California Consumer Privacy Act Disclosure

This Privacy Policy for California Consumers supplements the information contained in the Privacy Policy of 1st Source Bank and its subsidiaries (collectively, "we," "us," or "our") and applies solely to consumers who reside in the State of California ("consumers" or "you"). Any terms defined in the California Consumer Privacy Act of 2018, as amended, and its implementing regulations ("CCPA") have the same meaning when used in this notice. This Privacy Policy for California Consumers can be found online at www.1stsource.com/privacy

INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

CATEGORY	EXAMPLES*
A. Identifiers	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
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	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. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or information relating to past transactions.
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 other physical patterns, and sleep, health, or exercise data.
F. Internet or other similar network activity	Information on a consumer's interaction with a website, application, or advertisement.
G. Geolocation data	Physical location or movements
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information
I. Professional or employment-related information.	Current or past job history or performance evaluations
J. Non-public education information	Student education records such as transcripts maintained by an educational institution or party acting on its behalf.
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, goals, and financial needs.

* We may not collect all items listed as examples in a particular category.

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 our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.

- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website and mobile application. For example, from submissions through our website portal or website usage details we collect automatically.
- From third parties that interact with us in connection with the services we perform – for example, from credit bureaus when we offer or extend credit to you.

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 your personal information to purchase a product or service, we will use that information to process your request.
- To provide you with information, products, or services that you request from us.
- To create, maintain, customize, and secure your account with us
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- 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.

We will keep Personal Data, including Sensitive Personal Information, no longer than reasonably necessary to fulfil the purposes described in this Notice. Under records and information management policy, we are required to destroy records containing Personal Data, including Sensitive Personal Information, according to specific periods in our retention schedule. However, we may need to hold such records beyond these retention periods as set forth in our record retention policy, due to regulatory requirements or in response to a regulatory audit, investigation, or other legal matter.

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 months, we have disclosed the following categories of personal information to third parties for a business purpose:

Category A: Identifiers
Category B: California customer records personal information categories
Category C: Protected classification characteristics under California or federal law
Category D: Commercial information

We disclose your personal information for a business purpose to the following:

- Our affiliates
- Vendors and 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
- Government or regulatory authorities

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

SENSITIVE PERSONAL INFORMATION (SPI)

We may collect certain categories of Sensitive Personal Information as permitted by applicable law and as necessary to provide our products and services. Categories of Sensitive Personal Information that may be collected include government-issued identification numbers, account log-in credentials, financial account information, debit card or credit card information, precise geolocation information, and other information that may be considered Sensitive Personal Information under California law.

We collect and use Sensitive Personal Information for legitimate business purposes, including providing requested products and services, processing transactions, managing accounts, verifying identity, preventing fraud, maintaining security, complying with legal and regulatory requirements, and otherwise operating our business.

Additional information regarding our collection, use, disclosure, retention, and protection of personal information and Sensitive Personal Information is available in our Privacy Notice, which can be found at 1stsource.com/help/1st-source-bank-online-privacy-notice/.

We do not use or disclose Sensitive Personal Information for purposes other than those permitted by applicable law. Accordingly, we do not offer a right to limit the use or disclosure of Sensitive Personal Information beyond the rights already provided under California law.

YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve months and to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we have shared or share that personal information.
- The categories of personal information we disclosed or shared with a third party for a business purpose.
- The specific pieces of personal information we collected about you (also called a data portability request)

We cannot provide you specific pieces of personal information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of that personal information, the consumer's account with the business, or the security of the business's systems or networks.

You have the right to request that we correct inaccurate personal information that we maintain about you. Upon receipt of a verifiable consumer request, we will use commercially reasonable efforts to correct inaccurate personal information contained in our records, taking into account the nature of the personal information and the purposes for which we process the personal information. We may request information from you to verify your identity and substantiate your request. In certain circumstances, we may deny a request to correct personal information as permitted by applicable law. If we deny your request, we will explain the basis for our decision.

DELETION REQUEST RIGHTS

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if an exception applies, such as regulatory obligations or required for servicing the account.

EXERCISING ACCESS, CORRECTION, DATA PORTABILITY, AND DELETION RIGHTS

To exercise the access, correction, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (800) 513-2360
- By mailing a completed CCPA Request form to:
  1st Source Bank
  Attention: CCPA Requests
  P.O. Box 1602
  South Bend, IN 46601
- By completing our CCPA Request form and emailing it to CCPA@1stsource.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. 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.

RESPONSE TIMING AND FORMAT

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or e-mail at your direction.

Any disclosures we provide will only cover the 12-month period preceding the date of receipt of consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify through a notice on our website homepage.

CONTACT INFORMATION

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (800) 513-2360

Mail: 1st Source Bank
Attn: CCPA Requests
P.O. Box 1602
South Bend, IN 46601

Email: CCPA@1stsource.com

This form is reviewed on an annual basis