


CALIFORNIA CONSUMER PRIVACY ACT POLICY

Your Privacy is Westamerica’s Priority

Westamerica Bancorporation and its subsidiaries, Westamerica Bank and Community Banker Services Corporation (collectively “Westamerica”), work diligently to safeguard the privacy and maintain the confidentiality of our customers, employees, officers, directors, contractors, and others with regards to their “Personal Information” and financial records, consistent with state and federal laws. This Policy explains how Westamerica collects, uses, and discloses Personal Information relating to California residents covered by the California Consumer Privacy Act of 2018 (“CCPA”). We want you to understand what information we collect and how we use it. In addition, we want you to know about important rights you have under the CCPA with regard to your “Personal Information.” The following explains our policies regarding the use and protection of your “Personal Information.”

Keeping your Personal Information secure is one of our most important priorities. Consistent with our obligation under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational 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.

Personal Information is defined under the CCPA to include any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household. Examples include: Social Security numbers, account numbers, address information, and telephone numbers. The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with the individual.

The CCPA does not apply to Personal Information that is either exempted or not covered by the CCPA, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”) or its implementing regulations (for example, information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes). For more information about how we collect, disclose, and secure information under the GLBA, refer to our Privacy Policy.

Your Right to Know About Personal Information Collected, Disclosed, or Sold

A consumer, which includes customers, employees, officers, directors or contractors of Westamerica as well as those who have applied to be considered for employment at Westamerica, has the right to request that we disclose to them what Personal Information we collect, use, disclose or sell.

Below is a list of categories of Personal Information we have collected about consumers in the preceding 12 months:

Category	Examples
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.



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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 phone number(s), medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected Classification Characteristics Information under California or Federal Law	Age, 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 information, veteran or military status, or other information related to characteristics of protected classifications under state or federal law.
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
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, voice prints, iris or retina scans, keystroke, gait, or information related to the measurement or analysis of unique physical or behavioral characteristics.
F. Internet or Other Similar Network Activity	Browsing history, search history, or information on a consumer’s interaction with a website or while at our workplace.
G. Geolocation Information	Information or data related to a physical location or movements.
H. Sensory Information	Audio, visual, electronic, thermal, olfactory, or similar information, such as video taken inside our branches and offices, or voice messages.
I. Professional or Employment-related Information	Professional or employment-related information about current, past, and prospective employees of Westamerica, including identifier information, protected class information, performance evaluations, commercial, network activity, audio, electronic, visual and other professional, and employment-related information.



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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.
K. Inference Information	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
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.
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.
N. Sensitive Personal Information	Personal information that reveals: a consumer’s social security number, driver’s license or state identification card number, or passport number; a consumer’s account log-in, financial account, ATM/Debit/Credit Card number in combination with any required security or access code, password, or credentials allowing account access; a consumer’s precise geolocation, genetic data, biometric and health information, racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer’s mail, email and text messages, unless the Bank is the intended recipient of the communication; information regarding a consumer’s sex life or sexual orientation.

Collection of Personal Information

Westamerica collects Personal Information directly from you, or an authorized agent or family member; service providers and other third-parties (e.g., credit bureaus, your educational institutions, prior employers, Workers Compensation Insurers); directly and indirectly from activity on our online banking platform or mobile app, which may include your service providers and persons with whom you perform transactions; and/or government agencies and other publically available sources.

Use and Disclosure of Personal Information

Westamerica may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To vendors and service providers that provide services such as website hosting, data analysis, payment and transaction processing, email delivery, auditing, marketing, check order fulfillment, and customer service.
- To provide you with information, products, loans or services that you request from us or related to your employment or job search, including maintaining or servicing accounts, enhancing our products and services, verifying customer identity, or providing similar services.
- For operational, commercial, quality assurance, security, compliance, and audit purposes.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to prosecute those responsible.
- To carry out our obligations and enforce our rights arising from your employment or candidacy for employment.
- Audio and network activity information regarding calls, which may or may not include other personal information. This information is used to respond to requests and inquiries, prevent fraud, and comply with legal and regulatory obligations.
- Video inside our branches and offices is used for security, to resolve disputes, comply with legal and regulatory obligations, and to prevent fraud.
- For employment-related purposes such as hiring, payroll, employment benefits and similar purposes.
- To comply with the 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).
- To third-parties that provide services such as banking infrastructure, online/mobile banking, data storage, credit reporting agencies, outside legal counsel, tax advisors, notaries, appraisers, and others supporting the delivery of Westamerica's products and services to our customers.
- 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 comply with lawful requests for information from law enforcement, regulators, judicial authorities and court-appointed trustees, supervisors, and other third-parties pursuant to subpoenas or document requests.

