



Privacy Policy

Last Updated: January 1, 2020

I. Introduction

This Privacy Policy (this "**Policy**") describes the policies and practices of Mizrahi Tefahot Bank Ltd., Los Angeles Branch ("**UMTB-LA**" or "**we**" or "**us**") with respect to our collection, use and sharing of personally identifiable information ("PII"). For purposes of this Policy, PII about you means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We may change the terms of the Policy from time to time. When we make changes, we will post the amended policy on this website, <https://www.umtbusa.com/>, and any other Site that links to this Policy (the "Sites"). If the changes are material, we will post a notice on the Sites alerting you to the change. Any changes to the Policy will become effective immediately upon our posting of the Policy, so please be sure to review the current Policy before providing us with PII.

If you are, or apply to become, a customer of UMTB-LA with respect to products or services to be used primarily for personal, family, or household purposes, you have separate privacy rights, as reflected in our customer privacy notice, available at: <https://www.umtbusa.com/FinancialPrivacy.pdf>.

II. How Does UMTB-LA Collect Your PII and What Types of PII Does It Collect?

UMTB-LA collects PII about you when you provide it to us, such as by completing a form we offer, sending us an email, or responding to a request for information. We also may collect PII about you from the following sources: our affiliates; the Internet, including social media websites and other websites; credit reporting agencies; and other persons and organizations as permitted under applicable law.

Not all information that we collect from you is PII. We may collect information about you that we cannot use to identify you specifically. Listed below are the types of information about you that we may have collected within the past 12 months. These types of information are PII only if the information identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device.

- **Identifiers** such as: your name, postal address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

- **“Customer Records” information** (some of which may be identifiers or professional/employment-related information as well), such as your name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- **Commercial information**, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Professional or employment-related information**, such as your current or past job history.
- **Personal characteristics** that are related to classifications legally protected from discrimination, such as race, national origin, ethnicity, marital status, age and gender.
- **Inferences drawn from other PII**, such as a summary we might make based on your apparent personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

III. **Our Business Purposes for Collecting PII; How We Use the Information**

We may use the PII we collect from you for a variety of purposes permitted by law, including:

- To provide you with information about our products and services, and to provide you with our products and services, including to service loans we make to you;
- To communicate with you, including in response to your inquiries and to fulfill your requests, and to inform you of changes to terms and conditions relating to the products you receive from us or the UMTB-LA services in which you are enrolled;
- To allow you to apply for our products and services and to evaluate your eligibility for such products or services, including your creditworthiness;
- To personalize our services for you by presenting UMTB-LA products and offers tailored to you;
- To prevent fraud, including by confirming your identity and/or location (for example, we may use your device's physical location for fraud prevention purposes, if you are conducting a transaction);

- To maintain and upgrade the security of the services and any data or information collected;
- For legal, compliance and risk management purposes; and
- For other legally permissible or everyday business purposes, including data analysis and product development.

IV. When and With Whom We Share PII

We may share the PII we collect as follows:

- With our service providers, whom we engage to deliver services to you on our behalf, such as bill payment, money transfers, check processing, wiring services and payment solutions, and to assist us with technology support, operational support and other forms of assistance;
- To our affiliated entities within the Mizrahi Tefahot Bank family, for legally permissible purposes;
- In the event of a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of UMTB-LA or its assets, to the proposed or actual acquiring party or assignee;
- As we believe to be appropriate: (i) when required by applicable law, including laws outside your country of residence; (ii) to comply with legal process (iii) to respond to requests from public and government authorities; (iv) to enforce the terms and conditions for use of the Sites, including this Policy; (v) to protect and defend our rights and property; (vi) to protect the interests of UMTB-LA or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain. We have no obligation to notify you of such disclosures, except as required by applicable law.

We do not sell PII and we do not share PII with non-affiliated entities for them to use for their own marketing purposes.

V. California Residents' Privacy Rights

If you are a resident of California, you have certain privacy rights under the California Consumer Privacy Act ("CCPA"). We honor those rights, as described below, and we are prohibited by law from discriminating against you for exercising any of those rights.

A. Right to Know

Subject to the exemptions mentioned below in part (C) below, if you are a California resident, you have the right to know what PII we have collected about you, why we collected it, and the categories of third parties (excluding service providers) with whom we have shared the PII during the past 12 months. (See below on “How to Submit a Request.”) You may request that we provide a description of the categories of PII we have collected (a “Categories Request”) or a request for access to the specific pieces of PII we have collected (a “Specific Pieces Request.”)

