

# CALIFORNIA CONSUMER PRIVACY ACT

## PRIVACY POLICY

The purpose of this Privacy Policy (“Policy”) is to provide consumers covered under the California Consumer Privacy Act a comprehensive description of the practices of First Foundation Inc. regarding the collection, use, disclosure, and sale of personal information and of the rights of consumers regarding their personal information.

### Background

The California Consumer Privacy Act (CCPA) became effective as of January 1, 2020. The CCPA grants individual California consumer residents the rights outlined below and is subject to some restrictions.

### Definitions

The following terms you will see in this First Foundation Inc. CCPA POLICY are defined below:

“We” “our” “us” “First Foundation” means First Foundation Inc., First Foundation Advisors, First Foundation Bank

“You” “your” or “consumer” refer to a natural person who is a California Resident

“Personal Information” “PI” or “Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. “Personal Information” does not include information that is publicly available (which means information that is lawfully made available from federal, state, or local government records).

### Collection of Personal Information

Below is a list of categories of personal information we have collected about consumers in the preceding 12 months. For each category identified we have also provided the categories of sources from which we collected the personal information, the business or commercial purpose for collecting the information, and the categories of third parties with whom we share the personal information.

### Purposes.

The business and commercial purposes for which we collect personal information as disclosed below are defined as follows:

- **Employment Processing:** Means to use personal information in order to perform services in connection with a consumer’s role, responsibility, and/or status as a job applicant to or an employee, owner, director, officer, or contractor of First Foundation Inc. This includes but is not limited to administering payroll or benefits, maintaining compliance with internal policies and procedures, and to comply with applicable federal and state employment laws.
- **Operational Processing:** Means to use personal information in order to perform services and enforce our rights in connection with the financial products or services we provide, including but not limited to, opening, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying information, processing payments, providing financing, advertising or marketing other products and services to you or other similar activities.
- **Security Purposes.** Means to use personal information to detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity.
- **Internal Research & Development Purposes.** Means to use personal information to undertake internal research activities to verify or maintain the quality or safety of a service that is owned or controlled by us and to develop, verify, improve, upgrade, or enhance our services.
- **Marketing Purposes.** Means to use personal information to market our products and services.
- **Auditing Purposes.** Means to use personal information in connection with activities to audit and/or achieve compliance with our policies and procedures or applicable legal and regulatory standards.
- **Debugging Purpose.** Means the use of personal information for debugging to identify and repair errors that impair existing intended functionality of our services.

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**Collection of Personal Information**

Over the last 12 months, we have obtained the categories of personal information listed below. The table below summarizes the categories of personal information, the categories of sources from which that personal information First Foundation Inc. may have collected, the business or commercial purpose(s) for which the information was collected, and categories of third parties with whom we have shared personal information.

<b>Categories of PI We Collect</b>	<b>Examples of PI</b>	<b>Categories of Sources from Which We Collect the PI</b>	<b>Our Business or Commercial Purpose for Collecting the PI</b>	<b>Third Parties With Whom We Share the PI</b>
<b>Identifiers</b>	A real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	From you directly or those acting on your behalf when you use our services, apply for a job with us or when acting as an employee, owner, director, officer or contractor of First Foundation Inc., government entities, job listing websites.	Employment processing, security purposes, financial processing, internal research & development purposes, auditing purposes, marketing purposes.	Government entities, the serviced providers we utilize to operate our financial products and to perform services and administer benefits to job applicants, employees, owners, directors, officers and contractors of First Foundation. The operating systems and platforms our business runs on.
<b>Personal Information categories listed in the California Records statute (1798.80(e))</b>	A real 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.	From you directly or those acting on your behalf when you use our services, apply for a job with us or when acting as an employee, owner, director, officer or contractor of First Foundation Inc., government entities, job listing websites.	Employment processing, security purposes, financial processing, internal research & development purposes, auditing purposes, marketing purposes.	Government entities, the serviced providers we utilize to operate our financial products and to perform services and administer benefits to job applicants, employees, owners, directors, officers and contractors of First Foundation. The operating systems and platforms our business runs on.

