

California Personal Information Point of Collection Notice (“Notice”)

Last Updated: February 6, 2024

Zions Bancorporation, N.A., and its affiliates (“Bank,” we, our, or us) provides this Notice pursuant to the California Consumer Privacy Act (“CCPA”). This Notice supplements our [Digital Privacy Statement](#).

Categories of Personal Information that We Collect & Why We Collect It

We collect Personal Information to provide individual and commercial financial products and services, as well as for our employment and human resource purposes. “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

We have collected or may collect the following categories of Personal Information about you. The specific pieces of Personal Information we collected about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

Category	Example	Purpose for Collection
Personal Identifiers	Full name, alias, date of birth, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, state identification number, citizenship, and immigration status.	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Personal Records (As defined in Cal. Civ. Code §1798.80(e))	Signature, physical characteristics or description, address, telephone number, insurance policy number, education, employment, employment history, bank account number, credit or debit card number, other financial information, medical information, health insurance information	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Characteristics of Protected Classes	Characteristics of protected classes or groups under state or federal law, such as sex or marital status	<ul style="list-style-type: none"> ▪ Performing services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Purchase Information	Including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Biometric Information	Biometric information, such as fingerprints and voiceprints	<ul style="list-style-type: none"> ▪ Performing services ▪ Security/Fraud
Internet or Online Information	Information regarding interactions with our website, computer systems, and/or devices	<ul style="list-style-type: none"> ▪ Communicating with you ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ Debugging

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		<ul style="list-style-type: none"> ▪ To comply with our legal obligations
Geolocation Data	Geolocation data (ex: device location, your IP address when visiting our website or your physical location when using a Bank ATM)	<ul style="list-style-type: none"> ▪ Performing services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ Debugging ▪ To comply with our legal obligations
Audio and Visual Information	Audio, electronic, visual, or olfactory information (ex: voice recordings when you contact a call center)	<ul style="list-style-type: none"> ▪ Performing services ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Employment Information	Work history and prior employer information	<ul style="list-style-type: none"> ▪ Performing Services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ To comply with our legal obligations
Education Information	School information	<ul style="list-style-type: none"> ▪ Performing services
Inferences	Inferences based on information about an individual to create a summary about, for example, an individual’s preferences and characteristics	<ul style="list-style-type: none"> ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud

Sources of Personal Information

We may collect your Personal Information directly from you when you provide us information online, through electronic forms, over the phone, or through paper documents; automatically through our website via cookies and other tracking technologies; from our service providers, vendors and suppliers, affiliates, or other individuals and businesses; from third-party sources, such as data providers; and from public sources of data, such as government databases. More detail on the ways in which we collect Personal Information can be found in our [Digital Privacy Statement](#).

Disclosures of Personal Information

We do not sell Personal Information for money. However, our use of tracking technologies may be considered a “sale” under California law. We share Personal Information with our Service Providers for the business purposes listed in the chart above. The categories of Personal Information we share for a business purpose are:

1. Personal Identifiers
2. Personal Records (As defined in Cal. Civ. Code §1798.80(e))
3. Characteristics of Protected Classes
4. Purchase Information
5. Biometric Information
6. Internet or Online Information
7. Geolocation Data
8. Audio and Visual Information

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9. Employment Information
10. Education Information
11. Inferences

The categories of persons to which we disclosed this Personal Information include affiliated and related companies, service providers, professional advisors, public authorities/government bodies, and external auditors.

We may also share the following categories of Personal Information with advertising or analytics providers, including for cross-context behavioral advertising:

1. Personal Identifiers
2. Personal Records (As defined in Cal. Civ. Code §1798.80(e))
3. Purchase Information
4. Internet or Online Information
5. Geolocation Data
6. Inferences

Categories of personal information disclosed that may be considered “sale” or “sharing” under California law: Basic Identifying Information, Device Information and Other Unique Identifiers, Internet or Other Network Activity, Geolocation Data, and Commercial Data.

Categories of third parties to whom personal information was disclosed that may be considered “sale” or “sharing” under California law: advertisers and marketing partners, data analytics providers, and social media networks.

More information on how we share Personal Information can be found in our [Digital Privacy Statement](#).

CCPA Rights

Under the CCPA, California consumers have certain rights which they may exercise independently or through an authorized agent. Please note that when submitting a request, you may be asked to provide information to verify your identity before action is taken. You may designate an authorized agent to make the requests on your behalf. An authorized agent must submit proof to us that he or she has been authorized by you to act on your behalf, and you will still need to verify your identity directly with us before we can process the request.

To submit a request, use our portal <https://datarights.zionsbancorp.com/>, or call us at 855-210-9448.

California Residents have the Right to:

California residents have privacy rights provided by the California Consumer Privacy Act (CCPA), as it may be amended from time to time. These include:

1. Right to Know What Personal Information is Being Collected about you, including the sources from which the personal information is collected including the business or commercial purpose, and the third parties to whom the business discloses personal information in a machine-readable format if available;
2. Right to Delete Personal Information, if applicable;
3. Right to Know What Personal Information is Sold or Shared and to Whom;
4. Right to Opt-Out of Sale or Sharing of Personal Information, if applicable;
5. Right of No Retaliation Following Opt-Out or Exercise of Other Rights;
6. Right to Correct Inaccurate Personal Information; and

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7. Right to Limit Use and Disclosure of Sensitive Personal Information, if applicable.

How long do we Retain Personal Information?

We store personal information of our customers and employees as required to meet our legal and business obligations for the life of their relationship with us plus 7 years. We may store the personal information of other consumers for the purpose of identifying potential clients or developing new client relationships for up to 3 years from the date it was collected.

Contact Us

If you would like more information about our privacy practices, please visit us at <https://datarights.zionsbancorp.com/> or call us at 855-210-9448 and we will be happy to assist you further.