarding the personal information we collect in that capacity.

Sources From Which Personal Information Is Collected

Personal information in categories A (identifiers), B (personal), C (protected classifications), and H (sensory data) may be collected from you. The personal information in category D (commercial) may be collected via a log of your transactions. The personal information in categories F (internet and other electronic network activity), G (geolocation), and K (inferences) could be based on your interactions with a company website and mobile apps.

Business or Commercial Purposes for Which Personal Information Is Collected

Your Personal Information is used for the following purposes:

- Respond to your requests for services;
- Provide you with customer support and respond to your communications;
- Send you transactional or administrative communications, as well as certain service-related announcements;
- Personalize your experience on company website or mobile apps;
- Send you information relating to other programs, services, or products that may be of interest to you; and/or
- Run website analytics to evaluate performance.

Third Parties With Whom Personal Information Is Shared

Bay Equity may share your Personal Information with analytics and service providers, benefits providers, transaction processors, and law enforcement (if necessary).

In the preceding 12 months, we have disclosed the following Personal Information about consumers for business purposes:

- We share content posted on our social media platforms (e.g., if a consumer "comments" on a story) with other consumers.

- The information we automatically collect or store is used to improve the content of our web services and to help us understand how people are using our services. This information does not identify you personally and is used for gathering web site statistics.

In the preceding 12 months, we have not sold Personal Information about minors.

In the preceding 12 months, we have not sold any Personal Information about consumers.

Individual Rights

a. **Right to Know About Personal Information Collected, Disclosed, or Sold**

You have the right to request that Bay Equity disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Rights to Know requests that you can make:

- 1. Right to Know (Abbreviated Request):** If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
 - a. Categories of Personal Information collected;
 - b. Categories of sources from which Personal Information is collected;
 - c. Business purpose for collecting or selling; and
 - d. Categories of third parties with whom sold.
- 2. Right to Know (Specific Pieces of Information Request):** If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
 - a. Specific pieces of Personal Information collected about you.

This information will be provided to you free of charge, unless Bay Equity determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

There are certain exceptions to a consumer's Right to Know. Bay Equity will state in its response if an exception applies.

b. **Right of Deletion**

You have the right to request that Bay Equity and our service providers delete any Personal Information about yourself which Bay Equity has collected under CCPA from you upon receipt

of a verifiable request. This right is subject to certain exceptions. Bay Equity will state in its response if an exception applies.

c. Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your Personal Information by a business subject to certain laws and regulations.

Bay Equity does not sell any Personal information of California consumers. Bay Equity will update this Privacy Policy and comply with applicable laws and regulations in the event that it sells Personal Information of California consumers in the future.

d. Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. Bay Equity will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

e. Submitting Requests

You can submit your request by calling us at 800-BAY-EQ03 or visiting our company website at www.bayeq.com. You may also submit a request via email at customercare@bayeq.com.

f. Verifying Requests

Bay Equity provides California consumers with an online webform by selecting “**Get in Touch**” and choosing Customer Care to submit requests. The webform is accessible at www.bayeq.com. As stated in the webform, Bay Equity must verify that the person requesting information or deletion is the California consumer about whom the request relates in order to process the request. To verify a California consumer’s identity, we may request up to three pieces of Personal Information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. Bay Equity reserves the right to take additional steps as necessary to verify the identity of California consumers where we have reason to believe a request is fraudulent.

g. Authorized Agents



You may choose a person registered with the California Secretary of State that you authorize to act on your behalf to submit your requests (“Authorized Agent”). If you choose to use an Authorized Agent, Bay Equity requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with Bay Equity. Failure to do so may result in Bay Equity denying your request.

Contact for More Information

If you have any questions or concerns regarding your California Privacy Rights under this Privacy Policy, you may contact us in the following ways:

Bay Equity, LLC
Attn: Customer Care
770 Tamalpais Drive, Suite 207
Corte Madera, CA 94925
customer care@bayeq.com
800-BAY-3703