California Privacy Policy

The California Consumer Privacy Act (CCPA), as amended, gives California resident consumers more control over the personal information that businesses collect about them and the CCPA regulations provide guidance on how to implement the law. This law secures privacy rights for California resident consumers, including:

- The right to know about the personal information a business collects about them and how it is used and shared;
- The right to delete personal information collected from them (with some exceptions);
- The right to opt-out of the sale or sharing of their personal information;
- The right to non-discrimination for exercising their CCPA rights**;**
- The right to correct inaccurate personal information that a business has about them; and
- The right to limit the use and disclosure of sensitive personal information collected about them.

Under the CCPA, "Personal Information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked directly or indirectly to a particular California resident or your household. Common examples include personal data such as your name, Social Security number, customer account number, email address, internet browsing history, geolocation data, fingerprints, records of products purchased and inferences from other personal information that could create a profile about your preferences and characteristics.

"Sensitive Personal Information" under the CCPA is a specific subset of personal information that includes certain government identifiers (such as Social Security numbers); an account log-in, financial account, debit card, or credit card number with any required security code, password, or credentials allowing access to an account; precise geolocation; contents of mail, email, and text messages; genetic data; biometric information processed to identify a consumer; information concerning a consumer's health, sex life, or sexual orientation; or information about racial or ethnic origin, religious or philosophical beliefs, or union membership. Consumers have the right to also limit a business's use and disclosure of their sensitive personal information.

The CCPA, however, does not apply to certain information, such as publicly available information that is from government records and information subject to the Gramm-Leach-Bliley Act ("GLBA").

Collection of personal information

The types of personal information we collect and share depends on the product or service you have with us. In the past twelve months (12) we may have collected for our business purposes the following categories of personal information:

- Identifiers, such as name, e-mail address, or other similar identifiers;
- Social Security number and income;
- Account balances and transaction history;
- Payment history and credit scores;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e), such as address or telephone number (some personal information included in this category may overlap with other categories);
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as records of personal property or purchase history;
- Geolocation data, such as device location or Internet Protocol (IP) location;
- Professional or employment-related information, such as current or past work history;
- Biometric – Voice form CIC/Mobile Face/Finger Print

Personal information does not include:

- Publicly available information from government records
- Aggregated consumer information lawfully made available to the general public or disclosed by the consumer without limitation to a specific audience
- Other information excluded from CCPA's scope, such as:
    - Personal information covered by certain specific privacy laws, including the Fair Credit Reporting Act (FCRA) and GLBA.

We may obtain the categories of information listed above from the following categories of sources:

- Directly or indirectly from individuals, our customers, consumers, or their representatives;
- From service providers and vendors;
- From our affiliates;
- Public record sources.

Use of personal information for business purposes

We may use or disclose personal information we collect to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- Undertaking activities to verify or maintain the quality of a service or product that is controlled by us, and to improve, upgrade, or enhance the service or product that is controlled by us;
- Undertaking internal research for technological development and demonstration;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;

- Auditing related to a current interaction and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying position and quality of ad impressions, and auditing compliance with this specification and other standards;
- Short-term, transient use, provided that the personal information is not disclosed to a third party and is not used to build a profile or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance).

Sharing of personal information

We may disclose your personal information only for a business purpose to the following categories of third parties:

- Our affiliates;
- Service providers and vendors;
- Government agencies as required by laws and regulations.

In the preceding twelve (12) months, we may have disclosed the following categories of personal information to one or more of the categories of third parties listed above for a business purpose:

- Identifiers;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e));
- Characteristics of protected classifications under California or federal law;
- Commercial information;
- Geolocation data;
- Professional or employment-related information.

We have not "sold" personal information subject to the CCPA. For purposes of this Disclosure, "sold" means the disclosure of personal information to a third-party for monetary or other valuable consideration.

Rights under the CCPA

The CCPA provides California residents with certain rights regarding their personal information. California residents have the right to:

- Request that we disclose to you certain information about Rockland Trust's collection and use of your personal information over the past twelve (12) months, including:
    - 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 with whom we shared personal information about you and, if applicable, the categories of personal information that were disclosed; and
    - The specific pieces of information of personal information we collected about you.

- Request we delete personal information we collected from you, unless the CCPA recognizes an exemption.
- Be free from unlawful discrimination for exercising your rights under the CCPA.

What to expect from Rockland Trust

Upon receipt of a request from you, we will provide acknowledgement within 10 business days and advise you how long we expect it to take to fully respond once we are able to verify your identity. Additional information may be required to verify your identity if you request specific pieces of personal information. An authorized agent may submit a request on behalf of another person. In those situations, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request. Each request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We cannot fully respond to your request or provide you with personal information if we cannot verify your identity or if we cannot verify that you have authority to make the request on behalf of another individual. In addition, we will not process your request where an exception under the CCPA applies. We will advise you in our response if we are not able to process your request. Please note that, in response to a request, we will not provide specific Social Security numbers, driver's license numbers, other government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords, security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will fully respond to a verified request within 45 calendar days of its receipt, as required under the CCPA. If we require additional time (up to an additional 45 calendar days), we will inform you of the extension in writing and explain the reason for the delay. We are not obligated to provide personal information more than twice in a twelve (12) month period.

We will not charge a fee to you or your authorized representative to process your request unless it is duplicative, repetitive, or manifestly burdensome. If it is determined that a fee is warranted, we will disclose the amount of the fee to you prior to processing your request.

We reserve the right to amend this privacy notice at our discretion and at any time.

Exercising your rights

If you are a California resident and would like to exercise the rights described above, please submit a verifiable request by:

- Calling us at **800.222.2299**
- Mail inquiry to: Rockland Trust Company Marketing Dept., 1 Technology Place, Rockland, MA 02370
- General contact
- Live chat