

California Consumer Privacy Act Notice

This California Consumer Privacy Act Notice (“Notice”) supplements the information contained in the Thread Bank (collective, “we,” “us,” or “our”) Privacy Policy. It applies solely to our visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Notice.

This Notice does not apply to information collected, processed, or disclosed in connection with the provision of financial products or services pursuant to the Gramm-Leach Bliley Act, its implementing regulation and/or other applicable regulations and laws.

Collection and Use of Personal Information

We may collect (or in the past 12 months may have collected) the following categories of personal information related to California residents covered by this Notice:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, age, sex, gender, disability, and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications, or advertisements
- **Geolocation Data**
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information, such as information relating to your job position (e.g., job title, job description and office location), talent management information (e.g., résumé information, occupation details, education details, certifications and professional associations, historical compensation details, previous employment details, and pre-employment screening and background check information, including criminal records information) and emergency contact information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Last Updated April 2024

We do not collect or process sensitive personal information to infer characteristics about California consumers covered by this Notice.

Retention of Personal Information

We will retain your personal information as necessary to achieve the purposes described in the Thread Bank Privacy Policy, this Notice, or any other notice provided at the time of collection, considering records retention requirements under applicable law.

Sale of Personal Information

Thread Bank does not sell personal information subject to the CCPA, nor have we sold personal information of minors under the age of 16.

Disclosure of Personal Information

Thread Bank may collect, use, and disclose Personal Information to a third party for business purposes, as defined by our Privacy Policy. When or if we disclose Personal Information for a business purpose, it is under the terms of a contractual relationship that describes the nature and purposes of the information sharing and requires the recipient to securely retain and keep confidential all Personal Information, and not use it for any purposes except for performing services as defined within the executed contract.

In the preceding 12 months, we may have disclosed the following categories of personal information for a business purpose:

Category of Personal Information	Category of Third Party
Identifiers	<ul style="list-style-type: none">• Our affiliates and subsidiaries• Vendors who perform services on our behalf• Professional services organizations, such as auditors and law firms• Our business clients and partners• Internet service providers and operating systems and platforms• Online advertising services• Data analytics providers• Data brokers, such as credit reporting agencies and background check services
Additional Data Subject to Cal. Civ. Code § 1798.80	<ul style="list-style-type: none">• Our affiliates and subsidiaries• Vendors who perform services on our behalf• Professional services organizations, such as auditors and law firms• Our business clients and partners• Data analytics providers• Data brokers, such as credit reporting agencies and background check services

Category of Personal Information	Category of Third Party
Protected Classifications	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who perform services on our behalf • Professional services organizations, such as auditors and law firms • Our business clients and partners • Data analytics providers • Data brokers, such as credit reporting agencies and background check services
Commercial Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who perform services on our behalf • Professional services organizations, such as auditors and law firms • Our business clients and partners • Online advertising services • Data analytics providers
Online Activity	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who perform services on our behalf • Professional services organizations, such as auditors and law firms • Internet service providers and operating systems and platforms • Online advertising services • Data analytics providers
Geolocation Data	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who perform services on our behalf • Professional services organizations, such as auditors and law firms • Internet service providers and operating systems and platforms • Data analytics providers
Sensory Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who perform services on our behalf • Professional services organizations, such as auditors and law firms • Our business clients and partners • Data analytics providers
Employment Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who perform services on our behalf • Professional services organizations, such as auditors and law firms • Our business clients and partners • Data analytics providers

Category of Personal Information	Category of Third Party
	<ul style="list-style-type: none">• Data brokers, such as credit reporting agencies and background check services
Inferences	<ul style="list-style-type: none">• Our affiliates and subsidiaries• Vendors who perform services on our behalf• Professional services organizations, such as auditors and law firms• Our business clients and partners• Online advertising services• Data analytics providers

In addition, and during the preceding 12 months, Thread Bank may have also shared Personal Information about you with government entities, such as law enforcement or regulatory agencies.

Your California Consumer Privacy Rights

The CCPA provides California residents (covered by the CCPA) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access: You have the right to request the following information covering the 12 months preceding your request:

- The categories of personal information we have collected;
- The categories of sources used to collect the personal information;
- The business or commercial purposes for collecting your personal information;
- The categories of third parties with whom we share your personal information; and,
- The specific pieces of personal information we have collected about you.

Correction: You have the right to request, in certain circumstances, that we correct inaccurate personal information that we have collected about you.

Deletion: You have the right to request, where applicable and allowable by law, deletion of your personal information that we have collected about you.

Opt-Out of Sale or Sharing: You have the right to opt out of our selling or sharing of your personal information for the purpose of cross contextual behavioral advertising.

You also have the right to not be discriminated against for exercising any of these rights.

How to Exercise Your Rights Under the CCPA:

To submit an access, correction, or deletion request, email us at privacy@thread.bank or call us at 423-272-2200.