

Data Privacy Policy for Staff and Customers (California)

1. Introduction

[Financial Institution Name] ("we," "us," or "our") is committed to protecting the privacy and security of your personal information, as defined by the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA). This Data Privacy Policy ("Policy") explains how we collect, use, disclose, and retain your personal information, as well as your rights as a California resident, for staff and customers located in California.

2. Categories of Personal Information We Collect

We may collect and process various categories of personal information about you depending on your relationship with us, including:

- **For Staff:** Name, contact information, employment details, education and professional qualifications, performance data, and other information relevant to your employment, as permitted by law.
- **For Customers:** Name, contact information, identification documents, financial information, transaction data, account details, and information related to your interactions with us.

3. Purposes of Data Use

We use your personal information for legitimate business purposes, which may include:

- **For Staff:** Processing payroll, managing performance, providing training and development opportunities, maintaining health and safety records, and fulfilling legal and regulatory obligations.
- **For Customers:** Providing and managing financial products and services, processing transactions, conducting know-your-customer (KYC) checks, preventing fraud and money laundering, complying with legal and regulatory requirements, sending marketing communications (with your consent), and other purposes disclosed at the time of collection.

4. Your California Privacy Rights

As a California resident, you have the following rights under the CCPA and CPRA:

- **Right to Know:** You have the right to request that we disclose the categories and specific pieces of personal information we have collected about you, the purposes for which we use your information, and the categories of third parties with whom we share your information.
- **Right to Delete:** You have the right to request that we delete the personal information we have collected about you, subject to certain exceptions.

- **Right to Opt-Out of the Sale of Personal Information:** We do not sell your personal information as defined by the CCPA, but you have the right to request that we not share your personal information for certain business purposes.
- **Right to Non-Discrimination:** You cannot be discriminated against for exercising any of your California privacy rights.

5. How to Exercise Your California Privacy Rights

You can exercise your California privacy rights by submitting a request through our dedicated web portal at [link to web portal] or by contacting us at [phone number] or [email address].

6. Data Sharing and Transfers

We may share your personal information with third-party service providers who assist us in providing our services or complying with legal obligations. These third parties are contractually obligated to protect your information in accordance with this Policy and applicable law.

We will not transfer your personal information outside of the United States without your consent, except as required by law.

7. Data Retention

We will retain your personal information for as long as it is necessary to fulfill the purposes for which it was collected, and in accordance with applicable legal and regulatory requirements.

8. Data Security

We have implemented appropriate technical and organizational measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction.

9. Changes to this Policy

We may update this Policy from time to time to reflect changes in applicable law, our practices, or for other legitimate reasons. We will notify you of any changes by posting the revised Policy on our website.

10. Contact Us

If you have any questions regarding this Policy, please contact our Data Protection Officer (DPO) at [DPO email address or other contact information].

Additional Information:

- We encourage you to visit the website of the California Office of the Attorney General (<https://oag.ca.gov/>) for further information about your rights under the CCPA and CPRA.

- This Policy is provided in addition to, and does not supersede, any other legal agreements you may have with us.

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