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<p><b>Protected classifications under California or federal law</b></p>	<p>Age, race, citizenship, marital status, sex, veteran or military status.</p>	<p>From you directly or those acting on your behalf when you use our services, apply for a job with us or when acting as an employee, owner, director, officer or contractor of First Foundation Inc., government entities, job listing websites.</p>	<p>Employment processing, security purposes, financial processing, internal research &amp; development purposes, auditing purposes, marketing purposes.</p>	<p>Government entities, the serviced providers we utilize to operate our financial products and to perform services and administer benefits to job applicants, employees, owners, directors, officers and contractors of First Foundation. The operating systems and platforms our business runs on.</p>
<p><b>Commercial information</b></p>	<p>Records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies.</p>	<p>From you directly when you use our services, apply for products and government entities.</p>	<p>Financial processing, internal research &amp; development purposes.</p>	<p>Government entities, the serviced providers we utilize to operate our financial products and to perform services and administer benefits to job applicants, employees, owners, directors, officers and contractors of First Foundation. The operating systems and platforms our business runs on.</p>
<p><b>Biometric information</b></p>	<p>Fingerprints, voiceprints, security cameras.</p>	<p>From you directly when acting as an employee, owner, director, officer or contractor of First Foundation Inc., security cameras in our branch locations.</p>	<p>Employment processing, security purposes, auditing purposes, internal research &amp; development purposes and financial processing.</p>	<p>Government entities, the serviced providers we utilize to operate our financial products and to perform services and administer benefits to job applicants, employees, owners, directors, officers and contractors of First Foundation. The operating systems and platforms our business runs on.</p>

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<p><b>Internet or other electronic network activity information</b></p>	<p>Browsing history, search history, information on your interaction with a website, application or advertisement. Mobile device settings, unique device identifiers, information about your location, and analytical information. For your convenience, you may be asked to grant permission for access to your mobile device's geolocation data. This information may be collected when you use certain services that are dependent on your mobile device's location (such as the location of an ATM or in store transactions).</p>	<p>From you directly or other acting on your behalf when you use our online services, such as our online banking platform and mobile Apps.</p>	<p>Employment processing, diagnostics and performance, security purposes and auditing purposes, to comply with regulatory requirements.</p>	<p>Our internet service providers and operating systems and platforms, government entities as required by law.</p>
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**Disclosure or Sale of Personal Information**

First Foundation collects and may share your personal information to a third party for a business purpose related to servicing your account, offering of our products and services to you, or to perform a request made by you. Additionally, we may share your information to detect and mitigate potential fraud, respond to law enforcement requests for information, and as required by applicable law, comply with a court order, or government regulation.

When we disclose personal information to third parties, we enter into a binding contract that describes the purpose of sharing the information and requires the recipient to keep the personal information confidential and not use it for any purpose except performing the contract.

We will not collect additional categories of personal information or use the personal information we collected for different or unrelated purposes without providing you notice.

**Selling of Your Personal Information**

First Foundation does not engage in the selling of consumers' personal information as defined under the CCPA.

**Right to Know About Personal Information Collected, Disclosed or Sold**

Under the CCPA, you have the right to request First Foundation disclose what personal information it collects, uses, and sells about you.

**Right to Request Deletion of Personal Information**

The CCPA grants certain consumers the right to request First Foundation delete personal information collected and maintained in its records. Once we have received your request and verified your identity, we will review your request and act upon your request.

**Information Required for Submitting a Verifiable Request to the Bank**

Using any of the methods described below under the “Contact Us” section, please provide the following pieces of information (if applicable):

1. Your first and last name, including your middle initial if applicable
2. A telephone number where you can be reached during business hours
3. Your account number (if you have one)
4. Email address
5. Your physical address

Once we receive your request, we will contact you within five business days to follow up on your request.

Before disclosing any information, we will verify your identity. Once we have verified your identity we will respond within 45 days of receiving your request. We will deliver our written response by mail or electronically, at our option. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity, specifically by electronic mail communication.

If your identity cannot be verified, we will attempt to contact you to gather additional information. If we are not successful in our attempts, we will notify you that your request has been denied due to the inability to verify your identity.

**Right to Opt-Out of the Sale of Personal Information**

You have the right, under the CCPA to opt-out of the sale of your personal information. First Foundation does not sell consumer personal information.

**Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights**

You have the right to exercise any rights given by the CCPA. Consumers will not be discriminated against for exercising any of their rights under the CCPA. This means First Foundation will not deny services, charge differential pricing, or provide different service levels to consumers to who exercise their privacy rights.

**Designating an Authorized Agent**

Consumers can assign an authorized agent to act on his/her behalf and exercise rights under the CCPA. Please contact us for more information.

**Contact Us**

To submit a request or if you have questions or concerns regarding this notice or you wish to exercise your rights under the CCPA, please contact us:

**You may begin your request here:** [\[SUBMIT A REQUEST\]](#)

**Call:** (888) 830-4199 Ask to be directed to the Privacy Officer

**Email us:** [CCPA@ff-inc.com](mailto:CCPA@ff-inc.com)

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