

Metropolitan Commercial Bank California Consumer Privacy Act Privacy Policy and Notice

Last Updated: December 22, 2025

This California Consumer Privacy Act Privacy Policy and Notice (“Notice”) applies only to California residents (“California residents,” “you,” or “your”) covered by the California Consumer Privacy Act, (as amended from time to time, “CCPA”). This Notice explains what personal information Metropolitan Commercial Bank (“we,” “us,” or “our”) collects related to California residents, and the sources of such personal information; how we use such personal information; to whom we disclose such personal information; how long we keep such personal information; and the rights that California residents may have, and how to exercise such rights. This Notice serves as our notice at collection and our privacy policy pursuant to the CCPA.

Under the CCPA, “personal information” is any information that identifies, relates to, or could reasonably be linked to you or your household. The specific personal information that we collect, use, and disclose relating to you will vary based on the relationship or interaction that you have with us and your use of our website. In addition, the personal information that we collect, use, and disclose may be subject to other privacy laws other than the CCPA, such as the Gramm-Leach Bliley Act, and as such, the CCPA does not apply to such personal information covered by such other privacy laws. For more information about how we collect, use, and disclose such other covered information, please refer to <https://mcbankny.com/privacy-policy>.

CATEGORIES OF PERSONAL INFORMATION

In the past 12 months, we may have collected personal information in the following categories:

- **Personal Identifiers (including those listed in other California statutes):** Personal identifiers, such as real name, alias, postal address, Internet Protocol address, online identifier, email address, social security number, driver’s license number, passport number, or other similar identifiers
- **Financial Information:** Financial information, such as bank account numbers, debit/credit card numbers, transaction details, and any other financial information

- **Characteristics of Protected Classifications:** Characteristics of protected classes or groups *under California or federal law*, such as date of birth, age, race, color, religion, national origin, gender, marital status, citizenship, request for family care leave, request for leave for employee's own serious health condition, and request for pregnancy leave
- **Commercial Information:** Commercial information, such as records of personal property; products and services purchased, obtained or considered; and purchasing or consuming histories or tendencies
- **Biometric Information:** Biometric information, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint or a voiceprint, can be extracted, keystroke patterns or rhythms, and gait patterns or rhythms
- **Internet or Other Electronic Network Activity Information:** Internet or other electronic network activity Information, such as browsing history, search history, and information regarding your interaction with a website, application, advertisement
- **Geolocation Data:** Information used to identify your physical location, such as Internet Protocol location or device location
- **Communications, Recordings, Images:** Audio, electronic, visual, thermal, olfactory, or similar information
- **Professional or Employment Information:** Professional or employment-related information such as work history and prior employers
- **Education Information:** Information related to your education and qualifications, such as schools attended and dates of attendance
- **Inferences:** Any derivation of information, data, assumptions, or conclusions drawn from certain of the above categories used to create a profile about you, such as a profile reflecting your preferences, characteristics, behavior, attitude, intelligence, abilities, and aptitude
- **Sensitive Personal Information:** Information, such as government-issued identifiers (such as social security number, passport number, driver's license); account log-in, financial account, debit or credit card number with any required security code, password, or credentials allowing access to an account; precise geolocation; information concerning health or sexual orientation; information concerning racial or ethnic origin, religious or philosophical beliefs, union

membership; and biometric data processed to identify an individual, contents of mail/email/texts

CATEGORIES OF SOURCES OF PERSONAL INFORMATION

In the past 12 months, we may have collected personal information listed above about California residents from the following categories of sources:

- Directly from you or your representative, when you or your representative provides such personal information to us digitally or physically (e.g., where you contact us via email or telephone, or by any other means)
- Our affiliates (if applicable)
- Public records or widely available sources, including information from the media, and information that is made available by federal, state, and local government entities
- Service providers, consumer data resellers, credit reporting agencies and other similar persons or entities
- Your devices when interacting with our websites, online banking portals, and mobile apps (such as website/mobile app activity)
- Corporate clients providing information about individuals associated with the corporate client (such as an employer providing information about one of its employees)

PURPOSES FOR COLLECTING PERSONAL INFORMATION

We collect, use, and disclose personal information for the following business purposes:

- Performing services for you, including opening, servicing, and maintaining accounts, providing customer service, processing or fulfilling transactions, verifying your information, processing payments, or providing financing
- Detecting security incidents; protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible for such activity
- Complying with laws, regulations, legal process, law enforcement requirements, and internal policies, including for purposes of auditing, accounting, internal investigations, and legal processes
- Helping to ensure the security and integrity of systems and data

- Conducting analytics and improving online banking and mobile app performance

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

In the past 12 months, we may have shared the following list of categories of personal information with third parties for our business purposes:

- Identifiers such as a real name, postal address, social security number, driver's license number, passport number, or other similar identifiers
- Personal information, such as bank account number, debit card number, or any other financial information
- Characteristics of protected classifications under California or federal law, such as race, color or gender
- Commercial information, such as records of personal property or products or services purchased, obtained, or considered
- Biometric information
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with our internet website
- Geolocation data, such as Internet Protocol (IP) location
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information, such as employment history
- Education information, such as schools attended and dates of attendance
- Inferences drawn from any of the information identified above to create a profile about you, such as your preferences and characteristics

In the past 12 months, we may have disclosed the categories of personal information described above for our business purposes to some or all of the following categories of third parties:

- You and, where appropriate, your family, your associates and your representatives
- Our affiliates (if applicable)
- Anti-fraud service providers

- Service providers and third parties to provide products and services to you, such as account transactions and maintenance, and online and mobile banking services
- Identity verification services, such as to verify your identity
- Government, legal, regulatory, or other similar authorities and/or local government agencies, upon request or where required by laws and regulations

RETENTION OF PERSONAL INFORMATION

The length of time that we retain each category of personal information will depend on a number of criteria, including: (i) the length of time that we are required to retain personal information to accomplish the purposes for which we collected, used, or disclosed such personal information as indicated in this Notice; (ii) the length of time we are required to retain personal information to comply with applicable federal and state laws and regulations; (iii) whether the personal information is relevant to a dispute, investigation, or legal hold; and (iv) whether you choose to exercise your right, subject to certain exceptions and other limitations, to request deletion of your personal information.

RIGHTS OF CALIFORNIA RESIDENTS

As a California resident, you may have one or more of the following rights under the CCPA, including the right to receive this Notice at or before the point of collection of your personal information:

Right to Know: You have the right to request that we disclose to you free of charge the following information covering the 12 months preceding your request:

- The categories of personal information we have collected about you;
- The categories of sources from which personal information is collected;
- The business or commercial purpose for collecting personal information about you;
- The purpose for sharing personal information about you;
- The categories of third parties to whom we disclosed personal information about you and the categories of personal information that were disclosed (if applicable) and the purpose for disclosing the personal information about you;
- The categories of personal information (including sensitive personal information) about you that we shared and the categories of third parties to which we shared such personal information and/or sensitive personal information; and

- The specific pieces of personal information we have collected about you.

Right to Delete: You have the right to request that we delete any personal information that we have collected from you.

Right to Correct: You have the right to request that we correct inaccurate personal information that we have about you.

Right to Opt-Out of Sale/Sharing: You have the right to opt out of the sale or sharing of your personal information.

These rights are subject to exceptions and other limitations. For example, we are not required to comply with a request to delete personal information if the personal information is necessary for us to complete a transaction for which the information was collected, or if we must retain the personal information to comply with a legal obligation. In addition, if we receive one of the above requests that involves personal information subject to another privacy law, we may deny part or all of your request relating to such personal information as such personal information is exempt from the CCPA. We will inform you of an exemption in response to your request.

HOW TO SUBMIT REQUESTS

California residents may exercise one or more of their rights described in this Notice, subject to exceptions and other limitations. To exercise one or more of your rights, you or your authorized agent (on your behalf) may make a request by:

1. Calling us at 800-852-7632 (toll-free);
2. Submitting a request at: <https://www.mcbankny.com/ccpa-request>; or
3. Sending an email to: ccparequest@mcbankny.com

When we receive a request from you, we will verify your identity to confirm the personal information we maintain relates to you. We may request information from you, not limited to your name, address, and contact information, to verify your identity. We may use a two-step process for online requests to delete personal information where you must first submit a request to delete and then second, we will separately confirm you want your personal information deleted. If you submit a request on behalf of another individual, we may require proof that you are authorized to submit such a request on behalf of that individual.

Right to Non-Discrimination: You have the right not to be discriminated against for exercising your rights under the CCPA. We will not discriminate against you for exercising any of your rights.

SALE OF PERSONAL INFORMATION

We do not offer an opt-out from the sale of personal information because we do not sell personal information as defined by the CCPA, and we have not sold such information within the last 12 months.

SALE OR SHARING OF PERSONAL INFORMATION OF PERSONS UNDER 16 YEARS OF AGE

We do not knowingly sell or share personal information of minors under the age of 16. As such, we do not have actual knowledge that we sold or shared personal information of minors under the age of 16 within the past 12 months.

USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION

We do not provide a right to limit our use or disclosure of sensitive personal information because we do not use or disclose sensitive personal information in such a manner as to require the provision of such right (such as using sensitive personal information for purposes of inferring characteristics about an individual).

CONTACT FOR MORE INFORMATION

You may contact us with any questions or concerns that you may have about our privacy policies and practices or this Notice by sending an email to: ccparequest@mcbankny.com.

CHANGES TO THIS NOTICE

We may change this Notice from time to time. When we do, we will post the updated Notice on our website with the new “Last Updated” date. The updated Notice will become effective when posted, unless otherwise indicated.