

Last Revised on: January 17, 2024

California Disclosures and Privacy Notice

Republic Bank & Trust Company (“Republic Bank”) provides these disclosures and privacy notice (the “Notice”) to comply with the California Consumer Privacy Act of 2018 and amending statutes including the California Privacy Rights Act of 2020 (“CCPA”) and other California privacy laws. **If you do not reside in California, you can skip this Notice.**

This Notice ONLY applies to:

- Information Republic Bank collects on California residents via:
 - Its websites, including www.republicbank.com, www.republicrefund.com, www.republictaxpayer.com, www.republicverify.com, www.mymemorybank.com, www.rbmax.net, www.republicbankfinance.com, and any other Republic Bank website that links to this Notice, and their various subdomains (collectively, the “Website”);
 - Your Business Online Banking account and Business Mobile Banking App (collectively, the “Business Online Banking Platform”); and
 - The Republic Bank Mobile App, the Republic Bank TRS Mobile App, and any other Republic Bank application unless otherwise specifically disclosed (the “Platform”).

This Notice DOES NOT Apply To:

- Non-California residents;
- Information Republic Bank collects through other websites or platforms (that are not the Website, Platform, or Business Online Banking Platform) associated with Republic Bank’s Republic Processing Group (“RPG”) products (which may provide separate, product-specific California disclosures and privacy notices, as applicable, depending on the product); and
- The following information relating to personal or household financial products or services:
 - Information you provide to Republic Bank when applying for a financial product for personal, household, or family use;
 - Information resulting from your personal financial transaction; and
 - Information Republic Bank obtains about you in providing you with a personal or household financial product or service.

What Personal Information Republic Bank Collects About You

Republic Bank collects information that identifies, relates to, describes, or could reasonably be linked, directly or indirectly, with a particular consumer (“personal information”).

Personal information does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information; and
- Information excluded from the CCPA, such as personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), and California Financial Information Privacy Act (FIPA).

In the past twelve months, Republic Bank may have collected a variety of personal information about you, depending on your interactions with Republic Bank, including:

- **Direct Identifiers** like name, email address, postal address, and telephone number;
- **Indirect Identifiers** like birth date, occupational title, and other data reasonably capable of being associated with or could reasonably be linked to, you;
- **Commercial information** including records of personal property, products, or services obtained or other purchasing or consuming histories or tendencies;
- **Electronic information** such as user content, including your communications with Republic Bank, and any other content you provide, such as photographs, images, videos, and other content;
- **Internet or other electronic network activity information** including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website application or advertisement;
- **Characteristics of protected classifications** under California or federal law, such as whether you have a disability that requires reasonable accommodation during the Republic Bank Careers submission process;
- **Imprecise geolocation data** including through your IP address or your zip code;
- **Sensitive Personal Information** such as Social Security Number, Government issued ID, and precise geolocation;
- **Biometric Information** such as biological characteristics used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints;
- **Sensory Data** such as audio, electronic, visual, thermal, olfactory, or similar information;
- **Professional and Employment Related Information** such as current or past job history or performance evaluations; or
- **Inferences** such as profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How Republic Bank Obtains Your Personal Information

<p>Directly from you</p>	<p>You enter or provide us with information, whether online or by email, phone, or document upload.</p> <p>For example, your contact information that you provide, your application for a loan, or documents you provide to verify your identity.</p>
<p>Directly and indirectly from you based on activity on the Website, Platform, or Business Online Banking Platform</p>	<p>From submissions through the Website, Platform, or Business Online Banking Platform or usage details of the Website, Platform, or Business Online Banking Platform collected automatically, which may include usage details, IP addresses, your internet connection, the equipment you use to access Republic Bank’s Website, Platform, Business Online Banking Platform and information collected through cookies, web beacons, and other tracking technologies.</p>
<p>From service providers, vendors, and third parties that interact with Republic Bank in connection with the services it performs</p>	<p>For example, companies that work with Republic Bank to market its products to you, credit reporting agencies from which Republic Bank checks your credit in connection with a submitted application, or other service providers, and vendors that provide data Republic Bank uses in underwriting or in protecting you and Republic Bank’s products from fraud and identity theft.</p>

How Long Republic Bank Retains Your Personal Information

Republic Bank retains Personal Information only as long as is reasonably necessary for the purpose we collected it, after which time it is securely destroyed.

