



California Consumer Notice at Collection

FOR CALIFORNIA RESIDENT EMPLOYEES AND EMPLOYMENT APPLICANTS ONLY

Last Updated: May 2024

Bank OZK ('Bank') respects and values your privacy. This California Consumer Notice at Collection ('Notice') provides you with important information about the personal information we collect, how we may use or disclose this information, your privacy rights, and the Bank's obligations in accordance with the California Consumer Privacy Act of 2018 ('CCPA') and the California Privacy Rights Act of 2020 ('CPRA'). This Notice supplements the information contained in the Bank OZK Privacy Notice and the Bank OZK Online Privacy Statement. For additional information regarding our data privacy practices, please see our Privacy Policy (<https://www.ozk.com/privacy/>).

For purposes of this Notice, the terms 'we', 'us', and 'our' refer to the Bank and its affiliates.

DEFINITIONS

Consumer: For purposes of this Privacy Notice, a consumer is a natural person who is a California resident and applied for employment, is currently employed, or was previously employed by the Bank.

Biometric Information: An individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

Personal Information ('PI'): Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

PI does not include:

- Publicly available information from government records;
- Information that the Bank has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media;
- Information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience; or
- De-identified or aggregated consumer information.

Sensitive Personal Information ('SPI'): SPI is defined as:

- PI that reveals:
 - A consumer's social security, driver's license, state identification card, or passport number.
 - A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
 - A consumer's precise geolocation.
 - A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership.
 - The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.
 - A consumer's genetic data.

- The processing of biometric information for the purpose of uniquely identifying a consumer.
- PI collected and analyzed concerning a consumer’s health.
- PI collected and analyzed concerning a consumer’s sex life or sexual orientation.

SPI does not include:

- Publicly available information from government records;
- Information that the Bank has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media;
- Information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience; or
- De-identified or aggregated consumer information.

PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION WE COLLECT

We collect personal information as necessary to enable us to carry out your instructions, to manage and operate our business, and to comply with our legal and regulatory obligations.

The PI that we collect about you may include the following:

CATEGORY	EXAMPLES	COLLECTED
A. Identifiers.	A real name, alias, signature, home and/or mailing address, email address, telephone number(s), unique personal identifiers (e.g., your employee ID), online identifiers, Internet Protocol addresses, account names and numbers, transaction information, usernames and passwords, social security number, driver’s license number, passport number, etc.	YES
B. Any personal information described in subdivision (e) of Section 1798.80.	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.	YES
C. Characteristics of protected classifications 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.	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
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.	YES

F. Internet or other similar network activity.	Browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Resume, certification, education, authorization to work, prior experience, professional license, or employment file in cases of merger or acquisition.	YES
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)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

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 (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Bank OZK obtains the categories of personal information listed above from the following categories of sources:

- **You.** We may collect Personal Information directly from you or your device, such as through your use of our website, facilities, or systems, when you send us an email, contact us by phone, or otherwise communicate or interact with us. We collect information when you are an applicant for employment with us or employed by us.
- **Related Entities and Affiliates.** We may collect information about you from our related parties and affiliates.
- **Social media and related services.** We may collect information about you through your social media services consistent with your settings on such services.
- **Third parties.** We may collect information about you from third parties such as your references, background check vendors, staffing agencies, clients, or other third-party sources that are lawfully entitled to share your data with us. This may include service providers or contractors who collect or process your PI on our behalf.

THE PURPOSES FOR WHICH PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION IS COLLECTED AND/OR DISCLOSED

The purposes for which the Bank will collect, disclose, or use your PI and SPI are listed below:

- Collecting and processing employment applications, including confirming eligibility for employment, background and related checks, drug tests, references, onboarding, and related recruiting efforts.
- Maintaining physician records and occupational health programs.
- Maintaining records and satisfying record retention requirements.
- Communicating with applicants about a current application, future job opportunities, or current and past employment.
- Submitting relevant information to prospective employers.
- Submitting relevant information for payment of wages and bonuses.
- Complying with applicable state and federal health, labor, employment, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.
- Preventing unauthorized access to, use, or disclosure/removal of the Bank's property, including the Bank's information systems, electronic devices, network, and data.
- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling and leave of absence administration.
- Communicating with employees and/or employees' emergency contacts and plan beneficiaries.
- Ensuring and enhancing employee productivity and adherence to the Bank's policies.
- Improving accuracy of time management systems and attendance, including vacations, sick leave, and other absence monitoring.
- Providing training and development opportunities.
- Investigating complaints, grievances, and suspected violations of Bank policy.
- Designing, implementing, and promoting the Bank's diversity and inclusion programs.
- Facilitating the efficient and secure use of the Bank's information systems.
- Ensuring compliance with the Bank information systems policies and procedures.
- Improving safety of applicants, employees, customers, and the public with regard to use of Bank property and equipment.
- Improving efficiency.
- Evaluating an individual's appropriateness for a particular position at the Bank or promotion to a new position.
- Protecting the legal rights, privacy, safety or property of Bank or its employees, agents, contractors, customers, or the public.
- Protecting against fraud or other illegal activity or for risk management purposes.
- Responding to and managing legal claims against the Bank and/or its personnel, including civil discovery in litigation.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, merger and acquisition activities, and maintenance of licenses, permits and authorization applicable to Bank operations.

