



## Notice at Collection of Personal Information

Effective as of: January 1, 2020

Last Updated: December 2023

### California residents — Your privacy rights

#### What we collect and how we collect it

We collect information from residents of California ("individuals") that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked to, directly or indirectly, a person or household ("personal information") as defined by California law. Sensitive personal information is a subset of personal information that can include the individual's government identifiers, financial information, precise geolocation, race, religion, philosophical beliefs or union membership, communications, genetics, biometrics, health, sexual orientation, or citizenship and immigration status. Specifically, CIBC collects the following categories of personal information and sensitive personal information:

#### Personal Information

Category	Examples
Identifiers	A real name, alias, email, telephone number, residential or business address, mailing address, unique identifiers for customer service and data analytics
Demographic information	Age, marital status, gender
Professional or employment-related information	Current or past job history
Internet or other similar network activity	Browsing history, cookie information
Customer information	Records of personal property, products or services purchased or obtained, or considered, or other purchasing or consuming histories or tendencies
Correspondence	Records related to correspondence sent and received by CIBC regarding financial services
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics
Geolocation	To help serve the appropriate CIBC website or provide suggestions based on physical location
Audio, electronic, visual, or similar information	Call recordings to support customer service

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## Sensitive Personal Information

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Government issued identification numbers	A consumer's Social Security Number or Social Insurance Number, driver's license, state or provincial identification card, or passport number, including any details such as issue and expiry dates and personal address
Financial Information	A consumer's account log-in, financial account, debit card or credit card number combined with any required security or access code, password or credentials allowing access to an account. Financial account information includes background checks, financial institution account number, banking details, financial transaction history, credit history, credit bureau, insurance claim history, customer purchase history, audit reports, budgets and unreleased financial results, vendor agreements, or any other financial information.
Precise location	When enabled on your mobile application, to share location of the nearest ATM/ABM machines
Protected characteristics	Race, ethnicity, sex life or sexual orientation collected as part of inclusion and diversity initiatives, or as necessary to comply with applicable laws
Citizenship and immigration status	To ensure eligibility for financial services and products, comply with anti-money laundering and taxation laws

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Personal information covered by other privacy laws, like the Gramm-Leach-Bliley Act, is exempt under the CCPA. This means information collected, processed, sold or disclosed to provide you a financial service or product can't be included in this notice or considered when you make a CCPA individual rights request.

CIBC may obtain the categories of personal information listed, both directly and indirectly:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our website.
- From business partners. For example, your employer or your employer's service providers, such as payment initiation providers.

## How we use and retain your information

We may use the personal information we collect for one or more business purposes as described below:

- To fulfill or meet the reason you gave the information. For example, if you provide your name and contact information to ask for a quote or ask a question about our products or services
- To comply with capital markets trading or banking regulatory requirements
- 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, purchases, transactions and payments and prevent transactional fraud
- To personalize your website experience and deliver content, 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 respond to law enforcement requests and, as required by applicable law, court order or government regulations
- As we described to you when collecting your personal information or as otherwise permitted by law

We do not use or disclose sensitive personal information, as defined by California law, for inferring characteristics or for purposes other than those permitted by law. We keep personal information as long as it is necessary or relevant for the purposes for which it was collected. We also keep information as required by law.

## What we disclose and to whom

We disclose several categories of personal information with service providers for a business purpose:

- Identifiers
- Demographic information
- Professional or employment-related information
- Internet or other similar network activity
- Customer information
- Inferences drawn from other personal information
- Financial information

For example, these service providers include vendors that help us send you email communications or help us operate our website.

We will also disclose personal information if we think we have to in order to comply with the law or to protect ourselves. For example, we may share information in response to a court order or subpoena, or to a request made by a government agency or investigatory body, including U.S. and non-U.S. law enforcement or regulatory authorities.

As part of a merger, acquisition, or other sale or transfer of all or some of our assets, or as part of a bankruptcy or financing, we may disclose all categories of personal information.

## How to exercise your rights

You can exercise your CCPA rights or ask for more information in two ways:

- Fill out and submit the [CIBC Individual Rights Form](#)
- Call one of our agents at 800--662--7748

We can't respond to your request or provide you with personal information if we can't confirm your identity or authority to make the request and confirm the personal information relates to you. You don't need to have an account with us to make a verifiable request.

## Your California privacy rights

As a California resident, you have certain rights with respect to your personal information. You may directly exercise these rights or designate an authorized agent to make a request on your behalf. If you are a minor under 16 years of age, your parent or guardian may make a verifiable request on your behalf.

Under CCPA, you may only make a verifiable request for access twice within a 12-month period. The verifiable request must include certain criteria:

- Enough information that lets us reasonably confirm you're the person about whom we collected personal information or an authorized representative
- Enough detail in your request that lets us properly understand, evaluate and respond to it

## Access to specific information rights

Subject to certain exceptions, you have the right to know what personal information CIBC has collected about you and our use of your personal information for the period during which we retain the personal information for business purposes. Once we receive and confirm your verifiable request, we'll provide you with this information:

- 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 that personal information
- The categories of third parties with whom we disclose that personal information
- The specific pieces of personal information we collected about you
- If we disclosed your personal information for a business purpose, we'll provide a separate list of disclosures for a business purpose. We'll identify the personal information categories that each category of recipient received

## Deletion request rights

You have the right to ask us to delete any of the personal information we collected from you and kept, with certain exceptions. Once we receive and confirm your verifiable request, we'll delete your personal information from our records, unless there's an exception.

## Correction rights

Subject to certain exceptions, you have also have the right to ask us to correct any inaccurate personal information we collected from you and kept. Once we receive and confirm your verifiable request, we'll correct your personal information within our records.

## Antidiscrimination rights

You have the right to not receive discriminatory treatment for exercising your privacy rights.

## Do not sell or share rights

CIBC doesn't sell personal information, meaning under California law, that we do not provide personal information to a third party for monetary or other valuable consideration. We do not sell personal information of minors under the age of 16. We also do not share personal information, meaning under California law, that we do not provide personal information to third parties for cross-context behavioral advertising.

## General questions

If you have questions, please contact CIBC's US Client Support Center at 877--448--6500.

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