

# California Consumer Privacy Act (CCPA) Notification of Collection and Privacy Policy Disclosure

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## Introduction

Under California Consumer Privacy Act of 2018 (“CCPA”), Woori America Bank (“Bank,” “we,” or “us”) is required to disclose California residents with a number of privacy-related rights.

The rights and protections contained in the CCPA apply to “Consumers,” which the Act defines as natural persons residing in California or California residents who are outside California for transitory purposes. The Act contains several exemptions from coverage. Please note that the following disclosures do not apply to Woori America Bank’s job applicants, employees, contractors, owners, directors, or officers where the personal information we collect about those individuals relates to their current, former, or potential role at Woori America Bank.

The California Consumer Privacy Act Disclosure provided pursuant to CCPA explains how we collect, use and disclose personal information related to California residents. The CCPA, however, does not apply to certain personal information that is subject to the Gramm-Leach-Bliley Act (“GLBA”).

## Rights under the CCPA

If you are a California resident, you may have certain rights regarding your personal information, including:

- the right to know and request the following information in the preceding twelve (12) months:
  - a. the categories of personal information we collected;
  - b. the categories of sources used to collect the personal information;
  - c. the business or commercial purposes for collecting your personal information;
  - d. the specific pieces of personal information we collected about you; and
  - e. the categories of third parties with whom we share your personal information
- the right to request deletion of your personal information that we collected except to the extent we have a basis for retention under applicable law;
- the right to have someone you authorize make a request on your behalf
- the right to correct inaccurate personal information we have about you; and
- the right not to be discriminated against for exercising your rights under the CCPA.

## Notice at Collection

The California Consumer Privacy Act requires that Woori America Bank inform Consumers, at or before the time of collection of a Consumer’s personal information, of the categories of personal information collected and the purpose for which the categories of personal information will be used.

## Collection of Personal Information

The following information provides the types of personal information we may collect, the reason for collection and sources in how we collect the data from California residents who are covered under CCPA.

CATEGORIES OF PERSONAL INFORMATION	PURPOSE(S) FOR WHICH IT WILL BE USED	SOURCES FROM WHICH THE INFORMATION WAS COLLECTED
<b>Personal identifiers</b> , including those listed in other California statutes: Real name; alias; Social Security number; passport number; other government issued number; Green Card number; driving license number; telephone number; email address; postal address; account name; online identifier; device identifier; IP address	<ul style="list-style-type: none"> <li>• Offering Financial Products / Performing Services</li> <li>• Verifying Consumer Identities</li> <li>• Fraud Prevention</li> <li>• Regulatory/Legal Compliance</li> <li>• Marketing (internal)</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Credit Report Agencies</li> <li>• Public Records/Information (including internet searches)</li> <li>• Website/Mobile App Activity</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b> : Such as, but not limited to : race, ethnicity, age; gender; military or veteran status; marital status; nationality; citizenship	<ul style="list-style-type: none"> <li>• Offering Financial Products / Performing Services</li> <li>• Verifying Consumer Identities</li> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> <li>• Regulatory/Legal Compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Credit Report Agencies</li> <li>• Public Records/Information (including internet searches)</li> </ul>
<b>Financial Information</b> : bank account numbers; debit/credit card numbers; cardholder or accountholder name and details; transaction details	<ul style="list-style-type: none"> <li>• Offering Financial Products/Performing Services</li> <li>• Improving Bank products/services</li> <li>• Verifying Consumer Identities</li> <li>• Regulatory/Legal Compliance</li> <li>• Fraud Prevention</li> <li>• Marketing (internal)</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Credit Report Agencies</li> <li>• Website/Mobile App Activity</li> </ul>
<b>Biometric information</b> : fingerprint; voice recordings;	<ul style="list-style-type: none"> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> </ul>
<b>Commercial Information</b> : records of personal property; products and service purchased, obtained or considered; purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> <li>• Offering Financial Products/Performing Services</li> <li>• Improving Bank products/services</li> <li>• Verifying Consumer Identities</li> <li>• Regulatory/Legal Compliance</li> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> <li>• Background Screening for Employees</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Credit Report Agencies</li> <li>• Public Records</li> </ul>
<b>Professional or Employment</b> : title; salary; employment files; references	<ul style="list-style-type: none"> <li>• Offering Financial Products/Performing Services</li> <li>• Background Screening for Employees</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Credit Report Agencies</li> <li>• Public Records/Information (including internet searches)</li> </ul>