How Republic Bank Uses Your Personal Information

In the past twelve months, Republic Bank may have used personal information, depending on how you interact with us, to:

- Process applications and transactions for business accounts;
- Verify your identity such as when you access your business account information or apply for a business account;
- Present the Website, Platform, or Business Online Banking Platform and their contents to you;
- Provide you with information, products, or services that you request from Republic Bank;
- Provide you with notices about your business accounts;
- Carry out Republic Bank's obligations and enforcing Republic Bank's rights arising from any contracts entered into between you and Republic Bank, including for billing and collection;
- Work with marketing partners to provide you with information about products or services that may be of interest to you;
- Prevent fraud and enhance the security of your business accounts or online services;
- Respond to your requests and communicate with you regarding your business account or inquiries;
- Manage your preferences;
- Provide you tailored content and marketing messages;
- Operate, evaluate, and improve Republic Bank's products (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing, and other internal functions);
- Fulfill any other purpose for which you provide your personal information and in any other way Republic Bank describes when you provide the personal information; and
- Comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations, and Republic Bank's policies;

Republic Bank may also use data that it collects on an aggregate or anonymous basis (which does not identify any individual person) for various business purposes, where permissible under applicable laws and regulations.

Republic Bank does not use your sensitive personal information for purposes other than those expressly permitted by applicable law.

Disclosure of Your Information

Republic Bank may disclose your personal information to a service provider, contractor, or third party. When Republic Bank discloses personal information to a service provider or contractor, Republic Bank enters a contract that describes the purpose and requires the service provider to both keep that personal information confidential and not use it for any purpose except performing the contract or as otherwise permitted under the CCPA. Republic Bank discloses personal information to the following:

- to Republic Bank's parent company, Republic Bancorp, Inc., as well as to any subsidiary or affiliate (if applicable);
- to retailers and other third parties to market to you when permitted by law;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Republic Bank's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Republic Bank about its Website, Platform, and/or Business Online Banking Platform users is among the assets transferred; and
- to fulfill the purpose for which you provide it.

Republic Bank may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government, regulatory, or law enforcement subpoena or other request;
- to enforce or apply Republic Bank's agreement(s) with you, including for billing and collection purposes; and
- if Republic Bank believes disclosure is necessary or appropriate to protect the rights, property, or safety of Republic Bank, our customers, or others (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

Republic Bank may disclose aggregated information about our users, and information that does not identify an individual.

In the past twelve months, Republic Bank has disclosed your personal information to the following categories of third parties, which do not include Republic Bank's service providers and contractors:

Category of Personal Information	Category of Third Party
Direct Identifiers, Commercial Information, Sensitive Personal Information	Republic Bank's subsidiaries (if any) and parent company
Direct and Indirect Identifiers	Retailers and advertising partners
Direct and Indirect Identifiers	Analytics Companies

Republic Bank uses Google Analytics on some of its Websites, Platforms, and/or Business Online Banking Platform. You may see how Google uses information from the Websites, Platforms, and/or the Business Online Banking Platform that use its services at www.google.com/policies/privacy/partners/.

Consumer Financial Privacy Notice

If you have inquired about or obtained a personal or household financial product or service from Republic Bank, please also carefully read Republic Bank's [General Privacy Notice](#) located at www.republicbank.com or the privacy notice that you received in connection with a Republic Bank product that has privacy practices different than those stated in the General Privacy Notice so that you may understand how your information is protected.

Children Under the Age of 16

Republic Bank's Website, Platform, or Business Online Banking Platform are not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website, Platform, or Business Online Banking Platform. Republic Bank does not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information to or on the Website, Platform, Business Online Banking Platform, or through any of their features. If Republic Bank learns it has collected or received personal information from a child under 16 without verification of parental consent, Republic Bank will delete that information. If you believe Republic Bank might have any information from or about a child under 16, please contact us in one of the ways provided in the Contact Information section below.

Data Security

Republic Bank has implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where Republic Bank has given you (or where you have chosen) a password for access to certain parts of the Republic Bank Website, Platform, or Business Online Banking Platform you are responsible for keeping this password confidential. Republic Bank asks you not to share your password with anyone.

Your Rights Under the CCPA

The CCPA provides California residents with specific rights regarding their personal information — the Right to Know, the Right to Delete, the Right to Correct, the Right to Opt-Out of the Sale of Personal Information or the Sharing of Personal Information, The Right to Limit the Use of Sensitive Personal Information, and the Right to Non-Discrimination. This section describes your CCPA rights and explains how to exercise those rights, if applicable.

Right to Know

You have the right to request that Republic Bank discloses certain information to you about its collection, use, and disclosure of your personal information over the past 12 months (“Request to Know”). Once Republic Bank receives and verifies your Request to Know, Republic Bank will disclose to you either:

- Categories of Personal Information Collected, Disclosed, Sold, and/or Shared
 - The categories of personal information Republic Bank collected about you.
 - The categories of sources for the personal information Republic Bank collected about you.
 - Republic Bank’s business or commercial purpose for collecting that personal information.
 - The categories of third parties with whom Republic Bank shared that personal information.
 - If Republic Bank disclosed your personal information to third parties, the corresponding categories of personal information.
 - If Republic Bank sold or shared your personal information for cross-contextual behavioral advertising, the categories of personal information sold or shared.
- Specific Information
 - The specific pieces of personal information Republic Bank collected about you.

