



# California Consumer Privacy Act Disclosure Notice – Flagstar Private Bank

Updated: April 15, 2024

Your privacy is important to us. This California Consumer Privacy Act Disclosure Notice (“**Notice**”) explains how Flagstar Bank, N.A. and its subsidiaries, Flagstar Advisors, Inc. and Flagstar Financial & Leasing, LLC (or of any successor thereto) together known as “Flagstar,” (collectively, “**Flagstar**”, “**we**” or “**us**”) collect, use, and disclose Personal Information relating to California residents that is subject to the California Consumer Privacy Act (“**CCPA**”). This Notice supplements the information contained in the Private Bank [Online Privacy Policy](#). Any Capitalized terms not defined within this document are defined in accordance with the CCPA, as amended.

## What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular California resident or household. The CCPA, however, does not apply to certain information, such as information collected, processed, sold, or disclosed subject to the Gramm-Leach-Bliley Act (“**GLBA**”).

As a result, this Notice does not apply with respect to, for example, information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (“**GLBA Consumers**”).

## Our Collection of Personal Information

We collect Personal Information relating to California residents in a variety of contexts. For example, we collect Personal Information relating to California residents who apply for employment with us or who are our employees or contractors, who are beneficiaries or dependents of our employees, and/or who are customers visiting our locations or facilities in California to obtain a product or service. The Personal Information that we collect, use, and disclose relating to a California resident will depend on our specific relationship or interaction with that individual.

In the past 12 months, we have collected the following categories of Personal Information relating to California residents:

1. Identifiers, such as name and Social Security number;
2. Personal information, as defined in the California safeguards law, such as contact information and financial information;
3. Characteristics of protected classifications under California or federal law, such as sex and marital status;
4. Commercial information, such as transaction and account information;
5. Biometric information, such as fingerprints;
6. Internet or network activity information, such as interactions with our website;
7. Geolocation data, such as device location;
8. Audio, electronic, visual, thermal, olfactory, and similar information, such as call and video recordings;
9. Professional or employment-related information, such as work history and prior employer;
10. Education information, such as school and date of graduation;
11. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics; and
12. Sensitive Personal Information, such as Social Security number, driver's license, state identification card, passport number, account number, racial or ethnic origin, religious beliefs, processing of biometric information for the purpose of uniquely identifying a Consumer, and Consumer's account log-in in combination with any required password allowing access to an account.

Flagstar does not retain a Consumer's Personal Information or Sensitive Personal Information for each disclosed purpose for which the Personal Information was collected for longer than is legally required or reasonably necessary for that disclosed purpose.

We have collected this Personal Information from the following types of sources:

1. Directly from California residents or their representatives; and
2. Consumer data resellers, such as Consumer credit reporting agencies and Consumer reporting companies.



## Our Use of Personal Information

The purposes for which we use or disclose the Personal Information that we collect depend on our relationship or interaction with a specific California resident. Nonetheless, we have used and may use Personal Information:

1. to operate, manage, and maintain our business;
2. to provide our products and services; and
3. for our employment and vendor management purposes.

Other important business-related purposes for which Personal Information is collected, stored, used, and shared include purposes such as to:

1. process transactions, payments, and maintain accounts;
2. detect and prevent fraud;
3. debug to identify and repair errors that impair existing intended functionality;
4. undertake internal research for technological development and demonstration;
5. perform identity verification;
6. perform accounting, audit, and other internal functions, such as internal investigations;
7. comply with law, legal process, and internal policies;
8. maintain business records; and
9. exercise and defend legal claims.