CATEGORIES OF PERSONAL INFORMATION	PURPOSE(S) FOR WHICH IT WILL BE USED	SOURCES FROM WHICH THE INFORMATION WAS COLLECTED
<b>Education information:</b> details of your education and qualifications	<ul style="list-style-type: none"> <li>• Offering Financial Products/Performing Services</li> <li>• Background Screening for Employees</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Public Records/Information (including internet searches)</li> </ul>
<b>Internet or other electronic network activity information:</b> browsing history, search history, information regarding your interaction with a website or advertisement	<ul style="list-style-type: none"> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Website/Mobile App Activity</li> </ul>
<b>Geolocation data:</b> any information used to identify device or Internet Protocol (IP) location	<ul style="list-style-type: none"> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> <li>• Regulatory/Legal Compliance</li> <li>• Marketing (internal)</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Website/Mobile App Activity</li> </ul>
<b>Sensory Data:</b> audio, electronic, visual, or similar information, such as call or video recordings	<ul style="list-style-type: none"> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> <li>• Regulatory/Legal Compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Website/Mobile App Activity</li> </ul>
<b>Inferences:</b> Any derivation of information, data, assumptions, or a profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes	<ul style="list-style-type: none"> <li>• Offering Financial Products/Performing Services</li> <li>• Improving Bank products/services</li> <li>• Verifying Consumer Identities</li> <li>• Regulatory/Legal Compliance</li> <li>• Detecting/Preventing Security Incidents</li> <li>• Fraud Prevention</li> <li>• Marketing (internal)</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from the Consumer</li> <li>• Service Providers</li> <li>• Credit Report Agencies</li> <li>• Public Records/Information (including internet searches)</li> <li>• Website/Mobile App Activity</li> </ul>

## Use and Disclosure of Sensitive Personal Information

While some of the information that we collect may be considered sensitive personal information, Woori America Bank uses and discloses sensitive personal information for those purposes that are authorized by law. For example, Woori America Bank may process your sensitive personal information in order to perform the services or provide the goods you request from us or to verify customer information. We do not use or disclose sensitive personal information in such a manner that requires the right to limit the use or disclosure of sensitive personal information.

## Disclosure of Personal Information to Third Parties

The following information provides the categories third parties to whom your personal information is disclosed.

### Categories of Third Parties to Whom Personal Information is Disclosed

- Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, information technology and related infrastructure,
- Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, vehicle loan processes and aggregators (at the direction of the customer)
- Governmental, legal, regulatory, or other similar authorities and/or local government agencies, upon request or where required
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas

and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties

## **Retention of Personal Information**

We will retain your Personal Information until the information is no longer necessary to accomplish the purpose for which it was provided. We may retain your information for longer periods for specific purposes to the extent that we are obliged to do so in accordance with applicable laws and regulations, to protect you, other people, and us from fraud, abuse, and unauthorized access, as necessary to protect our legal rights, or for certain business requirements.

## **Sale and Sharing of Personal Information**

Woori America Bank does not engage in the sale of personal information subject to the CCPA, including personal information of minors under the age of 16. We do not share or disclose personal information to a third-party for the sole purpose of receiving compensation for the information or for cross-context behavioral advertising.

## **How to Exercise Your Rights**

If you are a California resident, you may submit a request by:

(1) Completing an Online Personal Information Request Form located at:

[[www.wooriamericabank.com/forms](http://www.wooriamericabank.com/forms)]

(2) Completing a Printer-Friendly Version (PDF) Form and sending it to:

Woori America Bank  
330 Fifth Avenue, Third Floor  
New York, NY 10001  
Attn: Business Strategy Department  
Or  
[cs@wooriamericabank.com](mailto:cs@wooriamericabank.com)

Or, hand delivering it to your nearest Woori America Bank branch. (Form can be requested at branch)

(3) Calling:

1-888-699-6674  
Call Center Business Hours  
Mon-Fri: 9:00 am – 4:00 pm (EST)  
Sat & Sun: Closed

## **Verification of Your Identity**

Once we receive your request, we will take steps to verify your identity before processing any of the above requests. If you maintain an account with us, we may verify your identity through existing authentication practices for the account (e.g. login and password). If you do not have an account with us, we will verify your identity by matching two or three data points that you provide with data points that we maintain and have determined to be reliable for the purposes of verification (e.g. name, email, address).

## **Use of an Authorized Agent**

Use of an authorized agent (registered with the State of California to conduct business in California) is permitted to submit a request to know or a request to delete utilizing the aforementioned submission methods, however, the Bank will require:

- Written Authorization;
- Verification of identity of the consumer (you) authorizing the agent; and
- Direct confirmation with the consumer (you), that authorization was granted permission to submit the request

This section does not apply to authorized agents with power of attorney pursuant to Probate Code sections 4000 to 4465.

## **Contact for More Information**

If you have any questions, concerns or would like additional information regarding this policy and/or the Bank's practices regarding this policy, please call 1-888-699-6674 or send an email to [cs@wooriamericabank.com](mailto:cs@wooriamericabank.com).

## **Changes to this CCPA Disclosure**

We may change this disclosure from time to time. When we do, we will let you know by appropriate means such as by posting the revised disclosure on our website with a new "Last Updated" date. Any changes to this disclosure will become effective when posted unless indicated otherwise.

A copy of this policy as well as the Bank's General Privacy Policy can be located on the Bank's website:

[www.wooriamericabank.com](http://www.wooriamericabank.com)