

1. Introduction

The Western Bankers Association (WBA) is committed to protecting your personal data.

This Privacy Policy applies to the websites, online services and mobile applications controlled by WBA ("WBA," "we," "us," or "our") where this Privacy Policy is posted (the "Services"). This Privacy Policy applies to all users, including both members and non-members of WBA, those who use the Services without being registered with or subscribing to a WBA service, and those who have registered with or subscribed to a WBA service. Please read this Privacy Policy carefully because by using the Services or purchasing products or services from us, you agree to be bound by this Privacy Policy.

This list includes these sites and their subdomains (but not limited to):

- www.westernbankers.com
- www.calbankers.com
- <https://wibeducate.org>

2. The information we collect

The WBA collects (i) data supplied by you when you apply for membership in WBA; (ii) personal data voluntarily supplied by you when you register on the Services, and (iii) tracking information collected as you navigate the Services. In particular, the WBA collects the following information from and about you:

- **Registration information** – Registration information is information you submit to register for a WBA service, for example, to create an account, make a purchase, register for an event, enroll in a course, post comments, or receive a newsletter, and may include, but is not limited to, first name, last name, and email address.
- **Sensitive data** – We may collect limited sensitive data related to attendance at WBA events only as provided by you and with your consent, dietary restrictions and disability accommodations information.
- **Public data and posts** – This may consist of comments or content that you post on the Services and the personal information about you that accompanies those posts or

content, which may include a name, user name, or comments. Public information and posts are always public, which means they are available to everyone and may be displayed in search results on external search engines.

- **Research** – If you have purchased our products or services or registered for events, education or other programs, we may request that you complete surveys, evaluations form and/or market research and collect your responses.
- **Activity data** – When you access and interact with the WBA services, we may collect certain information about those visits. For example, in order to permit your connection to the WBA services, our servers receive and record information about your computer, device and browser, including potentially your IP address, browser type, and other software or hardware information.
- **Cookies, web beacons and similar technologies** – Cookies are small text files placed on your device that uniquely identify your device and which a website can transfer to a consumer's hard drive to keep records of his or her visit to a website. Web beacons are transparent image files used to monitor your journey around a single website or collection of sites. Web beacons may be used in association with cookies to understand how visitors interact with the pages and content on the pages of a web site. These and related technologies may be used to collect and store information about your usage of the WBA Services, such as pages you have visited, other content you have viewed, search queries you have run and advertisements you have seen.

3. How do we use the information we collect?

We use the personal information we collect from and about you to:

- Provide our Services, features, products, services, educational programs, and events to you;
- Measure and improve those services and features;
- Provide you with customer support and to respond to inquiries;
- Protect the rights of the WBA and others. There may be instances when we may disclose your personal information, including situations where we have a good faith

belief that such processing is necessary in order to: (i) protect, enforce or defend the legal rights, privacy, safety or property of the WBA, our affiliates or their employees, agents and contractors (including enforcement of our agreements and terms of use); (ii) protect the safety, privacy and security of users of our Services or members of the public; (iii) protect against fraud or for risk management purposes;

- Send marketing communications customized to your interests and needs in accordance with applicable law;
- Send surveys, evaluations or research questionnaires related to our products, services, events, educational and related programs;
- Send advocacy communications and voter information;
- Comply with applicable laws or legal process and/or respond to requests from public and government authorities.

4. What is the Legal Basis for the Way We Process Your Information?

We process personal information per applicable law and with transparency and fairness.

Our processing activities are conducted:

- With your consent;
- In order to fulfill our contractual obligations to you;
- For the legitimate purpose of operating our business, including to improve and develop our services, for fraud prevention purposes, and to improve use experience;
- As otherwise in compliance with law.

5. How Your Personal Information is Shared

The WBA may share your personal information for the purposes of Section 3 above to the following categories of recipients:

- **Service providers**, helping to administer the Services, products, services, educational programs and events;
- **Subsidiaries and affiliates** to better serve the WBA membership and its evolving needs;
- **Sponsors and Exhibitors** of our events;

- **Third parties** who provide products and services of interest to WBA members;
- **Other association members** for the purpose of performing trade association business;
- **Companies** which may be the result of any mergers, acquisitions, asset sales, joint ventures, etc.;
- **Data Analytics Platforms**, such as Google Analytics, to compile statistics and perform analysis intended to improve our services and user experience;
- **Audience Data Providers** we may also work with, such as Facebook, Twitter, LinkedIn and others, to receive audience based data (such as pixel traffic and conversion data) from them based on non-identifiable information such as IP addresses;
- **Competent authorities**, including law enforcement, in order to comply with applicable laws or court orders.