## Our Disclosure of Personal Information

In the past 12 months, we have disclosed the following categories of Personal Information relating to California residents to third parties for our business purposes:

1. Identifiers, such as name and Social Security number;
2. Personal information, as defined in the California safeguards law, such as contact information and financial information;
3. Characteristics of protected classifications under California or federal law, such as sex and marital status;
4. Commercial information, such as transaction and account information;
5. Biometric information, such as fingerprints;
6. Internet or network activity information, such as interactions with our website;
7. Geolocation data, such as device location;
8. Audio, electronic, visual, thermal, olfactory, and similar information, such as call and video recordings;
9. Professional or employment-related information, such as work history and prior employer;
10. Education information, such as school and date of graduation;
11. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics; and
12. Sensitive Personal Information, such as Social Security number.

We have disclosed this Personal Information for our business purposes to the following types of third parties:

1. Service providers and vendors contracted by Flagstar to provide account transactions and maintenance, and other products or services;
2. Consumer information repository service providers to obtain information, such as to verify your identity; and
3. Government entities.

We do not sell your Personal Information to third parties for money. However, the use of certain analytical and tracking tools may constitute the sale or sharing of information under the CCPA. **In the preceding 12 months, we used marketing or analytical tools that may constitute a sale or sharing of the following category of information:** geolocation. The recipients of this information are providers of marketing and analytics services. You may learn more about your right to opt-out of the use of this data for targeted advertising, and the sale or sharing of this data, below.

We use Google Analytics to generate statistical and other information about the use of the site by means of cookies. To learn more about Google's Privacy Policy, please visit: <http://www.google.com/policies/privacy>. You can also learn more about how to opt out of the collection and processing of such information by Google Analytics by visiting this website: <https://tools.google.com/dlpage/gaoptout>.



We do not use or disclose Sensitive Personal Information for purposes other than those specified in Cal. Civ. Code § 1798.121 (2023). We do not knowingly sell or share the Personal Information of California residents that are less than 16 years of age.

### Requests Under the CCPA

If you are a California resident, you may request that we disclose to you the following information:

1. the categories of Personal Information that we collected about you and the categories of sources from which we collected such Information;
2. the business or commercial purpose for collecting Personal Information about you;
3. the categories of Personal Information about you that we disclosed to third parties for a business purpose and the categories of third parties to whom we disclosed such Personal Information (if applicable); and
4. the specific pieces of Personal Information we collected about you.

If you are a California resident, you may also request that we delete Personal Information that we collected from you. You may also request that we correct inaccurate Personal Information that we maintain about you.

You have the right to opt-out of the use of your Personal Information for targeted advertising and the sale or sharing of your Personal Information by going to the "[Do Not Sell or Share My Personal Information](#)" link on our webpage and following the instructions provided.

To submit a request, we are required to verify your identity. Please be prepared to provide us with your first and last names, address, telephone number, and e-mail address. We will match the Personal Information that you provide to us with Personal Information that we already maintain about you in order to verify your identity. We may also need to contact you to confirm your request.

You may also designate an authorized agent to make such requests on your behalf by providing your authorized agent with power of attorney or providing us with written permission that you have authorized the agent to act on your behalf.

In some instances, we may decline to honor your request. For example, we may decline to honor your request if we cannot verify your identity or confirm that the Personal Information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another Consumer or where the Personal Information that we maintain about you is not subject to certain of the CCPA's rights, such as information collected, processed, sold, or disclosed subject to the GLBA.

Nonetheless, you have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

### How to Make Requests or Contact Us

If you are a California resident, you may make a request for the disclosures described above, make a request to delete Personal Information we collected from you, or make a request to correct Personal Information we maintain about you by contacting us at:

1. 1-866-744-5463; or
2. [Submit your online request.](#)

You may contact us with questions or concerns about our privacy policies and information practices by contacting us at 1-866-744-5463 or by emailing [privacy@flagstar.com](mailto:privacy@flagstar.com).

### Changes to The California Consumer Privacy Act Disclosure Notice

We may change or update this Notice from time to time. When we do, we will post the revised Notice on this page with a new "Last Updated" date. Unless otherwise stated, any modifications to this Notice will go into immediate effect after they have been posted.