



CROSSFIRST BANK®

California Consumer Privacy Policy and Disclosure

This Privacy Policy describes how CrossFirst Bank (collectively, "CrossFirst," "we," "us," or "our") collects, uses, shares, and safeguards personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. Note that this privacy policy relates to information not subject to the federal Gramm Leach Bliley Act, please see our [GLBA Privacy Notice](#). You can jump to particular topics by going to the headings below:

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Types Of Information We Collect

The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration	We collect your name and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We use this information to provide account related functionalities to our users. Accounts can be used to view your account history, and to save your preferences and transaction history.
Client Information	We collect the name, and contact information, of our clients and their employees with whom we may interact.	We use this information to contact our clients and communicate with them concerning normal business administration such as loans, services, and billing.

Cookies and first party tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a website is viewed. See the Cookies Section for more information.	We use this information to ensure our website operates efficiently.
Demographic Information	We may collect personal information, such as your age, location, and gender.	We use this information to comply with applicable laws.
Distance Information	When you use our App we collect your location from the GPS, Wi-Fi, IP address and/or cellular technology in your device to determine your location and your distance from a store that sells our products.	We use this information to understand our users and provide tailored services.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We use this information to understand how you interact with our communications to you.
Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about current employees to carry out our payment and benefits obligations. In some contexts, we are also required by law to collect information about our employees. We also use this information to have efficient staffing and work force operations.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We use this information in order to receive, and act upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We also use this information to share information about our products or services.

Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website or when visiting one of our stores.	We use this information to identify unique visitors and understand how users interact with us on their mobile devices.
Partner Promotion	We collect information that you provide as part of a co-branded promotion with another company.	We use this information to fulfil our promotions.
Surveys	When you participate in a survey we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We use this information to understand your opinions and collect information relevant to our organization.
Sweepstakes or contests	When you participate in a sweepstakes or contest we collect information about you which includes contact information to notify you if you are selected.	We use this information to operate the sweepstakes. In some contexts we are also required by law to collect information about those that enter into our sweepstakes.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We use this information to understand how you interact with our website to better improve it, and to understand your preferences and interests in order to select offerings that you might find most useful. We also use this information to detect and prevent fraud.
Web logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We use this information to monitor our networks and the visitors to our websites. Among other things, it helps us understand which of our products or services is the most popular.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

Use And Processing Of Information

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites or our branches.

- To provide loans or other services.
- To improve our services and loan offerings.
- To streamline the online banking process.
- To conduct analytics.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you open an account with us or take out a loan, we may collect your information to perform our contract with you, but we also collect your information so that we can quickly and easily respond to any questions about your account or loan.

Sharing Of Information

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our affiliates (*e.g.*, parent bank, sister banks, subsidiary banks or other banks or institutions under common control). If another bank or institution acquires, or plans to acquire, our bank, business, or our assets, we will also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
3. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of services by a third party intermediary.
4. **Public.** Some of our websites or social media pages may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
5. **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.
6. **Service Providers.** We may share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.

Your Choices

You can make the following choices regarding your personal information:

1. **Access To Your Personal Information.** You may request access to your personal information by contacting us at the address described below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.
2. **Deletion Of Your Personal Information.** You may request that we delete your personal information by contacting us at the address described below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.
3. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
4. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line along with your name, address and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
5. **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying "STOP."

Please submit requests and questions about your rights using the contact information below.

Note that, as required by law, we will require you to prove your identity. We may verify your identity through the password-protected online account you hold with us. If we are unable to verify your identity through your online account, we may verify your identity by phone call or email. Depending on your request, we will ask for information such as your name, your date of birth, your account number, the amount and date of the last transaction associated with your account, your driver's license number or a photo of your driver's license or other form of identification, or your social security number. We may also ask you to provide a signed declaration confirming your identity.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us.

If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

1. A completed Authorized Agent Designation Form, signed by the individual and notarized, indicating that you have authorization to act on the consumer's behalf.
2. If you are a business, proof that you are registered with the Secretary of State to conduct business in California.

If we do not receive both pieces of information, the request will be denied.

How We Protect Personal Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

Cookies

A cookie is a small file placed onto your device that enables a variety of features and functionality. Cookies can do this because websites can read and write them, enabling websites to recognize you and remember important information that will make your use of a website more convenient (for example by remembering preference settings).

