

NCONTRACTS ONLINE CCPA POLICY

PRIVACY POLICY- CALIFORNIA RESIDENTS ONLY

Last updated: August 18, 2023

This Policy applies to the Service – Ncontracts’ integrated solutions for vendor, risk and compliance management for financial institutions and other companies, including our website www.ncontracts.com <https://www.ncontracts.com/>(the “Website”). If you do not agree with its terms, do not access or use the Service.

Ncontracts (“us” or “we”) collects, uses, and discloses certain information about people who visit our Website or use the Service.

The California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”) gives California “residents” who are “consumers” specific rights to their “personal information” as each of those quoted terms are defined in that law. These rights are subject to exceptions and limitations stated in the CCPA, including financial information covered under the Gramm-Leach-Bliley Act (“GLBA”). We will refer to such California residents and consumers as “you.”

The CCPA only applies to certain businesses. To the extent it applies to us, this policy describes your rights and our online practices regarding personal information.

This Policy applies to:

- Personal information that either does or could be used to identify you, such as name, email, device identifiers and most recently visited Internet site (“**Personal Information**”). Some parts of this Policy may apply more specifically to a subset of Personal Information referred to as “Sensitive Personal Information” under the CPRA. Sensitive Personal Information includes certain government identifiers (such as social security numbers); financial account, debit card, or credit card number with any required security code, password, or credentials allowing access to the 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.
- All users within any business entity (“**Organization**”) or individual (each a “**Customer**”) who has contracted to use the Service.

This Policy does not apply to:

- The processing and handling of all information which is not Personal Information (“**Content**”) through the Service, which is governed by a separate agreement (“**Terms of Service**” or “**TOS**”).
- Any third-party applications or software that integrate with the Service through the Ncontracts platform (“**Third-Party Services**”), or any other third-party products, services, business files or other information submitted through Service accounts (collectively, “**Third-Party Data**”).
- Information that is publicly available through government records.
- Aggregated or de-identified data that cannot be used to identify any natural person, which we may use for any legitimate business purpose.
- Personal Information covered by subject matter federal privacy laws such as The Fair Credit Reporting Act and the GLBA.

If you have an individual account for the Service, when we use “you,” you are both the Customer and User of the account.

Your rights under the CCPA

With respect to Personal Information that we collect directly from you or through your interaction with our website, California residents have the rights detailed below.

Please note that in most cases, we will not have your Personal Information unless it was submitted to us directly by you or collected through your interaction with our website. In some cases, however, we may process your Personal Information on behalf of our financial institution customers that have shared your Personal Information with us for a business purpose pursuant to a contract with the financial institution. With respect to any Personal Information that we have received in our role as service processor, you will be required to make verifiable consumer requests to the financial institution responsible for collecting your Personal Information, and we will cooperate with the financial institution’s response to your verifiable consumer request in accordance with the CCPA and CPRA.

Right to know

A California resident who is a consumer has the right to request and know what Personal Information we collect, use, or disclose, over the 12-month period immediately preceding our receipt of the verifiable consumer request, including specific pieces of that information.

You may exercise this right to know by sending us a “verifiable consumer request” showing that you are requesting your own Personal Information. If you have an account with us, you may submit the request by accessing and filing out our interactive webform at <https://help.ncontracts.com/s/ncontractssupport>. We will verify your request based on your access to the Service. We will also require that you re-authenticate

yourself before we disclose your Personal Information to you. You may make this request twice in a 12-month period. If you do not have an account with us, then we will defer you to your financial institution to exercise this right.

If you do not have an account with us, please submit your request to: <https://help.ncontracts.com/s/ncontractssupport>. To verify the identity of persons without an account, you must provide us with (1) your name and email address (we may require more information depending on the circumstances), and (2) a declaration, signed under penalty of perjury, that you are requesting your own Personal Information. We will attempt to match your identity with information in our possession. Once we receive and confirm your verifiable consumer request we will respond within 45 days, or if we need more time, we will tell you why and how much longer (up to an additional 45 days) we will need. We will then disclose to you:

- The categories of Personal Information we collected about you;
- The categories of sources for the collected Personal Information;
- Our business purpose in collecting that Personal Information;
- The categories of third parties to whom we have shared that Personal Information;
- Specific pieces of Personal Information we collected (also known as the data portability right); and
- If we disclosed your Personal Information for a business purpose, a list of the Personal Information categories for each category of Personal Information Disclosed.

For current or former Ncontracts employees wishing to make a request regarding their Personal Information, you may submit the request to hr@ncontracts.com.

For data portability requests, we will provide the information in a readily usable format which should permit you to easily transfer the information to another business.

