

# California Consumer Privacy Policy

Effective Date: January 1, 2020

This California Consumer Privacy Policy (“Policy”) applies to California residents subject to the California Consumer Privacy Act (“CCPA”). For an accessible version of this policy, please click [here](#).

## 1. PERSONAL INFORMATION COVERED BY THE CCPA

Financial institutions, such as BMO Harris Bank N.A. and its U.S. affiliates (“BMO,” “we,” “us,” “our”), are subject to certain laws and regulations that govern how we may collect, use, and disclose personal information, including the federal Gramm-Leach-Bliley Act (“GLBA”). The CCPA does not apply to personal information collected, processed, sold, or disclosed pursuant to the GLBA. The personal information of California residents we collect, process, or disclose pursuant to this Policy does not include (i) publicly available information, (ii) de-identified or aggregate consumer information, (iii) information excluded from the CCPA’s scope, such as GLBA personal information, and (iv) personal information collected for a single, one-time transaction in the ordinary course of business, and not retained.

## 2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on the product or service you have with us, and your use of BMO websites and services. Over the past 12 months and on an ongoing basis, the information we may collect includes:

Category of Information	Examples
Personal Identifiers	First, Middle and Last Name, DBA or other alias, postal address, email address, phone numbers, Social Security number or other tax identification number, passport number, driver’s license number, military identification number, bank account number, credit card number, debit card number, signature, internet protocol address
Commercial Information	Deposit and credit account numbers, assets and liabilities, sources of income, products or services purchased, obtained, or considered, records of transactions, other purchasing or consuming histories or tendencies, records of real property and personal property; other financial information such as assets and liabilities, other sources of income, insurance policy numbers
Professional or Employment Related Information	Occupation, employment history, titles or positions with government entities, employers, or companies you own, salary or self-employment income
Characteristics of Protected Classifications	Age/date of birth, gender, race, color/ethnicity, national origin, military or veteran status
Internet/Electronic Network Activity	Information regarding interaction with BMO Financial Group’s internet websites, applications and advertisements (see also: <a href="#">Digital Privacy Policy</a> )

Biometric information	Voice ID or voiceprint
Audio, Visual and Similar Information	Copies of passport, driver’s license or other photo IDs; images on building and ATM security cameras; voice message recordings

**Sources of Collected Personal Information:** We obtain the categories of personal information listed above from different sources:

- **Directly from you.** For example, when you use our products or services (through in-person interactions at a branch electronically, or over the phone).
- **From third parties.** From time to time, we receive personal information from third parties, like our business partners, vendors, and other entities, who are authorized to share certain personal information with BMO.
- **Our websites and mobile apps.** We collect certain personal information when customers visit our banking website(s) or use our banking mobile application(s). Please refer to our [Digital Privacy Policy](#) for further information.

**3. HOW WE USE YOUR PERSONAL INFORMATION**

When we collect personal information, we may use any of the categories of personal information we have collected for a range of commercial purposes, which will vary depending on the nature of your relationship with BMO. For example, we may use the same categories of personal information differently depending on whether you are a BMO customer or a job applicant. In all cases, if a new purpose for using your personal information develops that is unrelated or materially different from these purposes, we will identify that purpose.

If you are **BMO customer**, we may use your personal information to:

- verify your identity;
- provide and manage products and services you have requested;
- understand your financial services requirements;
- report to consumer credit bureaus and business reporting companies;
- protect against fraud and manage risk;
- determine suitability of products and services for you;
- better manage your relationship with us;
- determine your eligibility for certain of our products and services, or products or services of others;
- comply with legal or regulatory requirements, or as otherwise permitted by law;
- communicate with you regarding products and services that may be of interest;
- understand our customers and develop and tailor our products and services; and/or
- respond to any questions you may have.

If you are a **job applicant**, we may use your personal information to:

- determine your eligibility for the role you are applying for;
- identify, and communicate to you, other potential opportunities at BMO that may be a good match for your qualifications;
- comply with legal or regulatory requirements, or as otherwise permitted by law; and/or
- respond to any questions you may have.

