

## **BHI PRIVACY POLICY FOR CALIFORNIA RESIDENTS**

This Privacy Policy for California residents (the “Policy”) is provided by Bank Hapoalim B.M.’s New York Branch and its Representative Offices in the United States (collectively, “BHI,” “us,” or “we”) pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), as amended. The Policy applies to visitors, users, and others who reside in the State of California (“consumers” or “you”). Any terms used in this Policy that are not otherwise defined have the meaning ascribed to them in the CCPA.

The Policy supplements BHI’s [Online Privacy Policy](#), and explains how BHI collects, uses, and discloses personal information relating to California residents. It also explains the rights of California residents under the CCPA, including: (1) the right to request personal information that we have collected about you during the past 12 months (the “Right to Know”), and (2) the right to request that we delete certain personal information that we have collected about you (the “Right to Delete.”).

Under the CCPA, “personal information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. This information is referred to in this Policy as “Personal Information.” As amended, the CCPA also defines additional categories of “Sensitive Personal Information.”

Please note that the CCPA does not apply to certain categories of information, such as personal information that is collected, processed, or disclosed pursuant to the Gramm-Leach-Bliley Act. Accordingly, this Policy does not apply to information we collect about California residents who are using our financial products and services for personal, family, or household purposes.

### **Personal Information we collect**

We have collected and disclosed to third parties for business purposes the following categories of Personal Information relating to California residents in the past 12 months. The table also lists our expected retention period for each category of Personal Information collected:

| <b>Category of Personal Information</b>  | <b>Examples</b>  | <b>Collected</b> | <b>Retention Period<sup>1</sup></b> |
|--|--|------------------|-------------------------------------|
| A. Identifiers   | Real name or alias; address; Social Security number; passport number; other government issued number; Green Card number; driving license number; telephone number; device identifier; pixel tags; email address; IP address; other similar identifiers | Yes              | 7 years                             |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) | Personal information as defined in the California safeguards law, such as employment information, financial information, or health information   | Yes              | 7 years                             |
| C. Protected classification characteristics under California or federal law  | Protected classification status including gender, ethnicity, marital status, national origin, veteran or military status, and others   | Yes              | 7 years                             |

<sup>1</sup> Due to ongoing legal and regulatory obligations, certain BHI records, including some which may fall into the categories listed in this Policy, must be retained for time periods exceeding the stated retention period.

|   |   |     |                |
|---|---|-----|----------------|
| D. Commercial information   | Information on purchases of products or services; purchasing histories or tendencies  | Yes | 7 years        |
| E. Biometric information  | Fingerprints; faceprints; voiceprints; keystroke patterns   | No  | Not Applicable |
| F. Internet or other similar network activity   | Internet browsing history; search history; data generated by your interaction with our website, application, or advertisement   | No  | Not Applicable |
| G. Geolocation data   | Device location; any information used to identify your physical location  | No  | Not Applicable |
| H. Sensory data   | Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recordings  | No  | Not Applicable |
| I. Professional or employment-related information   | Work and employment history; salary; references   | Yes | 7 years        |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | School or student records   | No  | Not Applicable |
| K. Inferences drawn from other personal information   | Inferences or conclusions drawn from any of the above categories to create a profile reflecting your preferences such as characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, aptitudes | No  | Not Applicable |

We have collected the follow categories of Sensitive Personal Information of California residents in the past 12 months. BHI does not use or disclose Sensitive Personal Information for reasons other than the reasons specified in the California Code of Regulations, Title 11, Section 7027(m). The table also lists our expected retention period for each category of Sensitive Personal Information collected:

| Category of Sensitive Personal Information | Examples   | Collected | Retention Period <sup>2</sup> |
|--|--|-----------|-------------------------------|
| A. Government issued identifiers           | Consumer's social security number; driver's license; state identification card; passport number  | Yes       | 7 years                       |
| B. Complete account access credentials     | Consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account | No        | Not Applicable                |
| C. Precise geolocation                     | Consumer's precise geolocation   | No        | Not Applicable                |
| D. Origin, beliefs, affiliations           | Consumer's racial or ethnic origin; religious or philosophical beliefs; union membership   | No        | Not Applicable                |
| E. Communication content                   | Contents of a consumer's mail, email, and text messages  | No        | Not Applicable                |
| F. Genetic data                            | Consumer's genetic data  | No        | Not Applicable                |

**Sources from which we collect Personal Information**

We obtain the Personal Information from one or more of the following sources:

- From you or your representatives directly, e.g., where you contact us via email or telephone, or by any other means and provide Personal Information to us;
- From publicly available information, e.g., federal, state, or local records; publicly available media; and
- From third parties who provide it to us, e.g., companies or organizations that provide data to support our services to you, or support our human resource and workforce management, or who otherwise support our operations.