We use a variety of cookie types:

- **Preference Cookies.** Preference cookies collect information about your choices and preferences and allow us to remember language or other local settings and customize the websites accordingly.
- **Strictly Necessary Cookies.** Strictly necessary cookies are necessary for the website to work and to enable you to move around it and to use its features. Without these cookies, websites will not perform as intended and we may not be able to provide our website or certain services or features you request.
- **Analytics Cookies.** Analytics cookies collect information about your use of the website and enable us to improve the way it works. For example, analytics cookies show us which are the most frequently visited pages on a website, help us record any difficulties you have with a website, and show us whether our advertising is effective or not. This allows us to see the overall patterns of usage, rather than the usage of a single person.
- **Advertising Cookies.** Advertising cookies are used for marketing purposes.

Most browsers allow you to control and erase cookies through their settings preferences. Note that if you limit the ability of websites to set cookies, you may worsen your overall user experience, since it will no longer be personalized to you. Additionally, some features may work improperly or not at all. We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

Other Important Information

The following additional information relates to our privacy practices:

- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an "effective" and

"last updated" date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

- **Accessibility.** If you are visually impaired, you may access this notice through your browser's audio reader.
- **Information for California Residents.** California law indicates that organizations should disclose whether certain categories of information are collected, "sold" or transferred for an organization's "business purpose" (as those terms are defined under California law). You can find a list of the categories of information that we collect and share [here](#). Please note that because this list is comprehensive it may refer to types of information that we share about people other than you. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below. We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy.

Contact Information

If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Client Care
clientcare@crossfirstbank.com
11440 Tomahawk Creek Parkway
Leawood, KS 66211
(844) 261-2548

Effective Date: January 1, 2021



California Information Sharing Disclosure

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). We do not “sell” your personal information. The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Categories of Personal Information That We Collect	Categories of Third Parties to Whom We Disclose Personal Information for Business Purpose
<p>Identifiers – such as name, postal address, phone number, unique personal identifier, online identifier, internet protocol (IP) address, device ID, email address, account name, signature, social security number, driver’s license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Service Providers • Information Security and Technology Support Service Providers • Credit Reporting Service Providers • Anti-Money Laundering Compliance Service Providers • Internet Service Providers • Marketing and Advertising Support Vendors • Social Media • Payment Processors and financial institutions • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Human Resources Service Providers • Data analytics providers
<p>Financial information – such as bank account number, credit or debit card number, or other financial information.</p>	<ul style="list-style-type: none"> • Service Providers • Information Security Service and Technology Support Providers • Credit Reporting Service Providers • Anti-Money Laundering Compliance Service Providers • Payment Processors and financial institutions • Human Resources Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law

<p>Protected characteristics – such as race, gender, physical or mental disability, and religion.</p>	<ul style="list-style-type: none"> • Service Providers • Human Resources Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law
<p>Commercial information – such as information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Service Providers • Information Security and Technology Support Service Providers • Social Media • Marketing and Advertising Support Vendors • Payment Processors and financial institutions • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers
<p>Network activity data– internet or other electronic network activity information, such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Service Providers • Information Security and Technology Support Service Providers • Internet Service Providers • Advertising Networks • Social Networks • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers
<p>Biometric information – such as fingerprint, face print or voice print.</p>	<ul style="list-style-type: none"> • Service Providers • Information Security and Technology Support Service Providers • Human Resources Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law
<p>Geolocation data – such as precise physical location.</p>	<ul style="list-style-type: none"> • Service Providers • Internet Service Providers • Information Security and Technology Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers
<p>Electronic and sensory data – such as audio, electronic, visual, or similar information (e.g., pictures, a recording of a customer service call, security video surveillance footage).</p>	<ul style="list-style-type: none"> • Service Providers • Information Security and Technology Support Service Providers • Human Resources Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law

<p>Professional/employment information – such as occupation and professional references.</p>	<ul style="list-style-type: none"> • Service Providers • Human Resources Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law
<p>Education information – such as information contained in education records.</p>	<ul style="list-style-type: none"> • Service Providers • Human Resources Service Providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law
<p>Inferences – drawn from any of the information listed above to create a profile</p>	<ul style="list-style-type: none"> • Service Providers • Advertising Networks • Marketing and Advertising Support Vendors • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers