

# California Consumer Privacy Notice

## IMPORTANT PRIVACY CHOICES FOR CONSUMERS

**Please read the following information carefully before you make your choices below.**

This California Consumer Privacy Notice ("Privacy Notice") applies to Associated Banc-Corp and its affiliates (collectively, "we," "our," or "us") and is effective beginning on July 1, 2024. Please note that some of our affiliates may provide a separate privacy notice, in which case that notice will apply to your personal information as well. We adopt this Notice to comply with the California Consumer Privacy Act of 2018 and, as amended, the California Privacy Rights Act of 2020.

We are required under the California Consumer Privacy Act ("CCPA") to provide this Privacy Notice to natural persons who are a California resident ("consumer"). The term "resident," as defined in Section 17014 of Title 18 of the California Code of Regulations, includes (1) every individual who is in the State for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the State who is outside the State for a temporary or transitory purpose.

Accounts with a California mailing address are automatically treated as if they have limited the sharing of their personal information with our affiliates. For more information on our general privacy practices, please refer to our privacy policy found on [AssociatedBank.com/Security/Privacy](https://AssociatedBank.com/Security/Privacy).

## INFORMATION WE COLLECT

To provide consumers with products or services that they request from us, we collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("Personal Information").

Personal Information does not include and is not covered by this Privacy Notice under the following circumstances:

- Information that is lawfully made available from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
  - Personal information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations, or the California Financial Information Privacy Act (Division 1.4 (commencing with Section 4050) of the Financial Code).
  - Activity involving the collection, maintenance, disclosure, sale, communication, or use of any personal information bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency, a furnisher of information who provides information for use in a consumer report, or by a user of a consumer report, as set forth in the Fair Credit Reporting Act (15 U.S.C. Sec. 1681 et seq.).
  - Protected health information that is collected by a covered entity or business associate pursuant to the Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191) and the Health Information Technology for Economic and Clinical Health Act (Public Law 111-5).

In the preceding 12 months, we have collected the following categories of Personal Information from consumers:

<b>Categories of Personal Information We Collect</b>	<b>The Categories of Sources From Which the Personal Information is Collected</b>	<b>The Business or Commercial Purpose(s) for Which the Information is Collected, Used, and/or Disclosed</b>	<b>The Categories of Third Parties With Whom we Disclose Personal Information</b>
<b>Identifiers.</b> This may include a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us, and to provide advertising or marketing services to you.	Government Entities, as required by federal or state data reporting requirements.
<b>Personal Information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).</b> This may include a name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us, and to provide advertising or marketing services to you.	Government Entities, as required by federal or state data reporting requirements.
<b>Characteristics of Protected Classification under California or Federal Law.</b> This may include age, race, national origin, citizenship, marital status, sex, veteran or military status.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us, and to provide advertising or marketing services to you.	Government Entities, as required by federal or state data reporting requirements.
<b>Internet or other similar network activity.</b> This may include information on a consumer's interaction with a website, application, or advertisement.	You, your agents, or through our service providers.	To provide you with information, products, or services that you request from us.	We don't disclose to third parties.

<b>Geolocation data.</b> This may include physical location or movements.	You, your agents, or through our service providers.	To provide you with information, products, or services that you request from us.	We don't disclose to third parties.
<b>Professional or employment-related information.</b> This may include current or past job history.	You, your agents, government entities from which public records are obtained, or through our service providers.	To provide you with information, products, or services that you request from us.	Government Entities, as required by federal or state data reporting requirements.

We may collect Personal Information from you through phone, mail, email, fax, ATM, in-person, website, or mobile application interactions you have with us or our service providers. The information collected may vary depending upon what specific products or services you are requesting or obtaining from us. We will not collect additional categories of Personal Information or use Personal Information collected for additional purposes without providing you with notice and, if applicable, an opportunity to provide consent for the new use.

## DISCLOSURE OF INFORMATION

We may disclose your Personal Information to our service providers to perform a business or commercial purpose, such as to: maintain or service accounts, provide customer service, process payments, provide financing, provide advertising or marketing services, provide analytic services, or provide similar services on our behalf. If we disclose your Personal Information to a service provider, we do so pursuant to a written contract that prohibits the service provider from retaining, using, or disclosing the Personal Information for any purpose other than for the specific purpose of performing the services specified in the contract, or as otherwise permitted by the CCPA.

In the preceding 12 months, we have disclosed the following categories of Personal Information to our service providers for a business or commercial purpose:

- Identifiers
- Personal Information categories listed in Cal. Civ. Code § 1798.80(e)

We have not “sold” or “shared” (as defined by the CCPA) consumer Personal Information to third parties purpose in the preceding 12 months. We do not and will not “sell” or “share” your Personal Information, this would include not “selling” or “sharing” Personal Information of minors under 16 years of age.

