

# Privacy Policy

## Introduction

First American Equipment Finance, a City National Bank company (“FAEF,” “First American,” “we,” “us” or “our”) understands that when you interact with FAEF, including through our website, you may entrust us with your personal information. As a result, we have crafted this Privacy Policy (“Privacy Policy”) with you in mind, so that we can protect your personal information and inform you of your privacy rights. In this Privacy Policy, we explain our policies and procedures for data collection, use, maintenance, protection, and disclosure when you visit our website (the “Site”). This policy also governs and provides you with information concerning the data we collect from and concerning you when you interact with First American other than through our Site. This policy is effective as of March 1, 2023.

It is our mission to provide First American customers with complete financial solutions by making the full resources of our family of companies available. Nevertheless, First American companies do not share any client information with nonaffiliated third parties for marketing purposes. We never sell, and will not sell, any personal information collected under this Policy to anyone for any reason.

Unless you instruct us not to do so, our Privacy Policy permits your First American trusted advisors to selectively and confidentially disclose appropriate information with an affiliated First American company if she or he believes there is a resource that may be of interest to you or your company. We never do this for the purpose of broad-scale marketing from our affiliated companies, and every First American company is committed to protecting your privacy.

We will update this policy as we adjust our procedures to protect your information. Before these changes go into effect, we will post the updated policies and procedures here, along with an effective date for the amended Privacy Policy.

## About Your Use of this Site

### Automatically Collected Information

#### Automatic Information Collection

As is customary for websites, the Site will collect information, including technical and routing information about your computer, without you being prompted. This may include geolocation data and internet or other electronic network activity such as device identifiers and advertising identifiers. We use this information to optimize our Site for our users’ use. If, however, you choose to browse the Internet anonymously or opt-out, we will not collect technical or routing information about your device.

#### Cookies & Web Analytics

Cookies are small text data files that are sent to and stored on your computer, smartphone or other device for accessing the internet whenever you visit a website. Cookies are useful because they allow a website to recognize a user's device. At First American, we use cookies from our website in two ways:

1. To analyze how you use our website so we can make our website better and to determine your likes and dislikes to help us improve your experience when using our website.
2. To enable our website to perform for you as you expect, such as to log on to a secure area of the website.

You can find out more about cookies on [www.allaboutcookies.org](http://www.allaboutcookies.org).

In addition to the general uses described above, we use cookies, as allowed by law, for purposes such as: account servicing; communicating with you; improving our website, products, or services; marketing or personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, page interactions, and the length of user sessions in order to evaluate the usefulness of our sites.

Our analytics service providers are bound by obligations of confidentiality to protect your personal information. We do not share analytics information about you with third parties other than as stated in our Policy. If we provide links to third party websites, remember that they have their own privacy and cookie policies that govern the use of information you submit.

The browsers of most computers, smartphones and other internet access devices are set up to accept cookies. You may change your acceptance of cookies through your browser settings. Your browser's "help" function will tell you how to do this.

We do not separately maintain a listing of Site visitors who do not wish to accept cookies. You, as a visitor to our Site, must set your browser to reject cookies to allow our Site not to track your use of our Site.

Please remember that if you choose to disable cookies, you will likely affect how our website works for you and you may no longer be able to access all or parts of the website.

## Google Analytics

The following Google Analytics Advertising Features have been implemented on our website:

- ✓ Demographics and Interest Reports

You may opt-out of the Advertising Features on this website by using the Google Analytics Opt-out Browser Add-on available here: <https://tools.google.com/dlpage/gaoptout/>.

## **Children Under the Age of 16**

We do not knowingly collect information from children under the age of 16. Our website is not directed at persons under the age of 16 and should not be used by them. In no event should young persons provide any personal information through our website. More information about the Children's Privacy Protection Act (COPPA) and how it protects children who use the Internet may be found at [www.ftc.gov](http://www.ftc.gov).

## **About the Data We Collect Generally**

### **Other Information We Collect**

As part of our service, when you visit our websites, our server automatically collects certain browser or device-generated information, including but not limited to: your Internet service provider; your IP address; the date, time and duration of your visit; your browser type; your operating system; and your page visits. We may de-identify and aggregate certain data we collect such that the data no longer identifies or can be linked to a particular visitor to our Site in order to analyze trends and make improvements to our websites to provide you with optimal online experiences with us. First American will not attempt to re-identify any de-identified and aggregated data it collects and maintains.

Use of our FA Experience and My Finance Advantage platforms require the submission of personal data to complete the application process. You are in control of and responsible for the data submitted through the platforms, including personal information. By choosing to engage with our services in this manner, you authorize us to obtain additional personal information from third parties such as credit bureaus.

We retain your information for as long as such retention is necessary for our business purposes, such as providing services to you or your company, maintaining system backups, or record retention as required by law or otherwise.

## **Use of Personally Identifiable Information**

We may use (and, where specified, disclose) your personal information for the following purposes:

### **Communication**

When you contact us, we may use personal information (like your e-mail address) to reply and provide you with the services or information you requested. We may use your phone number to call or send text messages regarding our services and any transactions we

may have with you. We also may use your personal information to collect feedback on our Site and policies.

