The following CCPA Privacy Statement shall not apply to the collection, processing, sale or disclosure of any information (i) that a consumer provides to us to obtain a financial product or service from us, or (ii) about a consumer resulting from any transaction involving a financial product or service between us and the consumer; or (iii) we otherwise obtain about a consumer in connection with providing a financial product or service to that consumer.

To better understand your rights in respect of any such information excluded from the following CCPA Privacy Statement for Covered Persons, please instead reference the BBVA Privacy page, which you may visit at https://www.bbvausa.com/policy/privacy-policy.html.

This PRIVACY STATEMENT FOR COVERED PERSONS supplements the information contained in the Consumer Privacy Disclosure of BBVA USA (“we,” “us,” or “our”) and applies solely to employees, owners, directors, officers, medical staff members, contractors and job applicants who reside in the State of California (each, a “Covered Person” and, collectively, the “Covered Persons”). We adopt this statement to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this statement. For Covered Persons, the provisions of this Privacy Statement prevail over any conflicting provisions of the BBVA USA Consumer Privacy Disclosure, the BBVA Mobile Banking Application Privacy Policy, the BBVA Online Privacy Policy, and/or the BBVA ClearSpend Service Privacy Policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Covered Person subject to the CCPA (“Personal Information”). In particular, we have collected the following categories of Personal Information from Covered Persons within the last twelve (12) months:

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
<th>Collecte d</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Identifiers.</td>
<td>A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</td>
<td>YES</td>
</tr>
<tr>
<td>B. Categories of Personal Information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</td>
<td>A 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. Some personal information included in this category may overlap with other categories.</td>
<td>YES</td>
</tr>
<tr>
<td>C. Protected classification characteristics under California or federal law.</td>
<td>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</td>
<td>YES</td>
</tr>
<tr>
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</tr>
<tr>
<td>D. Commercial information.</td>
<td>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</td>
<td>YES</td>
</tr>
<tr>
<td>E. Biometric information.</td>
<td>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</td>
<td>YES</td>
</tr>
<tr>
<td>F. Internet or other similar network activity.</td>
<td>Browsing history, search history, information on a consumer’s interaction with an internet website, application, or advertisement.</td>
<td>YES</td>
</tr>
<tr>
<td>G. Geolocation data.</td>
<td>Physical location or movements.</td>
<td>YES</td>
</tr>
<tr>
<td>H. Sensory data.</td>
<td>Audio, electronic, visual, thermal, olfactory, or similar information.</td>
<td>YES</td>
</tr>
<tr>
<td>I. Professional or employment-related information.</td>
<td>Current or past job history or performance evaluations.</td>
<td>YES</td>
</tr>
<tr>
<td>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</td>
<td>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</td>
<td>YES</td>
</tr>
<tr>
<td>K. Inferences drawn from other Personal Information.</td>
<td>Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</td>
<td>YES</td>
</tr>
</tbody>
</table>
Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregate consumer information.
- Other information to the extent excluded from the CCPA's scope, like:
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act of 1994;
  - Health or medical information that constitutes clinical trial data or that is otherwise covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH), or the California Confidentiality of Medical Information Act (CMIA);
  - Personal Information we may collect from a natural person (including, without limitation, emergency contact information for that natural person and such other Personal Information we may need in order to administer benefits for such natural person) in the course of the natural person applying for a job with us or otherwise in connection that natural person acting as our employee, owner, director, officer, medical staff member, or contractor; and
  - Personal Information we may collect from a natural person who is acting as an employee, owner, director, officer, or contractor of another company with which company we are communicating or for which company we are otherwise evaluating or actually providing a product or service.

Use of Personal Information

With respect to each of the categories of Personal Information listed in the table above, we may use or disclose such Personal Information for any one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided;
- To enroll you in benefits such as health insurance, dental, 401(k), etc.;
- To provide you with email alerts, event registrations and other statements concerning our employees;
- As otherwise necessary or appropriate to protect the rights, property or safety of us, our customers, consumers, or others;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- For such purposes as may be necessary or appropriate in connection with audits and reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;
- To improve our website and apps and present their content to you; and/or
- As otherwise described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

Changes to Our Privacy Statement

We reserve the right to amend this privacy statement at our discretion and at any time. When we make changes to this privacy statement, we will notify you through a statement on our website homepage.

Accessibility Statement

If you use assistive technology and the format of this privacy statement interferes with your ability to access information, please contact us at web_accessibility.us@bbva.com. To enable us to respond in a manner most helpful to you, please indicate the preferred format in which to receive the material and
your contact information. Users who need accessibility assistance can also contact us by phone at 1-800-273-1057.

Contact Information

If you have any questions or comments about this statement or the ways in which we collect and use your Personal Information, please do not hesitate to contact us at: privacy.us@bbva.com.

A Spanish version of this document is available below as a courtesy to our clients who use Spanish as their primary language. Although BBVA USA has taken every precaution possible to translate the original document correctly, the Spanish translation is only a courtesy to our clients. Please take note that all official documents from BBVA USA will be in English only.

Website: www.bbvausa.com/policy/privacy-policy.html

Email: privacy.us@bbva.com

Postal Address: BBVA USA

Attn: Office of the Data Protection Officer

701 32nd Street South

AL BI-SC SNS

Birmingham, AL 35233

Effective Date: January 1, 2020