Right to Delete

You have the right to request that Republic Bank delete your personal information (“Request to Delete”). Once Republic Bank receives and verifies your Request to Delete, Republic Bank will delete your personal information from its records, unless an exemption or exception applies.

Republic Bank may deny your Request to Delete if retaining the personal information is necessary for Republic Bank or its service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- To enable solely internal uses that are reasonably aligned with the expectations of you based on your relationship with us;
- Comply with a legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Additionally, Republic Bank may deny your Request to Delete if it is unable to verify your identity or have reason to believe that the request is fraudulent.

Right to Correct

You have the right to request that Republic Bank correct your inaccurate personal information (“Request to Correct”). Once Republic Bank receives and verifies your Request to Correct, Republic Bank will use commercially reasonable efforts to correct your inaccurate personal information in our records.

Right to Limit the Use of Sensitive Personal Information

You have the right to direct a business that collects your sensitive personal information to limit its use to uses that are necessary to perform the services or provide the goods reasonably expected. However, Republic Bank only uses Sensitive Personal Information to provide the goods and services requested by you; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for such actions; to ensure people's physical safety; to perform services on our behalf; or to verify or maintain the quality or safety of our products, services, and devices.

Right to Opt-Out:

The CCPA gives you the right to opt-out of 1) the sale of your personal information, 2) the sharing of your personal information for cross-context behavior advertising, or 3) for use in automated decision making. However, Republic bank does not sell or share your personal information.

The CCPA gives you the right to opt-out of the use of automated decision-making technology in connection with decisions about your work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. However, Republic Bank does not use automated decision-making technology for personal information that is not covered by FCRA, GLBA, and CalFIPA.

Right to Non-Discrimination:

Republic Bank will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, Republic Bank will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Submitting a Request to Know, Request to Delete, or Request to Correct

How to Submit a Request

To make a Request to Know, Request to Delete, or Request to Correct, please contact us by either:

Calling us at 1-888-584-3600

Visiting [webform](#)

Making a Request to Know, Request to Delete or Request to Correct does not require you to create an account with Republic Bank.

Only 1) you or 2) a person authorized by you to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child.

Requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom Republic Bank collected personal information or are an authorized representative. Given the sensitivity of your personal information that Republic Bank collects and retains, Republic Bank will need to verify your identity with at least three separate pieces of information such as name, address, account number, date of birth, last four digits of your Social Security Number, phone number, etc.; or
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Requests for deletion will require a separate confirmation that you want your information deleted.

Authorized Agents

Before Republic Bank can respond to a Request to Know, Request to Delete, or Request to Correct submitted by an authorized agent, Republic Bank needs to confirm not only that person or entity's authority to act on behalf of a consumer, but also to verify the identity of the authorized agent. If you are authorized to submit a request on behalf of a California resident, please email us at InfoSecurity@republicbank.com and provide the following information:

1. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:
 - written permission from the California resident, or
 - power of attorney.
2. To verify your identity, please attach copies of the following to your request email:
 - Valid Government Issued ID (not expired) **AND**
 - a Utility Bill, Bank Statement, or similar documentation to verify your name and address.
3. You will also be required to verify the identity of the consumer for whom you are submitting the request.

Response To Requests

Republic Bank will acknowledge receipt of a Request to Know, Request to Delete, or Request to Correct and provide a response in the time permitted by law. Republic Bank will respond via email.

Republic Bank does not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded.

Do Not Track Signals

Do Not Track is a web browser setting that requests websites and applications to disable their tracking of an individual user. Our site does not honor Do Not Track settings in your browser.

Mobile Deposit Image Capture

For the purpose of Mobile Deposit image capture, images may be collected from your device using the camera. Republic Bank will ask your permission to enable device camera features before you use the mobile deposit feature for the first time.

Changes to Republic Bank's Notice

Republic Bank will post any changes it makes to this Notice. Please check this Notice regularly.

Social Media

Republic Bank encourages you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with Republic Bank.

How to Contact Republic Bank

You, or your authorized representative, can submit requests using the following [webform](#) or by calling 1-888-584-3600. Your request will be verified using information you provide as described on the webform. If you call 1-888-584-3600 you will be asked to provide the same information requested on the [webform](#) for verification purposes. Requests for deletion and right to know request will require a separate confirmation that you want your information deleted.

To ask questions or comment about this Notice or Republic Bank's privacy practices, contact:

Republic Bank at: Tel: 1-888-584-3600

E-mail: InfoSecurity@republicbank.com