## Site Improvement

We reserve the right to use your personal information and browsing behavior to personalize our Site and improve the overall user experience. We also may use personal information to evaluate response rates or gauge the usability of the Site.

## Protect Content

In order to stop malicious, deceptive, fraudulent or illegal activity from occurring on our website, we may use identifying information to monitor users' behavior on the Site. Our attempts to prevent malicious, deceptive, fraudulent, or illegal Internet activity may cause some users to be suspended from the Site and its features.

## Data Rights

Subject to applicable law, you may have the right to request and obtain information about, or copies of, your personal information that we process, where we obtained your information, the business or commercial purpose for collecting your information, and the third parties with whom your information is shared. Lastly, you may ask us to delete personal information that we have collected from you, depending on the situation and applicable laws.

All of our processing is in support of our business.

Residents of California may have the following rights with respect to their personal information, in certain circumstances:

- ✓ The right to know the categories and specific pieces of personal information we have collected about you in the past 12 months, the sources from which the personal information was collected, the categories of third parties to whom First American discloses the personal information, and the business purpose for collecting such information;
- ✓ The right to request a copy of the specific pieces of personal information we have collected about you in the past 12 months;
- ✓ The right to request that we delete the personal information that we have collected from you, in certain circumstances; and
- ✓ The right not to receive discriminatory treatment for the exercise of your privacy rights.
- ✓ The right to limit use of "sensitive personal information." We note that FAEF collects and processes a very limited amount of sensitive personal information.

California residents may make a request to exercise these rights by contacting us at (800) 801-3830 or by e-mailing us at [privacy@faef.com](mailto:privacy@faef.com). Currently, much of the personal information that

FAEF collects is not subject to the rights noted above, but it may be in the future. If that occurs, we will provide you relevant notice in a revised Privacy Policy.

Upon receipt of a request to exercise your rights, we may request additional information in order to verify your identity. To the extent possible, we will utilize information already in our possession to verify your identity. Any information you provide in connection with such verification will be deleted as soon as practicable following your request.

We will confirm receipt of a request within ten (10) days of receipt of such request. We will then endeavor to respond to a verifiable request within forty-five (45) days of its receipt. We may deny the request if we are unable to verify your identity within this forty-five (45) day period. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will cover the 12-month period preceding the verifiable request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

You may designate an authorized agent to make a request on your behalf. If you submit a request through an authorized agent, we may require that the authorized agent provide proof that the authorized agent has been authorized by you to act on your behalf and may still require you to verify your identity in accordance with the above.

The chart below summarizes our practices in relation to your personal information over the preceding 12 months.

<b>Category of Information Collected</b>	<b>Source of Information</b>	<b>Purpose for Collection</b>	<b>Third Parties to whom Information is Disclosed</b>
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name or other similar identifiers.	You, your company, and/or your use of our website	To contact you; provide you or your company, or other FAEF clients, with goods, services, or information you or your company request; or to make our products and services better	We may, on a selective and confidential basis, share appropriate information with another company in the First American family if your trusted advisor believes that company has marketing information on a product or service that might interest you. We may also share select information when you expressly request that we provide you with certain products and services that are available through one of our companies.

			We also disclose your information to service providers, such as cloud computing providers, to allow FAEF to conduct its business.
Other identifiers such as signature, telephone number, credit card number, or debit card number	You, your company, and/or your use of our website	See above	See above
Commercial information, including records of products or services purchased, obtained or considered	You, your company, and/or your use of our website	See above	See above
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with the Site, an application, or advertisement	You, your company, and/or your use of our website	See above	See above
Inferences we draw from any of the information identified above to create a profile about you reflecting your preferences	You, your company, and/or your use of our website	See above	See above

## Information Disclosure

We may need to disclose your personal information occasionally. Most of our disclosures are necessary to complete a transaction or provide the information or service you have requested. In addition to this, we may disclose your information if needed to comply with a court order, law, legal proceeding, or request from the government. We also reserve the right to disclose your information if we have the reasonable belief that such disclosure is fundamental to the safety of individuals associated with FAEF or others unaffiliated with the company, or to report or investigate fraud or a crime.

We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use

reasonable efforts to require that the transferee use personal information provided through this web site in a manner that is consistent with this Privacy Policy.

FAEF does not and will not sell your personal information. FAEF does not and will not sell the personal information of a California resident it has actual knowledge is under the age of 16. We do not share your personal information with any non-affiliated third party for targeted advertising purposes.

## **Security**

FAEF makes the protection of client information a very high priority. To protect the confidentiality of our clients' financial activities recorded on our systems, we use technology to update and test our computer networks regularly. Our goal is to ensure we maintain commercially reasonable administrative, technical, and physical measures to secure your privacy.

## **Identifying Authorized Users**

Our systems ensure that your password and other access credentials are private and confidential. For your protection, outside of manual password resets, only you know your access credentials. Our employees do not have access to client/colleague created passwords, and they will not ask you to reveal them.

## **Contact Us**

If you have any questions or concerns about these policies, or how FAEF protects your personal data, please feel free to contact: [mail@faef.com](mailto:mail@faef.com).