



CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

Effective Date: January 1, 2020

Date of Last Update: December 31, 2019

Introduction

TriState Capital Bank (collectively, “we,” “our,” “us,” “TSCB”) is committed to protecting the privacy of personal information of individuals. This Privacy Disclosure supplements the information contained in the Privacy Disclosure of TSCB and its subsidiaries and applies solely to residents of the State of California (“consumers” or “you”). TSCB has adopted this Disclosure to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended. Any terms defined in the CCPA have the same meaning when we use them in this Disclosure.

Under the CCPA, ‘Personal Information’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. Personal Information under the CCPA does not include (i) Publicly available information from government records; (ii) De-identified or aggregated consumer information; or (iii) Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA) and the personal information collected that is subject to the Gramm-Leach-Bliley Act (“GLBA”). As an example, if a California resident applies for or obtains a financial product or service from for personal, family, or household purposes, the information would be subject to the GLBA and the Privacy Disclosure of TSCB would apply ([Click here to view policy](#)).

One of TSCB’s top priorities is to keep Personal Information secure. Consistent with our obligations under applicable laws and regulations, we maintain safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Collection and Disclosure of Personal Information

In the past 12 months, we have collected, and may have disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure: (Note: We may not collect all information in the categories listed below)

- Identifiers, such as name and government-issued identifier (e.g., Social Security number);
- Personal information, as defined in the California safeguards law, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as transaction information and purchase history;

- Internet or network activity information, such as browsing history and interactions with our website;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Audio, electronic, visual and similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

The categories of sources from whom we may have collected this Personal Information are:

- Directly from a California resident or the individual's representatives
- Service Providers, Consumer Data Resellers and other third parties
- Public Record Sources (Federal, State or Local Government Sources)
- Information from our Affiliates
- Website/Mobile App Activity/Social Media
- Information from Client Directed Third Parties or Institutions representing a Client/Prospect
- Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member)

The categories of third parties to whom we may have disclosed Personal Information for our business purposes described in this Disclosure are:

- Affiliates and Subsidiaries of TSCB
- Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing and marketing research activities
- Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers and other prospective buyers
- Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, vehicle loan processes and aggregators (at the direction of the customer)
- Government Agencies as required by laws and regulations

Use of Personal Information

TSCB may use or disclose the personal information we collect about California consumers for one or more of the following business purposes:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, perform actions reasonably anticipated within the context of a TSCB's ongoing business relationship with the consumer, or otherwise perform a contract between us and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.

- Debug to identify and repair errors that impair existing intended functionality.
- To perform activities that will secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide support and respond to inquiries, including investigation of concerns.
- Comply with the California Electronic Communications Privacy Act.
- Performing services, including maintaining or servicing accounts, providing customer service, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services.
- For testing, research, product development, analysis, including to develop and improve our website, products and services.
- Undertaking internal research for technological development and demonstration.
- 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, codes or opinions).

Sale of Personal Information

In the preceding twelve (12) months, we have not sold any personal information.

Rights under the CCPA

If you are a California resident, you have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - a. the categories of Personal Information about you that we collected;
 - b. the categories of sources from which the Personal Information was collected;
 - c. the purpose for collecting Personal Information about you;
 - d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 - e. the specific pieces of Personal Information we collected about you;
2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
3. Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond to your request if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

There may be instances when we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to

make a request on behalf of another individual. Additionally, we will not 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 the CCPA's access or deletion rights.

If we are not able to honor your request, we will advise you in our response to you. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or 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 work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

How to Exercise Your Rights

If you are a California resident, you may submit a request by:

- Submitting a request through our website (www.tscbank.com) by clicking the "Contact Us" button in the upper right of the homepage and completing the form under the "Email Us" section; or
- Calling us at 877-304-0304.

You may contact us with questions or concerns about this Disclosure and our practices by:

- Writing us at: TriState Capital Bank, Attn: Risk and Compliance Group – Privacy Officer, 301 Grant Street, Suite 2700, Pittsburgh, PA 15219
- Emailing us at: privacyofficer@tscbank.com

Changes to Our Privacy Notice

We reserve the right to amend this Disclosure from time to time. The revised Disclosure will be placed on this page and will have "Date of Last Update" date on it.