

BANK HAPOALIM B.M. **PRIVACY POLICY FOR CALIFORNIA RESIDENTS**

This Privacy Policy for California residents (the “**Policy**”) is provided by Bank Hapoalim B.M. (the “**Bank**,” “**us**,” or “**we**”) pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), as amended. This Policy supplements the Bank’s general privacy policy. (the “**General Privacy Policy**”) and applies solely to residents of the State of California (“consumers” or “you”).

This Policy explains how the Bank collects, uses, and discloses “Personal Information” relating to California residents. Under the CCPA, Personal Information is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. As amended, the CCPA also defines additional categories of “Sensitive Personal Information.”

Any capitalized terms defined in the CCPA or in the General Privacy Policy, as applicable, have the same meaning when used in this Policy.

Personal Information that we collect

The Bank has collected and disclosed to third parties for business purposes the following categories of Personal Information relating to California residents in the past 12 months:

Category of Personal Information	Examples	Collected
Identifiers	Real name; 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
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
Protected classification characteristics under California or federal law	Protected classification status including gender, marital status, national origin, military status, and others	Yes
Commercial information	Information on purchases of products or services; purchasing histories or tendencies	Yes
Biometric information	Fingerprints; faceprints; voiceprints; keystroke patterns	Yes

Category of Personal Information	Examples	Collected
Internet or other similar network activity	Internet browsing history; search history; data generated by your interaction with our website, application, or advertisement	Yes
Geolocation data	Device location; any information used to identify your physical location	Yes
Sensory data	Audio, electronic, visual, or similar information, such as call and video recordings	Yes
Professional or employment-related information	Work and employment history; salary; references	Yes
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Student records	Yes
Inferences drawn from other personal information	Inferences or conclusions drawn from any of the above categories in order to analyze the information, segmentation, characterization of the habits of using the services and consumption habits, direct mailing and focusing on advertising information.	Yes

The Bank has collected the following categories of Sensitive Personal Information of California residents in the past 12 months.

Category of Sensitive Personal Information	Examples	Collected
Government issued identifiers	Consumer's social security number; driver's license; state identification card; passport number	Yes

The Bank 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).

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 or Commercial Purposes

The categories of third parties to which we have disclosed Personal Information for our business or commercial purposes described in this 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 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 or commercial 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 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” or “sharing” of Personal Information or Sensitive Personal Information, as those terms are defined under the CCPA, as amended, because BHBM does not “sell” or “share” your Personal Information or Sensitive Personal Information.

BHBM has not “sold” or “shared” 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.

Retention Periods

We will only retain personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

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 a "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 a "Right to Delete Request." We generally collect 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 our customer service center by dialing *2407 (from Israel); or
2. Submit your request via email to mailbox.privacy@poalim.co.il

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 us to submit a Request.

We will advise you in our response if we are not able to process your Request. We may not process your Request where an exception applies.

If you have questions or concerns about BIBM's privacy policies and practices, you may contact our customer service center by dialing *2407 (from Israel) or emailing

mailbox.privacy@poalim.co.il

Changes to this Policy

This Policy was last updated on March 12, 2024. BHBM 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.

Contact us

If you have any questions, please contact our customer service center by dialing *2407 (from Israel), or via email to mailbox.privacy@poalim.co.il.

Last Updated on March 12, 2024.