6. Your rights with regard to your personal information

We give you choices regarding our use and disclosure of your personal information for marketing purposes. You may withdraw your consent to:

- **Receiving electronic communications from us** – If you no longer want to receive marketing-related emails from us, you may opt-out of receiving these by following the unsubscribe link in our communications or sending a request to the email or postal address in Section 14 of this Privacy Policy.
- **Our sharing of your personal information with WBA affiliates or business partners for their marketing purposes** – If you would prefer that we do not share your personal information with WBA affiliates or business partners for their direct marketing purposes, you may opt-out of this sharing by following the unsubscribe link in the communications or sending a request to the email or postal address in Section 14 of this Privacy Policy.

Remember that even after you cancel your account, or if you ask us to delete your personal information, copies of some information from your account may remain viewable in some circumstances where, for examples, you have shared information with other services. We may also retain backup information related to your account on our servers for some time after cancellation or your request for deletion, to comply with applicable law.

7. Your California Privacy Rights

California law permits residents of California to opt-out of the WBA's disclosure of personal information to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your personal information with third parties for marketing purposes at any time by contacting us at communications@westernbankers.com. Please note that this opt-out does not prohibit disclosures made for non-marketing purposes. California law also permits residents of California to request and obtain from us once per year, free of charge, a list of the third parties (if any) to whom we have disclosed personal information for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an email to communications@westernbankers.com. The email subject line must include the phrase "Your California Privacy Rights," and include your name, email address or mailing address.

8. Cookies

We use, and allow certain third parties to use, cookies, web beacons and other similar technologies to enhance our Services and to help collect data. We, or third parties, may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire at thirteen months. Different cookies are used to perform different functions, which we explain below:

- **Essential** – Some cookies are essential in order to enable you to move around our websites and use their features, such as accessing secure areas of the website. Without these cookies, we cannot enable appropriate content based on the type of device you are using. These cookies allow us to remember choices you make on our websites, such as your preferred language and the country from which you are visiting, and provide enhanced, more personalized features.
- **Performance and Analytics** – We use our own cookies and/or third party cookies to see how you use our websites and services in order to enhance their performance and develop them according to your preferences. We use Google Analytics, for example, to track website usage and activity. You can opt-out of the Google Analytics

Advertising Features we use by indicating your preference using the [Google Analytics User Deletion Tool here](#). Google also provides a complete privacy policy and instructions on [opting-out of Google Analytics here](#). Note that Google's opt-out mechanism is specific to Google activities and does not affect the activities of other ad networks or analytics providers that we may use. **10. Security; Retention**

WBA takes the security and privacy of your personal information seriously. Please be aware, however, that no data transmission over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us. Understand that any information that you transfer to us is done at your own risk. If we learn of a data security systems breach we may attempt to notify you electronically regarding security, privacy, and administrative issues relating to your use of the Services. We may post a notice on the Services if a security breach occurs. We may also send an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive written notice of a data privacy or security breach.

9. Assignment

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal information we have collected from you.

10. Links to other websites

The Services contain links to other websites. The WBA is not responsible for the privacy practices of unaffiliated companies, and once you leave the WBA Services, you should read the applicable Privacy Policy of the other service.

11. Updates to this Privacy Policy

We may update this Privacy Policy from time to time, so please visit this page periodically and review for changes. We will notify you of material changes to this Privacy Policy by posting a notice on our home page for a reasonable period of time and changing the

"Effective Date" above. Your continued use of our Services following the posting of changes will constitute your acceptance of the changed terms.

12. Contact Us

Your visit to the Services is subject to both this Privacy Policy and our Terms of Use, where applicable. If you have any questions, comments or concerns regarding this Privacy Policy, please contact us by email at communications@westernbankers.com or by postal mail at:

Privacy, Western Bankers Association, 1303 J Street, Suite 600, Sacramento, CA 95814.