## DATA RETENTION

We will not store your personal information longer than necessary for the purpose for which we have processed your personal information. How long we retain your personal information depends on the type of personal information and the purpose for which we process your personal information. The criteria used to determine retention timeframes include, but are not limited to:

- The duration of your ongoing relationship with Associated Bank in which we provide services to you.
- Whether there is a legal obligation to which we are bound to comply with retention requirements

(Certain laws, rules and regulations which require us to keep records of your transactions for a certain period of time before deleting); or

- Whether retention is advisable in light of our legal position (such as information subject to related litigation, statutes of limitations or regulatory inquiry).

## **YOUR RIGHTS**

The CCPA provides consumers with specific rights regarding the collection, use, disclosure, and sale and sharing of their Personal Information. This section describes your rights under the CCPA and how to exercise those rights.

### Right to Know About Personal Information Collected or Disclosed

You have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you, if applicable:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information.
- Our business or commercial purpose for disclosing the category of Personal Information about you.
- The specific pieces of Personal Information we collected about you.

If we disclosed your Personal Information for a business purpose, we will also disclose:

- The categories of Personal Information that we disclosed about you; and
- The categories of third parties to whom your Personal Information was disclosed, by category or categories of Personal Information for each third party to whom the Personal Information was disclosed.

### Right to Request Deletion of Personal Information

You have the right to request that we delete any Personal Information about you we have collected and maintained. Subject to certain exceptions, we will delete your Personal Information from our records, and direct our service providers to delete your Personal Information from their records, if we receive a verifiable consumer request from you to do so.

We may deny your deletion request if it is necessary to retain your Personal Information to:

- Complete the transaction for which your Personal Information was collected, provide a good or service you requested, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract you've executed with us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity.
- Debug or identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Non-Discrimination:

We will not discriminate against you for exercising any of your rights under the CCPA, including, but not limited to, by:

- Denying goods or services to you.
- Charging different prices or rates for goods or services to you, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services to you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Right to correct:

You have the right to request the correction of inaccurate personal information.

Do-Not-Sell or Share Rights:

California Residents have the right to opt-out of the sale or sharing of their personal information by us. As noted above, we do not currently “sell” or “share” personal information about California residents, including those that we know to be under 16-years-old.

## YOUR CHOICES

**To exercise rights under the CCPA, please submit a request by any of the following methods:**

- Call our Midwest-based We Care team at 800-685-6895.
- You may submit them online by completing the form at: [AssociatedBank.com/CAPrivacy](https://AssociatedBank.com/CAPrivacy)
- In-person at one of our branch locations.

To be a verifiable consumer request, the request must be made by you or a person registered with the Secretary of State that you authorize to act on your behalf (“authorized agent”). If you chose to use an authorized agent to submit a request on your behalf, you must provide the agent written permission to do so and the agent must verify their own identity directly with us. If the agent does not submit proof that they have been authorized by you to act on your behalf, we may deny the request. You may also make a verifiable consumer request on behalf of your minor child. In order to process your request, you or your authorized agent will need to provide us with the following information:

- Your first and last name
- Your mailing address
- Your date of birth

- Your phone number
- Your email address

We cannot fulfill your request or provide you with Personal Information if we are unable to verify your identity and confirm the Personal Information that we've collected about you. To verify your identity, we match the identifying information provided with your request to your Personal Information we already maintain, and we may contact you at the number you provide to us.

## **RESPONSE TIME**

We will confirm receipt of a verifiable consumer request within 10 days and provide information about how we will process the request—except in instances where we have already granted or denied the request. Generally, we will respond to your request, free of charge, within 45 days of its receipt. However, if we require additional time to evaluate and fulfill your request, we will inform you of the reason and extension period (up to 90 days), in writing, within the initial 45-day period. We will deliver our written response to you by mail or electronically, in accordance with the option you select. If a disclosure of your Personal Information is provided, it will only cover a period of 12 months preceding the date of your verifiable consumer request. If applicable, the response we provide to you will explain the reasons we cannot fulfill your request and any rights you may have to appeal the decision.

We do not charge a fee to process or respond to your verifiable consumer request. Pursuant to the CCPA you are entitled to request your Personal Information up to twice in a 12-month period.

## **CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to amend this privacy notice at our discretion and at any time. The California privacy notice will be reviewed at least once every 12 months and will reflect the date it was last updated.

## **CONTACT FOR MORE INFORMATION**

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under the CCPA, please contact us at:

Phone: 800-685-6895

Website: [AssociatedBank.com/CAPrivacy](https://AssociatedBank.com/CAPrivacy)