Westamerica may also disclose your information to a third-party to enforce our agreements and policies (including billing and collections), to protect the security or integrity of Westamerica, its services and assets, to protect customers or the public from harm or illegal activities, to respond to an emergency which we believe reasonably requires us to disclose information to assist in preventing death or serious bodily injury, or, with your prior consent, to any other third-party.


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In the preceding 12 months, we have disclosed information about consumers to third-parties for a business purpose. The categories of Personal Information we have disclosed during that period of time include the following:

Category A:	Identifiers
Category B:	Personal Information Categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))
Category C:	Protected Classification Characteristics under California or Federal Law
Category D:	Commercial Information
Category E:	Biometric Information
Category F:	Internet or Other Similar Network Activity
Category G:	Geolocation Information
Category H:	Sensory Information
Category I:	Professional or Employment-related Information
Category 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))
Category K:	Inference 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
Category N:	Sensitive Personal Information

Sale of Personal Information

Westamerica does not currently sell Personal Information. For purposes of this policy, “sale” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration. If Westamerica decides to sell the Personal Information of California residents, we will provide notice and the opportunity to opt-out. By default, California residents Westamerica knows to be under 16 years of age would be opted-out of the sale of their Personal Information.

Right to Request Correction of Personal Information

You have the right to request the correction of any Personal Information about you which we have collected or maintained.

Right to Request Deletion of Personal Information

You have the right to request the deletion of any Personal Information about you which we have collected or maintained.

Not all personal information is eligible to be deleted. For example, Westamerica may retain Personal Information in order to:

1. Complete transactions or services for which the information was collected or reasonably anticipated, or to provide a service requested by you;
2. Detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity and prosecute those responsible for such activity;
3. Debug or identify errors;
4. Exercise free speech, or allow other consumers to do the same;
5. Comply with certain sections of the California Electronic Communications Privacy Act;
6. Engage in certain types of research where the consumer has provided informed consent;
7. Enable solely internal uses reasonably aligned with consumer expectations;
8. Comply with a legal obligation; or
9. Otherwise use it internally in a lawful manner that is compatible with the context in which the consumer provided the information.

Right to Non-Discrimination for the Exercise of Your Privacy Rights

You have a right not to receive discriminatory treatment by us for the exercise of any privacy rights conferred by the California Consumer Privacy Act (California Civil Code §1798.100 et seq.)

Links

Westamerica's website may contain links to other third-party sites that are not governed by this policy. If you click on a link to a third-party site, you will be directed to a site we do not control. We are not responsible for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully.

Authorized Agent

You may designate an authorized agent under the California Consumer Privacy Act to make a Verifiable Consumer Request ("request") to know, request to delete, or request to correct on your behalf by sending written authorization with your original signature to our address at: Westamerica Bank, CCPA MAC B-2N, P. O. Box 1200, Suisun City CA 94585. Unless the written authorization is a valid power of attorney created pursuant to California law, we will also require you to provide us with your name, address, and other information about you, your accounts, or transactions that we can use to match with the information we have on file. The amount and type of information we request may vary depending on the sensitivity of personal information covered by the request.

How to Exercise Your Rights or Contact us for More Information

If you wish to contact us to submit a Verifiable Consumer Request to Know, Request to Delete, or Request to Correct under the California Consumer Privacy Act of 2018, subject to certain exceptions outlined in the CCPA, or you have any questions, comments or concerns with respect to our privacy practices or this California Consumer Privacy Act Policy, contact as follows:

- Call us at 1-800-848-1088
- Visit us at <https://www.westamerica.com/ccpa> and complete the online CCPA Information Request form.

Once you have submitted a request, we will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. In order to verify your identity we will request specific pieces of information to compare against our records. We may ask you to describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Only you or a person ("Authorized Agent") that you authorize to act on your behalf, may make a Verifiable Consumer Request, as defined in the CCPA, related to your Personal Information. You may also make a Verifiable Consumer Request on behalf of your minor Child.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We will not honor your request where an exemption 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, deletion or correction rights. We will advise you in our response if we are not able to honor your request. We will not provide Social Security numbers, driver's license numbers or government-issued identification numbers, financial account 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.

**WESTAMERICA BANK**
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Making a Verifiable Consumer Request does not require you to create an account with us. We will only use Personal Information provided in a Verifiable Consumer Request to verify the requestor's identity or authority to make the request.

We commit to respond to a Verifiable Consumer Request within 45 days of its receipt. If we require more time (up to a total of 90 days), we will inform you of the reason and extension period in writing.

Changes in Policy

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. When these changes occur, we will also post an updated copy on www.westamerica.com and change the Revision ("REV") date. Check our website periodically for updates.