Renasant California Consumer Privacy Act Privacy Notice

This California Privacy Notice is for California Residents ("Notice") and is provided by Renasant Bank, Renasant Corporation, Renasant Insurance, Inc., Renasant Leasing Corp. II, Park Place Capital Corporation, Renasant Capital Funding Corporation, Renasant Capital Corp. II, Continental Republic Capital, LLC d/b/a Republic Business Credit and any entity owned or controlled by Renasant Corporation or Renasant Bank (collectively referred to in this Notice as "Renasant," "Company," "we," "our," or "us). This Notice supplements the information contained in Renasant's General Privacy Policy and applies solely to all visitors, users, and others who are residents of the State of California ("consumers" or "you"). This notice describes:

- The Personal Information that Renasant collects in the course of its business and explains how this information is collected, used, sold, disclosed, shared, and retained;
- The rights provided to you by the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), as a California Resident regarding your Personal Information; and
- How you can exercise those rights.

Any terms defined in the CCPA or the CPRA have the same meaning when used in this Notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer ("**Personal Information**") or household. Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.

With a limited exception, certain provisions of the CCPA do not apply to Personal Information covered by or collected under industry-specific privacy laws including but not limited to 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.

The CCPA requires us to disclose certain information regarding our collection, use, sale, sharing, disclosing, and retention of your Personal Information in the course of providing our financial services to you. In particular, we collected the following categories of Personal Information from our consumers within the last twelve (12) months:

Category	Business Purpose	Collected, Sold, or Shared? An "x" indicates a "yes" response.
Identifiers.	Collected as part of an inquiry or application for our products or services, utilized for identity confirmation,	Collected ⊠ Sold □

Category	Business Purpose	Collected, Sold, or Shared? An "x" indicates a "yes" response.
Examples: 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.	product/service processing, authenticating information, and compliance with government regulatory requirements.	Shared
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). Examples: A name, signature, Social Security number, physical characteristics or description, 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.	Collected as part of an inquiry or application for our products or services, utilized for identity confirmation, product/service processing, authenticating information, or compliance with government regulatory requirements.	Collected ⊠ Sold □ Shared □
Protected classification characteristics. Examples: Age, race, color, ancestry, national origin, citizenship, marital status, sex, veteran or military status.	For compliance with government regulatory requirements on monitoring or demographic information collection and collected as part of an inquiry or application for our products or services.	Collected ⊠ Sold □ Shared □
Commercial information. Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	For use in a financial transaction, evaluation of creditworthiness, review or granting of collateral, or determining terms or conditions of product or service.	Collected ⊠ Sold □ Shared □
Internet or other similar network activity. Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Internet or network activity information, such as browsing history and interactions with our website and Internet Protocol location. To monitor or improve online and website interactions, for security purposes.	Collected ⊠ Sold □ Shared □
Professional or employment- related information.	Collected as part of an inquiry or application for our products or services, product/service processing,	Collected ⊠ Sold □

Category	Business Purpose	Collected, Sold, or Shared? An "x" indicates a "yes" response.
Examples: Job title, company name, address, current or past job history, employment status.	authenticating information, reviewing creditworthiness information, or verifying financial capacity.	Shared
Education information. Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as student financial information.	Collected as part of an inquiry or application for our products or services, product/service processing, authenticating information, reviewing creditworthiness information, or verifying financial capacity.	Collected ⊠ Sold □ Shared □
Sensitive Personal Information. Examples: Social security number, driver's license number, passport number, account number, racial or ethnic origin.	Collected to provide requested services or product, facilitate account access and maintenance, utilized for identity confirmation, product/service processing, authenticating information, and compliance with government regulatory requirements.	Collected ⊠ Sold □ Shared □

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.

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete, documents or information you provide us as part of a transaction or inquiry, or products and services you obtain from us.
- Indirectly from you. For example, from observing your actions on our Website.
- From third parties you authorize or service providers. For example, from credit bureaus, employers (such as a verification of employment), appraisers, property inspectors, or certain government agencies, services, or databases.
- From financial services or data providers. For example, fraud or credit monitoring reports, property information services or databases (tax information, property values, property liens, ownership information), or insurance policies and information.

With the exception of internet and other network activity, we retain the Personal Information identified above for the duration of a product, service, or our ongoing relationship and as required by regulatory requirements or our record retention policy. Also, the internet and other network activity information we collect does not identify consumers and is retained in accordance with website analytics settings.

