

HINGHAM INSTITUTION FOR SAVINGS - CALIFORNIA PRIVACY NOTICE

Last Updated: November 25, 2024

This California Privacy Notice (“Notice”) describes how Hingham Institution for Savings (“the Bank,” “us,” “our,” or “we”) collects, uses, discloses, and otherwise processes Personal Information pursuant to the California Consumer Privacy Act, as amended from time to time (“CCPA”).

For purposes of this Notice, “Personal Information” means information that identifies, relates to, describes references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual who is a California resident (“Consumer”).

Personal Information includes sensitive Personal Information, and does not include publicly available, deidentified, or aggregated information. All other terms defined in the CCPA or its implementing regulations have the same meanings when used in this Notice.

Consumers may access this Notice in an alternative format by contacting 781-749-2200. If you are a customer of the Bank for personal, family, or household purposes (or apply for a Bank product or service for such purposes), please see our Privacy Notice here: [Privacy Notice Link](#).

We may add to, delete, or change the terms of this Notice from time to time. Any changes to this Notice will be effective as of the Last Updated date at the top of this page, unless otherwise expressly indicated.

Unless otherwise noted, the disclosures herein describe our current practices, as well as our practices in the preceding 12 months.

Categories of Personal Information We Collect

We collect the following categories of Personal Information about Consumers. Note that the Personal Information we collect about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

- **Identifiers**, such as your name, alias, postal address, unique personal identifier, online identifier, IP Address, email address, account name, or other similar identifiers. We may also collect sensitive Personal Information, such as social security number or government-issued identification number (e.g., driver’s license, state identification card, or passport number).
- **Personal Information described in Cal. Civ. Code § 1798.80(e)**, such as a signature, telephone number, insurance policy number, employment, bank account or card number, other financial information, and any similar information.
- **Characteristics of protected classifications under state or federal law**, such as date of birth, gender, or marital status. We may also collect sensitive Personal Information, such as racial or ethnic origin.

- **Commercial information**, such as records of personal property, products, or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Internet or other electronic network activity information**, such as internet or other similar activity, search or browsing history, information on your interactions with a website, device data, or social media account information.
- **Geolocation data**, such as a device or IP Address location. We may also collect sensitive Personal Information, such as precise geolocation, including for fraud detection purposes.
- **Audio, electronic, visual, or similar information**, such as audio recordings when you call a recorded line.
- **Professional or employment information**, such as your title and affiliated Bank.
- **Inferences** drawn from any other category of Personal Information to create a profile about an individual reflecting potential or probable preferences, characteristics, behavior, abilities, attitudes, intelligence, aptitudes, or other similar predispositions.

Sources From Which We Collect Personal Information

We collect the categories of Personal Information identified above from the following sources:

- Directly from you
- Automatically when you use our websites
- Credit reporting agencies
- Our service providers and other vendors
- Persons and entities with whom you perform transactions with
- Your affiliated Bank
- Government entities
- Social networks
- Data brokers

How We Use Personal Information

We collect the categories of Personal Information identified above for the following business or commercial purposes:

- **Operational purposes**, such as providing services for ourselves, our customers or others, including maintaining and servicing accounts; managing applications and registrations; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; engaging in advertising or marketing, performing analytics, or similar services; improving our services; and responding to your requests.
- **Commercial purposes**, such as activities that advance our commercial or economic interests (e.g., activities that induce customers to obtain or maintain products and services with us) or that enable or effect transactions.

- **Quality Assurance purposes**, such as activities to achieve, verify, or maintain the quality or safety of a product, service, or equipment that is furnished or controlled by us, or to improve such product, service, or equipment.
- **Security purposes**, such as activities to protect against malicious, deceptive, fraudulent, or illegal activity; detect security incidents; or hold the perpetrators of that activity responsible.
- **Debugging purposes**, such as debugging to identify and repair errors that impair existing or intended functionality.
- **Compliance purposes**, such as activities to achieve, verify, or maintain compliance with our policies and procedures or applicable legal and regulatory standards.
- **Audit purposes**, such as auditing compliance with our policies and procedures or applicable legal and regulatory standards.

Disclosures of Personal Information

We disclose Consumer Personal Information to:

- **Service providers, and contractors** that help us to administer our business, support business activities, manage customer accounts, deliver services and communications, administer loans and other financial products, provide technical support, process payments, provide advertising technology and other online services, and otherwise help us operate our business.
- **Law enforcement agencies, courts, regulatory agencies, other government entities, professional advisors, affected parties, and other external parties** in response to subpoenas, warrants, or court orders; for law enforcement or public safety purposes; in connection with any legal process; to investigate, prevent, or take action regarding possible illegal activities, fraud, safety of person or property, or a violation of our policies; to comply with laws, regulations, or other legal obligations; to protect and defend our rights and property or the rights and property of other parties; or to enforce our Terms of Use, this Notice, or agreements with third parties.
- **Parties to corporate transactions**, such as prospective or actual purchasers, investors, or successor entities, in connection with a contemplated or an actual reorganization of our business, or in connection with financing, a sale, or other transaction involving the disposal of all or part of our business or assets. This may include processing for the purpose of permitting the due diligence required to determine whether to proceed with a transaction.

We may disclose your Personal Information to additional parties where we have provided a separate notice to you and/or asked for your consent, as applicable.

Sale or Sharing of Personal Information

We do not sell or share your Personal Information. We do not share or disclose your sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA. We do not sell or share the Personal Information of Consumers under 16 years old.

The Retention Period for the Personal Information Collected from Consumers

We retain the Consumer Personal Information described in the “Categories of Personal Information We Collect” section above as long as necessary to fulfill the purposes for the collection or as otherwise authorized by law. Generally, Personal Information is retained for the duration of your relationship with us, plus any legally and or contractually required record or data retention period. In addition, Personal Information is retained for as long as one of the following apply:

- The Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- The Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected; or
- The Personal Information is reasonably required to protect or defend our rights or property and/or protect our ability to exercise those rights.

Where Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

Rights Under The CCPA

As a California resident, you have the following privacy rights regarding your Personal Information:

- The right to know and access the Personal Information we have collected about you, including:
 - The categories of Personal Information that we process;
 - The categories of sources from which the Personal Information is collected;
 - Our business purpose for collecting or processing Personal Information;
 - The categories of recipients to whom we disclose Personal Information; and
 - The specific pieces of Personal Information that we have collected.
- The right to delete Personal Information that we have collected from you, subject to certain exceptions.
- The right to correct inaccurate Personal Information that we maintain about you.

We will not discriminate against you for exercising your privacy rights.

Exercising Your Privacy Rights

If you wish to exercise your rights, you may:

- Complete the [Request Form](#);
- Call our customer service number at 781-749-2200 and provide us with the information needed to complete our request form; or
- Complete the request form with a Bank representative at any of our branch locations.

Note that to process your request, we will require you to verify your identity.

You may use an authorized agent to request access to, correction of, or deletion of your Personal Information. Further, we will require you or your authorized agent to provide us with information to verify your identity. We may also require you to either verify your own identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

Contact For More Information

If you have any questions or concerns regarding this Notice or our privacy practices, you can contact us by:

- Calling us at 781-749-2200; or
- Writing us at: 55 Main Street, Hingham MA, 02043; or
- Stopping by any of our branch locations during normal business hours.