If you make a Categories Request, and you do not have any type of account with us, we will need you to provide us with at least two data elements specific to you, such as your cell phone number or mother’s maiden name (depending on the data elements we already maintain about you), so that we can verify your identity. After we confirm that your request is a verifiable consumer request, we will disclose to you:

- The categories of PII we collected about you.
- The categories of sources for the PII we collected about you (e.g., social media websites, government records available to the public, etc.).
- Our business or commercial purpose for collecting that PII.
- The categories of third parties other than service providers (if any) with whom we shared the PII.

If you make a Specific Pieces Request, we need to be sure we have verified your identity with great certainty to safeguard your privacy. In order to verify your identity, if you do not have any type of account with us, you will need to provide us at least three data elements specific to you, together with a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. After we confirm that your request is a verifiable consumer request, we will disclose to you:

- The specific pieces of PII we collected about you that you requested.

B. Right to Request Deletion

You have the right to request that we delete any of your PII that we collected from you and retained, other than Personal Customer Information (as defined above). We are not obligated to comply with your request if we have a legal basis to retain the PII. If you make a request for us to delete PII, and you do not have any type of account with us, we may need you to provide us with at least two data elements specific to you so that we can verify your identity. Once we receive and confirm that your request is a verifiable consumer request (see below on “How to Submit a Request”), we will inform you whether we have deleted (and have directed our service providers to delete) your PII from our records, or whether we are declining to grant your request to delete due to an exception to the CCPA deletion requirements.

C. Exemptions

Certain PII is protected by federal and state privacy law other than the CCPA and thus the specific rights described above do not apply in the case of that PII. Specifically:

- If you are, or apply to become, a customer of UMTB-LA with respect to products or services to be used primarily for personal, family, or household purposes, the non-public PII we obtain from you in that context (“Personal Customer Information”) is protected under other state and federal law rather than the CCPA. As noted, the rights of such customers of UMTB-LA are set forth in our customer privacy notice, available at: <https://www.umtbusa.com/FinancialPrivacy.pdf>.
- If you are working for or applying for a job with UMTB-LA, or if you are an employee or other representative of a business or other organization that is exploring or engaging in a business-to-business transaction with UMTB-LA, the CCPA currently does not provide you with a “right to know” or “right to request deletion” until January 1, 2021.

D. How to Submit a Request

To request access to or deletion of your PII as described above, please submit a verifiable consumer request to us by:

- Calling us at our toll-free number: 833-MIZRAHI or 833-649-7244
- Sending your request to:

Mizrahi Tefahot Bank Ltd.
Attn.: Privacy Officer
Los Angeles Branch
800 Wilshire Boulevard, Suite 1410
Los Angeles, CA 90017

- Submitting the request as directed at <https://www.umtbusa.com>.

You may make a request on your own behalf, and if you are the parent or guardian of a minor child, you also may make a request related to your child’s PII. If you wish to designate an authorized agent to make a request on your behalf, please provide us with a signed declaration stating that your intent is to permit that individual to act on your behalf and include such individual’s full name, address, email address, and phone number. That way we will be sure you have fully authorized us to act in accordance with the requests of that individual.

In order to protect your PII from unauthorized disclosure or deletion at the request of someone other than you or your legal representative, UMTB-LA requires

identification verification before granting any request to provide copies of, know more about, or delete your PII. Specifically, we require that any request submitted to us:

- Provides sufficient information to allow us to reasonably verify you are the person about whom we collected PII or an authorized representative.
- Describes your request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with PII if we cannot verify your identity or authority to make the request and confirm that the PII relates to you.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing. We will only use PII provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

VI. Security

To help prevent unauthorized access to any of your PII, we seek to use reasonable organizational, technical, and administrative measures to protect the PII we maintain within our organization. In addition to the safeguards we apply to protect your PII, there are steps you can take to protect it as well, such as never sharing your passwords and maintaining them in a secure location. The steps you take to complement the many safeguards we apply are particularly important.

VII. Scope of Users

Our Sites are not directed to users under the age of 13. We do not knowingly collect PII online from any person we know to be under the age of 13.

Our Sites are designed for users from, and are controlled and operated by us from, the United States. By using our online services, you consent to the transfer of your information to the United States, which may have different data protection rules than those of your country.

VIII. How to Contact Us

If you have any questions regarding this Policy, please call us at 833-MIZRAHI or 833-649-7244, or write to us at:

Mizrahi Tefahot Bank Ltd.
Attn.: Privacy Officer
Los Angeles Branch
800 Wilshire Boulevard, Suite 1410
Los Angeles, CA 90017