

WESTAMERICA BANK
CALIFORNIA CONSUMER PRIVACY ACT
EMPLOYEES/JOB APPLICANTS

NOTICE AT COLLECTION OF PERSONAL INFORMATION

This notice is provided, as required by the California Consumer Privacy Act of 2018 by Westamerica Bancorporation and its subsidiaries that either: (1) act as a business within the meaning of the CCPA, or (2) are controlled by Westamerica Bancorporation and use the Westamerica name, for example, Westamerica Bank, Community Banker Services Corporation and Westamerica Mortgage Company, (collectively “Westamerica”). Westamerica must gather personal information about you during the job application process and/or due to your employment relationship with Westamerica. This notice applies solely to job applicants and employees who reside in the State of California. The following personal information about you is collected by Westamerica for the following purposes, and if stated, shared with our vendors or government entities.

To view our California Consumer Privacy Act Policy, go to www.westamerica.com/about/privacy.

Categories of Personal Information to be Collected

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”). In particular, we have collected the following categories of personal information from job applicants and/or employees within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver’s license photograph/number, passport number, documents required to complete Form I-9, or other similar identifiers, such as employment history or education history.	YES
B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristic or description, address, telephone number, passport number, driver’s license or state identification card number, permanent resident card, names, addresses, email addresses and telephone numbers of references, insurance policy number, education, employment, employment history, employee identification number assigned to you by Westamerica, wages earned and hours worked, bank account number, ATM/Debit/Credit Card number, or any other financial information, emergency contact person name, email address and their phone number(s), medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected Classification Characteristics Information.	Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition(s), physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status or other information related to characteristics of protected classifications under state or federal law.	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO

Category	Examples	Collected
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or information related to the measurement or analysis of unique or behavioral characteristics.	YES
F. Internet or Other Similar Network Activity.	Browsing history, search history, and interaction with a website, while at the workplace.	YES
G. Geolocation Information.	Information or data related to a physical location or movements.	YES
H. Sensory Information.	Audio, visual, electronic, thermal, olfactory, or similar information, such as video taken inside our branches and offices, or voice messages.	YES
I. Professional or employment-related information.	Current or past job history, including the names of employers, positions held, tenure with those employers, periods of unemployment or self-employment, potential and job responsibilities held during your employment, performance evaluations and any disciplinary process documentation including reason(s) for work performance discipline.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Personally identifiable education information that is not publicly available, such as grades, class lists, student schedules, student identification codes, student financial information or transcripts.	NO
K. Inference Information.	Inferences drawn from any other category of Personal Information to create a profile about an individual reflecting potential or probable preferences, characteristics, psychological trends, behavior, abilities, intelligence, attitudes, aptitudes or other similar predispositions.	YES
L. Information used to Reimburse you for Interview and/or Business Employment- related Expenses	Dates and destinations of your travel away from your assigned work location for work related purposes or to travel to and from one of our locations for an in-person interview; miles you drove your personal vehicle on dates traveling away from your assigned work location for work related purposes or to travel to and from one of our locations for an in-person interview; forms of transportation you used, including but not limited to your personal vehicle, airplanes, taxis, buses, and ferries, on dates traveling away from your assigned work location for work related purposes or on the date of your in-person interview; hotels in which you resided when traveling away from your assigned work location for work related purposes or on the date of your in-person interview; detailed listings of food and drinks you consumed on dates traveling away from your assigned work location for work related purposes or on the date of your in-person interview and the amount of business related expenses for which you were reimbursed (shared with FIS).	YES

Category	Examples	Collected
M. Information Used to Communicate and Accept an Offer of Employment	Position description, potential hiring date, required training and possible travel requirements, assigned supervisor's name and a possible receipt of a tentative offer of employment which includes your acknowledgment that you will comply with Westamerica's personnel policies and undergo a background check.	YES

Westamerica uses additional personal information when an employee's job duties or an employee's participation in benefit programs requires such information. If your assigned job duties require any of the following activities or you participate in certain employee benefit transactions or programs, the following personal information must be used by Westamerica for administrative purposes:

- **Salary Deferral and Matching Contribution to the 401(k) / ESOP Plan**
 - The dollar amount of your salary deferral and each Westamerica matching contribution to your account in the 401(k) / ESOP Plan (shared with ADP and Vanguard¹).
- **Contribution to the Deferred Profit-Sharing Plan**
 - The dollar amount of each Westamerica contribution to your account in the Deferred Profit-Sharing Plan (shared with Vanguard¹).
- **Contributions to Health Savings Accounts**
 - The amount of your and Westamerica's contributions to your Health Savings Account (shared with ADP, Optum, SmartBen, IRS and FTB¹).
- **Pre-tax Flexible Spending Benefits for Dependent Care and Medical Care**
 - The amount of your per-pay period and annual contribution to flexible spending accounts for dependent care and medical expenses (shared with ADP, Optum, SmartBen, IRS and FTB¹).
- **Star Performer Awards, Employee of the Month Awards, Employee Service Awards or Stock Option Benefits**
 - The number of shares and cost basis of Westamerica Bancorporation common stock received by you from Westamerica's award recognition programs and stock option plan benefits (shared with your designated stockbroker or custodian).
 - The taxable value of Westamerica Bancorporation common stock received by you from Westamerica's award recognition programs and stock option plan benefits (shared with ADP¹).
- **Employee Referral Awards, and bonuses and incentives earned under Westamerica's incentive plans**
 - Employee referral awards and cash incentives earned (shared with ADP¹).
- **Access Badge, if applicable**
 - Your photograph
 - Westamerica assigned badge number
- **Westamerica assigned e-mail address and personal work phone**
 - Your name.
 - Work e-mail address.
 - Work phone number.
- **Employee loan from 401(k) / ESOP Plan account**
 - The number of loans you have outstanding from your account in the 401(k) / ESOP plan (shared with ADP and Vanguard¹).
 - The amount of per pay period deductions from your pay representing loan payments for such loan(s) (shared with ADP and Vanguard¹).
- **Employee financial hardship withdrawal from 401(k) / ESOP Plan account**
 - Financial records documenting your financial hardship which qualifies you for a hardship withdrawal.
 - Amount of your hardship withdrawal (shared with Vanguard¹).

¹ Denotes a custodial vendor for employee accounts.

- **Garnishment of Your Wages**
 - The cause and amount of any garnishment of your wages communicated to Westamerica by a federal, state or local governmental authority or a court of competent jurisdiction.
- **Employee operation of Westamerica owned vehicles**
 - Driver's license number.
 - Birth date.
- **Workers Compensation Claim**
 - The name and contact information for your claims manager.
 - The name and contact information of the doctor(s) and other specialist(s) evaluating your injury and providing treatment.
 - The actual costs of your treatment and estimated costs of future treatment(s).
 - The expected duration of your treatment.
 - If you are represented by an attorney, the contact information of your attorney.
 - If you are represented by an attorney, Westamerica may subpoena your prior medical records.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from consumers or their agents. For example, from documents that our consumers provide to us related to the services for which they engage us.
- Indirectly from consumers or their agents. For example, through information we collect from our consumers in the course of providing services to them.
- Directly and indirectly from activity on our website. For example, submission through our website portal or website usage details collected automatically from third parties that interact with us in connection with verifying employment history.
- From third parties that interact with us in connection with the services we perform. For example, the Employment Development Department, Workers Compensation Insurer(s), insurance brokers, and public and private entities providing background checking service.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to pay wages, we will use that information to prepare the paycheck and submit certain information to the applicable taxing authorities or if you provide us with personal information in order for us to reimburse you for mileage when traveling to and from your in-person interview.
- To communicate with you during the interview and hiring process to, if applicable, extending an offer of employment, information, such as your representation that you are eligible to legally work in the United States of America and other information you may provide during the recruiting and interview process such as education history and other career development action you have taken or any standardized test Westamerica may require you to complete to validate your skill level or determine if there is a match with Westamerica's sale culture.
- To provide you with information related to your employment or job search, products or services that you request from us.
- To carry out our obligations and enforce our rights arising from your employment or candidacy for employment.
- As necessary or appropriate to protect the rights, property or safety of us, our customers or others.

- To determine whether you have any criminal records which will disqualify you from employment with Westamerica under Federal banking laws.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To comply with the United States Government Reporting Requirements, such as completion of a federal I-9 form validating your legal right to work in the United States of America or to comply with the annual completion of an Affirmative Action Plan (gender, race, ethnicity, veteran status and if you disclosed a disability).
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification Characteristics Information under California or federal law.
- Category I: Professional or employment-related Information.
- Category L: Information Used to reimburse you for Interview and/or Business Employment-related Expenses.
- Category M: Information Used to Communicate and Accept an Offer of Employment.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

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

The above represents the California Consumer Privacy Act of 2018 disclosure of personal information collected about you due to your prospective and/or employment relationship with Westamerica. For purposes of any banking products or services you have with Westamerica Bank, this represents a customer relationship on your part with Westamerica Bank, which has separate disclosure responsibilities under the California Consumer Privacy Act of 2018.