- If you are **visiting a BMO website please refer to our [Digital Privacy Policy](#) to learn more about the uses of your information.**

#### 4. HOW WE DISCLOSE YOUR INFORMATION

We will only use or disclose your personal information for the purpose(s) it was collected and as otherwise identified in this Policy. We do not sell your personal information to any other business or third parties for monetary or other valuable consideration. We do not disclose the names or other personal information of our customers to other companies outside of the BMO without consent unless required or permitted by law. We may share your personal information within BMO for legal and regulatory purposes, to manage credit risk and other business risks, to perform analytics, to ensure we have correct and up to date information about you (such as your current address or date of birth), and to better manage your relationship with us. In addition, in the past 12 months, personal information may be disclosed to the following:

- service providers who assist us in managing and servicing your account(s);
- legal or regulatory authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations;
- third parties in order to comply with a court order or other legal process; or
- third parties in order to protect our assets (for example, collection of overdue accounts).

#### 5. YOUR RIGHTS WITH RESPECT TO PERSONAL INFORMATION

If you are a California resident, you have certain rights with respect to your personal information, as described below. We reserve the right to verify your identity in connection with any request related to exercising these rights to help ensure that we provide the information we maintain to the individuals to whom it pertains, and allow only those individuals or their authorized representatives to exercise these rights. Please note that your exercise of these rights is subject to certain exemptions that include, but are not limited to, safeguarding the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege).

As a California resident, you have the following rights:

- **Right to Access Data:** You may submit a request for access to the categories of personal information we collect, the sources from which we collect that personal information, the business or commercial purpose for collecting personal information, categories of third parties with which we share personal information and the specific pieces of personal information we have collected about you.
- **Right to Delete Data:** You may submit a request that we delete or remove certain personal information that we may have collected about you, as long as we are not otherwise obligated or permitted to retain or use that information for a lawful purpose. If we reject your request, we will notify you of the reason(s) for the rejection.

- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment for the exercise of your privacy rights under the CCPA.

**Note:** BMO does not sell your personal information, so there is no need to opt-out of the sale of your personal information.

Section 6, below, sets out the process for you to submit a request with respect to your right to access or delete personal information, and explains the process we will use to verify your request.

## 6. SUBMITTING REQUESTS UNDER THE CCPA

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

- visiting [this website](#) and completing the form; or
- calling us at 1-888-340-2265

**Time for Completion:** All requests typically will be fulfilled within forty-five (45) days of submission. We verify consumer request(s) by comparing information you provide with information we maintain or possess on file. As part of this process, you may be asked to provide certain identifying information, which we will use for the purpose of verifying your identity, only. Please note that for certain requests, we reserve the right to ask you to provide us with a signed declaration under penalty of perjury affirming that you are the consumer whose personal information is the subject of the request.

**Designating an Agent:** If you wish to designate an authorized agent to submit a CCPA request on your behalf, you must provide us with a written and signed declaration (i) explaining that you intend to designate an authorized agent to assert your rights under CCPA, (ii) identifying by name and address the intended authorized agent, (iii) stating the specific right(s) you intend to have the agent assert on your behalf, and (iv) stating that you consent to the designated agent receiving personal information about you, the requestor. Alternatively, you may also provide us with legal documents demonstrating that you have designated another individual with power of attorney. Individuals wishing to designate an authorized agent must provide their written and signed declaration or other supporting documents to [privacy.matters@bmo.com](mailto:privacy.matters@bmo.com) prior to the submission of a CCPA request by the designated agent.

## 7. CHILDREN AND MINORS' PRIVACY

Our site is not directed at individuals under the age of sixteen (16), and we do not knowingly solicit, collect or use personal information from children under 16. Minors under 16 are prohibited by this Policy from providing personal information through our Site.

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BMO is committed to protecting your personal information and privacy. We regularly review and, if appropriate, update this Policy from time to time, and as our services and use of personal information evolves. If we make material changes to this Policy, we will notify you here, by email, or by means of a

notice on our homepage at <https://bmoharris.com/privacy>. You can tell if this Policy has changed by checking the effective date that appears at the top of this Policy. We will update the date of this Policy each calendar year or each time it is changed.

## CONTACT US

If you have any questions or concerns about our privacy practices, the privacy of your personal Information or you want to change your privacy preferences, please let us know by contacting us at [privacy.matters@bmo.com](mailto:privacy.matters@bmo.com). You can also raise questions or concerns about our privacy practices by visiting one of our branches.