DISCLOSURE OF PERSONAL INFORMATION

The Bank may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we may 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 (12) months, we may have disclosed the following categories of personal information for a business purpose: Categories A, B, C, H, I, and J.

We disclose your personal information for a business purpose to the following categories of third parties:

- Third parties as directed by you.
- Affiliates.
- Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.
- Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.
- Governmental entities, professional services providers.

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

DATA RETENTION

The Bank retains your Personal Information for as long as is necessary to fulfill the purpose for which it was collected (e.g., to process your application for employment, manage the employment relationship) and in accordance with the Bank's data retention schedule. We may retain your Personal Information for longer if it is necessary to comply with our legal or reporting obligations (e.g., if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. To determine the appropriate retention period for your Personal Information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your Personal Information; and applicable legal requirements.

Personal information does not include certain categories of information, such as publicly available information from government records, and deidentified or aggregated information. We may also retain your Personal Information in a deidentified or aggregated form so that it can no longer be associated with you.

CONSUMER RIGHTS

Individuals who are residents of the State of California have the following rights:

1. Right to Know What PI is Collected/Right to Access PI

You have the right to request that we disclose the following:

- The categories of PI we collect;
- The categories of sources from which the PI is collected;
- The business purpose(s) for collecting, selling or sharing PI;
- The categories of third parties to whom we disclose PI; and
- The specific pieces of PI we have collected.

2. The Right to Limit Use and Disclosure of SPI

You have the right, at any time, to direct us to limit the use of your SPI to that use which is necessary:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services;
- To perform certain services (including, but not limited to, helping to ensure security and integrity, maintaining, or servicing accounts, providing customer service, and processing or fulfilling orders and transactions); and
- As authorized by certain regulations.

The Bank does not use or disclose your sensitive personal information for purposes that, with limited exceptions, are not necessary for the application or employment related purpose for which we collect it or as reasonably expected by an average individual in this context or for other permitted purposes under the CCPA or as authorized by regulation.

3. The Right to Correct Inaccurate PI

You have the right to request that we correct any inaccurate PI that we maintain about you, taking into account the nature of the PI and the purposes of the processing of the PI.

4. The Right to Delete PI

You have the right to request that we delete any PI about you which we have collected from you.

NOTE: The Bank does not have to comply with any deletion requests if the PI is reasonably necessary for the business, service provider, or contractor to maintain this information for legitimate business purposes for which the information was collected and/or to address regulatory or legal requirements.

5. The Right of No Retaliation

You have the right to be free from retaliation and discrimination for exercising any of these rights under the California Consumer Privacy Act.

The Bank does not sell or share, as those terms are defined under the CCPA, the above categories of personal information. We do not have actual knowledge that we sell or share the personal information of individuals under the age of 16 years.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or in part, where exceptions under the applicable law apply.

EXERCISING YOUR RIGHTS

If you are a California resident applicant, employee, or former employee, you can submit a request for any of the rights listed above by either emailing HRBP@ozk.com or calling (844)368-9567.

Except as described in this Privacy Notice or as provided under the CCPA/CPRA, you will not be charged for exercising of your rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may:

- Charge a reasonable fee for responding to your request, taking into account the administrative costs of providing the information or taking the action requested; or
- Refuse to act on the request and notify you of the reason for refusing the request.

What to submit. If we request, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of the individual. In general, we may ask you to provide identifying information that we already maintain about you or we may use a third-party verification service. In either event, we will try to avoid asking you for sensitive personal information to verify your identity. We may not be able to 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. However, making a verifiable request does not require you to create an account with us.

Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will not use the personal information we collect from an individual to determine a verifiable request for any other purpose, except as required or permitted by law.

Our response. We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you

as to why we made that decision and provide a cost estimate before completing your request. We will endeavor to respond to a verifiable request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

Authorized Agent. You may authorize a natural person or a business (the Agent) to act on your behalf. When you submit a Request to Know, Correct, or Delete, the Agent must provide proof that you gave the Agent signed permission to submit the request, and you must either (i) verify your own identity with the business or (ii) directly confirm with us that you provide permission to the Agent. However, these steps are not required when you have provided the authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

Spouses, Dependents, and Associates. If you have knowledge that the Bank collected personal information related to your spouse, dependent, or associate, please share a copy of this notice with all such individuals.

We reserve the right to amend this notice at any time without advance notice. Please direct questions about this Notice by calling (844)368-9567 or emailing us at HRBP@ozk.com.

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