In the last 12 months, we collected the following categories of Personal Information from the sources stated below:

Category	Source	Examples
1. Identifiers	Website user	name, email address, phone number
2. Sensitive Personal Information	Website user	social security number, driver's license number, account log-in credentials, credit or debit card number in combination with security code

3. Internet or other electronic network activity info	Website visitors or users	IP address
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The Ncontracts Website uses cookies and similar tracking technologies to help you personalize your online experience. These technologies may collect Personal Information about you across other websites and online services. You have the ability to accept or decline cookies. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Ncontracts Services or Websites you visit.

In the last 12 months, we have disclosed the following categories of Personal Information to the below described categories of third parties:

Category of Information Disclosed / Category of Third Parties

Category	Category of Third Parties
Identifiers	Service Providers
	Sub-processors
Sensitive Personal Information	Service Providers
	Sub-processors
Internet or other electronic network activity info	Analytics
	Our affiliates

We also collect and may disclose Personal Information for the following business or commercial purposes:

- For audits relating to current interactions with consumers;
- To detect security incidents and protect against malicious, fraudulent or illegal activity;
- To debug and repair any errors which impair intended functionality;
- For short-term transient use;
- To perform services on behalf of our business, such as maintaining or servicing accounts or to provide customer service;
- To protect and enforce our rights, property or safety of us or others;
- As required by applicable law, court order or governmental regulation if we reasonably believe disclosure is required;

- As we have described to you when collecting your Personal Information or as stated in the CCPA or duly promulgated regulations thereto;
- To evaluate or engage in a merger or similar business transaction in which Personal Information is part of the assets transferred, subject to standard confidentiality provisions;
- For our internal research to develop new functionalities, products or services; and
- To verify or maintain the quality and safety of the Service.

We may share your Personal Information with our service providers and sub-processors.

No Sale of Personal Information

We do not and will not sell your Personal Information. As we prohibit the use of this Service by anyone under 16 years of age, we do not and will not sell their Personal Information.

Right to Delete

You have the right to delete Personal Information we collect or maintain, subject to exceptions in the CCPA, including information covered under the GLBA. You may exercise this right by making a request. You may submit your verifiable consumer request to delete your Personal Information the same way that you submit your Request to Know (see above). In addition, when we receive a request to delete, you will be required to send us a second request confirming your desire to delete. When the requirements for deletion have been met, we will tell you the manner in which your Personal Information was deleted and disclose that we will maintain a record of this request, as required by the CCPA.

We may deny your request for one or more of the reasons stated in the CCPA, such as completing the transaction for which we collected the information, or the information is covered under the GLBA, or the request is required to be handled by your financial institution, as stated above.

The process we will use to verify your request, and any information you need to provide, is stated above in **Right to Know**.

Right to Correct Inaccurate Personal Information.

You have the right to request that we update or correct your personal information when it is inaccurate or incomplete. For all requests, you must provide us with your name, email address, phone number, and mailing address. Failure to provide all of the foregoing information will prevent us from processing your request. You may exercise this right by submitting a verifiable consumer request in the same manner as you would submit a Request to Know (see above).

Right to Opt Out of Sharing of Personal Information.

You have the right to opt out of the sharing of your personal information for cross-context behavioral advertising, whether or not for monetary or other valuable consideration. You may exercise this right by submitting a verifiable consumer request in the same manner as you would submit a Request to Know (see above).

The Right to Limit the Use of Sensitive Personal Information.

You have the right to limit the use of “sensitive personal information,” as defined in the CPRA, to that which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services” or for the performance of specific enumerated business purposes.

Non-Discrimination Right

You have the right to not receive discriminatory treatment by us for the exercise of your privacy rights under the CCPA.

Right to appoint a designated agent

You have the right to designate an authorized agent to make a request on your behalf regarding your Personal Information.

No Financial Incentives

We do not offer financial incentives or price or service differences to you in exchange for retaining or disclosing Personal Information.

Contact Information

If you have any questions or concerns regarding our privacy policies and practices, please submit your request either through the service or to privacy@ncontracts.com.

Data Retention

We will retain your Personal Information as needed for the purposes described in this Policy, including our legitimate business interests, to perform our contracts, to comply with our legal obligations and to enforce our rights, and as directed by our financial institution customers. When no longer needed for these purposes, we will delete or anonymize your Personal Information.

Security – Personal Information

Ncontracts employs industry standard security practices and implements security-oriented technical and organizational measures, including regular third-party reviews. We require certifications from applicable primary processors and service providers.

Age Limitations

As fully as prohibited by applicable law, we do not allow use of the Service and Website by any persons less than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with Personal Information, please tell us and we will delete that information.

Changes to Privacy Policy

We may change this Policy from time to time to address new legal requirements relating to Personal Information or changes in product features or technology. If we do, we will post any changes on this page. To the extent we are not relying on your consent to process or share your Personal information, by your continued access to or use of the Service after those changes are in effect, you agree to the revised Policy. If we deem the changes to be material, we will give you 30 days advance notice via email before the change goes into effect and, if required by applicable law, we will seek your consent.

Contacting Ncontracts: <https://help.ncontracts.com/s/ncontractssupport>.