Use and Disclosure of Personal Information

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

• To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a quoted interest rate or product terms, or ask a question about

our products or services, we will use that information to respond to your inquiry. If you provide your information to obtain a product or service, we will use that information to open, process, fulfill, originate, or evaluate the requested product or service. We may also save your information to facilitate the servicing, maintenance, or normal administration of the product or service, such as maintaining a deposit account or servicing a loan or line of credit.

- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, deposits, withdrawals, draws, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- To comply with regulatory requirements for collecting certain information or retaining it, such as but not limited to, the Home Mortgage Disclosure Act and Bank Secrecy Act.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- 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 information held by us about our consumers is among the assets transferred.

We only collect or use Sensitive Personal Information for the following business or commercial purposes:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted Personal Information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us.
- To perform services on our behalf.

- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.
- To collect or process sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

We may disclose your Personal or Sensitive Personal Information to a third party for one of the business purposes listed above. When we disclose Personal Information for a business purpose, we enter into 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 for performing the contract.

In the preceding twelve (12) months, Company has disclosed the following categories (as described above) of Personal Information for a business purpose:

- Identifiers. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
 - o Joint marketing companies (as disclosed in our general Renasant privacy policy)
- California Customer Records Personal Information categories. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
 - o Joint marketing companies (as disclosed in our general Renasant privacy policy)
- Protected classification characteristics under California or federal law. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
 - o Joint marketing companies (as disclosed in our general Renasant privacy policy)
- Commercial information. We may share this information with the following categories of third parties:
 - o Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
 - o Joint marketing companies (as disclosed in our general Renasant privacy policy)
- Internet or other similar network activity. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
- Joint marketing companies (as disclosed in our general Renasant privacy policy)Professional or employment-related information. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
 - o Joint marketing companies (as disclosed in our general Renasant privacy policy)

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- Non-public education information. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)
 - o Joint marketing companies (as disclosed in our general Renasant privacy policy)
- Sensitive Personal Information. We may share this information with the following categories of third parties:
 - Service providers and contractors
 - o Parent or subsidiary organizations,
 - o Affiliates (if applicable or as specified in our Renasant privacy policy)

Sharing and Sale of Personal Information

We do not share Personal or Sensitive Personal Information with third parties for cross-context behavioral advertising ("Sharing").

We do not sell Personal or Sensitive Personal Information. In the preceding twelve (12) months, we have not sold or Shared with third parties for cross-context behavioral advertising Personal Information or Sensitive Personal Information. We also do not sell or Share the Personal Information of consumer's we actually know are less than 16 years of age.

Your Rights and Choices

The CCPA provides consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

- 1. The <u>Right to Know/Access</u> what Personal Information we have collected about you. Before or when we collect your Personal Information, you have the right to know:
 - The categories of Personal Information (including Sensitive Personal Information) we collect, the business or commercial purpose for which we collect and use the Personal Information, and whether we sell or share that information; and
 - How long we intend to keep each category of Personal Information, including Sensitive Personal Information.

You also have the right to request that we provide you with certain information about the Personal Information we collect, use, share, disclose, or sell, as well as the categories and specific pieces of information that we have collected about you. Specifically, you have the right to request the following information:

- The categories of Personal Information we collect.
- o The categories of sources from which the Personal Information is collected.
- o The business or commercial purpose for collecting, selling, or sharing Personal Information.
- o The categories of third parties to whom we disclose Personal Information.

- o If we sold or shared your Personal Information, which we do not, the categories of Personal Information that we collected and shared about you and, for each category identified the categories of third parties to which we, shared that particular category of Personal Information.
- If we disclosed your Personal Information for a business purpose, the categories of Personal Information that we disclosed about you and the categories of third parties to which we disclosed that Personal Information for a business purpose.
- o The specific pieces of Personal Information the business has collected about you.
- 2. The <u>Right to Delete</u> the Personal Information we collected and maintained about you once we verify your request. However, there may be reasons we need to keep your Personal Information and we will inform you if that is the case.
- 3. The <u>Right to Correct</u> inaccurate Personal Information we have collected from you and maintained about you. Once we verify your request, including the inaccurate information, we will update your inaccurate Personal Information from our records and our service provider's records.
- 4. The <u>Right to Limit the Use and Disclosure of Sensitive Personal Information</u> if we use the information for reasons that are not aligned with why we obtained such information. However, we can use this information to perform services you would reasonably expect (including providing this information to service providers), help ensure security and integrity of your Sensitive Personal Information, as permitted by law, to follow the law, and to give you the best service.
- 5. The right to **Non-Discrimination or Non-Retaliation**, which means we cannot discriminate or retaliate against you if you exercise your rights under the CCPA.