**Disclosure of Personal Information for Business Purposes**

---

<sup>2</sup> Due to ongoing legal and regulatory obligations, certain BHI records, including some which may fall into the categories listed in this Policy, must be retained for time periods exceeding the stated retention period.

The categories of third parties to which we have disclosed Personal Information for our business purposes described in this privacy Policy are:

- Our affiliates;
- Our service providers and vendors;
- Third parties, where you have authorized us, directly or indirectly, to disclose your Personal Information;
- Government or regulatory authorities, or as otherwise required by law or legal process.

### **How we use Personal Information**

We have and may use Personal Information relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- To communicate with you, including to provide products or services requested or ordered by you, such as processing of transactions, purchases, and payments;
- To respond to, investigate, and follow up on requests for information or other inquiries from you via any means;
- To set up, secure, maintain, and service your account with us, update your contact information, or verify your identity and information related to your account;
- For testing, analysis, and product development to improve the functioning or security of our Website, products, and services;
- To perform audit, compliance, or other risk management functions, or to detect, prevent, and investigate fraud;
- To perform health and safety assessments and comply with related legal obligations;
- To respond to requests from law enforcement or other legal process as required by applicable law, court order, or applicable regulations.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing notice to you.

### **Sale and sharing of Personal Information**

We do not offer an opt-out from the sale of Personal Information or Sensitive Personal Information because BHI have not “sold” Personal Information or Sensitive Personal Information, including the Personal Information or Sensitive Personal Information of minors under the age of 16, in the past 12 months, and do not “sell” Personal Information or Sensitive Personal Information. The “sale” of Personal Information or Sensitive Personal Information is defined in the CCPA as the disclosure of Personal Information for monetary or other valuable consideration. We will also not share your Personal Information or Sensitive Personal Information with third parties for cross-context behavioural advertising.

### **Your rights under the CCPA**

If you are a California resident, you may have certain rights under the CCPA, as amended, including the following rights (collectively, “Requests”):

1. The right to request that we disclose to you the following information for the period of 12 months preceding the date of your request. This is known as the “Right to Know Request.” Your Right to Know Request may cover the following information:
  - the categories of Personal Information about you that we collected;
  - the categories of sources from which the Personal Information was collected;

- the purpose for collecting Personal Information about you;
  - the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
  - the specific pieces of Personal Information we collected about you;
2. The right to request that we delete Personal Information we collected from you, unless an exception under the CCPA applies. This is known as the “Right to Delete Request.” BHI generally collects only the Personal Information that is required for us to meet legal and regulatory requirements and service and maintain your account. As a result, we may not be able to delete information due to a legal or operational need to retain it.
  3. The right to correct any inaccurate Personal Information that we may have collected about you.

You have the additional right to be free from unlawful discrimination in exercising the above rights under the CCPA.

### **How to Make a Request**

If you are a California resident, you may submit a Request by the following two methods:

1. Call 212-782-2000 and ask to speak to Customer Care; or
2. Submit your request via email to: [CustomerCare@bhiusa.com](mailto:CustomerCare@bhiusa.com)

You, or a person that you authorize to act on your behalf, may make a Request related to your Personal Information twice within any 12-month period.

When making a request, you will be required to verify your identity, and/or to verify the identity of your authorized representative making the Request on your behalf using the Identifiers and Government Issued Identifiers you have previously provided to us.

We will acknowledge receipt of your Request and advise you how long we expect it will take to respond if we are able to verify your identity. We cannot respond to your Request or provide you with Personal Information if we cannot verify your identity or confirm that the Personal Information requested relates to you. You are not required to create an account with BHI to submit a Request.

We will advise you in our response if we are not able to process your Request. We will not process your Request where an exception to the Right to Know or Right to Delete applies under the CCPA, as amended.

If you have questions or concerns about BHI’s privacy policies and practices, you may contact us at 212-782-2000 or [CustomerCare@bhiusa.com](mailto:CustomerCare@bhiusa.com).

### **Changes to this Policy**

This policy was last updated on May 24, 2023. BHI may make changes or otherwise update this Policy. When we do, we will post the revised Policy on this page and indicate the date of the change or update.