You also have the **Right to Opt-Out** of the Sale or Sharing (for targeted advertising) your Personal Information. However, we do not sell or Share your Personal Information.

Exercising Your Request Rights Submitting a Verifiable Request to Know, Correct, or Delete Personal Information

To exercise the rights above, please submit a verifiable consumer request to us by either:

• Website: CCPA Requests form

• **Phone**: 877-367-5371

• **Email**: <u>info@renasant.com</u>

• Online Banking: Logging into your online banking account with us and using the messaging service located within the online banking account.

• Mail:

Renasant Bank Attention: CCPA Privacy Request P. O. Box 4140 Tupelo, MS 38803

When you submit a verifiable consumer request, we must verify your identity as follows:

- o If you currently maintain a password-protected account with us (i.e., online banking), you may make a request through that account for specific pieces of information or categories of information to which that account relates and may make correction or Sensitive Personal Information limitation request as well. You may also make deletion requests in this manner, although please be aware information may be needed in order to administer the account and so its deletion may be exempt under the CCPA (to the extent you desire to maintain the account). You will be required to login into the account to view or access the response, and this will serve as re-authentication of your identity. For the avoidance of doubt, you are not required to create an account with us if you currently do not have one. Please review the methods below if you do not currently have an account with us.
- o If you request specific pieces of information, deletion of information, or correction of information, you must provide us with the last four digits of your social security number, monetary amount in or of your account, and branch of account opening, so that we may confirm or match what you provide us with our information. You must also provide us with a declaration stating, "I, the undersigned, am making a request for disclosure of specific pieces of Personal Information or deletion of information under the CCPA. By signing below I certify and declare I am the consumer to whom the information relates, am the requestor whose Personal Information is the subject of the request, and I make this certification and declaration under penalty of perjury."
- o If you request the categories of information or sensitive Personal Information limitation, you must provide us with the last four digits of your social security number and the branch of account opening, so that we may confirm or match them with our information.²
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will generally avoid requesting additional information from you to verify you unless necessary. This information will only be used to verify your identity and will delete any new Personal Information we collect to verify your identity as soon as possible.

If we are unable to verify your identity, we will let you know and explain why we were unable to verify your identity.

If you would like to use an authorized agent, which is an individual or business entity authorized to act on your behalf, to submit a verifiable request, you must provide the authorized agent with written permission to do so <u>and</u> verify your own identity directly with us <u>or</u> directly confirm that you provided the authorized agent with permission to submit the request. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

Please note that we will not respond to a request for your Personal Information if you have submitted more than two requests in a 12-month period.

Responding to a Request to Know, Correct, or Delete Personal Information

Once we receive your request, we will send you a confirmation email within 10 days and provide you with next steps for processing your request, including verifying your identity. We will respond to your request within 45 days unless we need more time. We will provide you with additional information if that is the case.

We will not charge you to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request will include some costs, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Other California Privacy Rights

California's Shine the Light Act permits users of our Website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to info@renasant.com or write us at: Attention: CCPA Request, P. O. Box 4140, Tupelo, MS 38803.

We do not engage in the collection of personally identifiable information about a consumer's online activities over time and across third-party websites or online services. Our website(s) do not respond to "do not track" signals.

We may utilize Google Analytics to collect and process certain non-personally identifiable information to measure and report on statistics about user interactions on our website(s). For further information, please see https://policies.google.com/technologies/partner-sites.

Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. We are required by law to update this California Privacy Notice at least once every 12 months. When we make changes to this privacy Notice, we will post the updated Notice on the Website and update the Notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this Notice, the ways in which Renasant collects and uses your information described here and in our general **Privacy Notice**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by:

Renasant Bank

Attention: CCPA Privacy Request

P. O. Box 4140 Tupelo, MS 38803 **Phone**: 877-367-5371 **Email**: info@renasant.com

Online: Logging into your online banking account with us and using the messaging service located within

the online banking account.

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