

Renasant CCPA Privacy Policy

This **Privacy Policy for California Residents** (Policy) is provided by Renasant Bank (also referred to herein as Company, we, or us). Renasant Bank includes any entity owned or controlled by Renasant Corporation, Renasant Bank, and a subsidiary of both or either. This Policy supplements the information contained in Renasant Bank's general privacy policy (<https://www.renasantbank.com/assets/files/F1E62KvU>) and applies solely to all visitors, users, and others who are residents of the State of California ("consumers" or "you"). We adopt this Policy to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

Where noted in this Policy, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("**B2B personal information**") from some of its requirements.

Consumers have the right to request that Renasant Bank disclose what personal information we collect, use, disclose, and sell (if applicable). Our uses of personal information and instructions for submitting a verifiable consumer request for such disclosures are detailed in this Policy further below.

Information We Collect

We, Renasant Bank, 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 consumer ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the California Consumer Privacy Act's (CCPA) 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 (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we collected the following categories of personal information from our consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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.	YES
B. Personal information categories listed in the California	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,	YES

Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	
C. Protected classification characteristics under California or federal law.	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).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	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.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Personal physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20	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.	YES

U.S.C. Section 1232g, 34 C.F.R. Part 99)).		
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete, documents or information you provide us as part of a transaction or inquiry, or products and services you obtain from us
- Indirectly from you. For example, from observing your actions on our Website.
- From third parties you authorize or service providers. For example from credit bureaus, employers (such as a verification of employment), or certain government agencies or services.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a quoted interest rate or product terms, or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to obtain a product or service, we will use that information to open, process, fulfill, originate, or evaluate the requested product or service. We may also save your information to facilitate the servicing, maintenance, or normal administration of the product or service, such as maintaining a deposit account or servicing a loan or line of credit.
- 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, transactions, deposits, withdrawals, draws, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and 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 help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.

- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

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

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except for performing the contract. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We share your personal information with the following categories of third parties:

- Service providers.
- Joint marketing companies (as disclosed in our general Renasant Bank privacy policy)

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category I: Professional or employment-related information.

Category J: Non-public education information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Joint marketing companies (as disclosed in our general Renasant Bank privacy policy)

Sales of Personal Information

In the preceding twelve (12) months, we have not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you, as permitted by the degree of verification we are able to perform:

- 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 share that personal information (if applicable).
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list disclosing:
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for business-to-business personal information until the exemption expires.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, respond to an inquiry or process a request from you, take actions reasonably anticipated (or actions needed or requested by you) within the context

of our ongoing business relationship with you, maintain or service any ongoing product or account of yours, or otherwise perform our contract or transaction with you.

2. Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for such activities.
3. Exercise another right provided for by law.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
5. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation, which may be statutory, regulatory, contractual, or may be a law enforcement or judicial obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We currently do not provide these deletion rights for business-to-business personal information.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Utilizing our online CCPA Requests form (<https://validation.renasant.com/CCPA/>)
- Calling us at 1-800-680-1601
- Emailing us at info@renasant.com
- Logging into your online banking account with us and using the messaging service located within the online banking account.
- Sending a letter to:

Attention: CCPA Privacy Request

P. O. Box 4140

Tupelo, MS 38803

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child, to the extent your minor child may have an account, service, or otherwise have personal information with us.

When or if you utilize an authorized agent to submit a request or the authorized agent submits a request, we will require the following to be provided to us:

- A legally valid and effective Power of Attorney naming the authorized agent as the attorney in fact or your agent, such as one meeting the requirements of California’s Probate Code, sections 4000 to 4465, or
- Proof that the agent has written and signed permission from you to make the request (such as a copy of the signed permission). We will also require you (the consumer) to verify your identity directly with us and will require you (the consumer) to verify directly with us that you gave the authorized agent permission to submit the request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request for access, data portability, or deletion must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
 - If you currently maintain a password-protected account with us (i.e., online banking), you may make a request through that account for specific pieces of information or categories of information to which that account relates. You may also make deletion requests in this manner, although please be aware information may be needed in order to administer the account and so its deletion may be exempt under the CCPA (to the extent you desire to maintain the account). You will be required to login into the account to view or access the response, and this will serve as re-authentication of your identity. For the avoidance of doubt, you are not required to create an account with us if you currently do not have one. Please review the methods below if you do not currently have an account with us.
 - If you request specific pieces of information or request deletion of information: you must provide us with the following three pieces of information, so that we may confirm or match them with our information: Last six digits of your social security number, monetary amount in or of your account, and branch of account opening.¹ You must also provide us with a signed declaration, stating, “I, the undersigned, am making a request for disclosure of specific pieces of personal information or deletion of information under the CCPA. By signing below I certify and declare I am the consumer to whom the information relates, am the requestor whose personal information is the subject of the request, and I make this certification and declaration under penalty of perjury.”
 - If you request categories of information: you must provide us with the following two pieces of information, so that we may confirm or match them with our information: last six digits of your social security number and the branch of account opening.²
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

¹ Alternate pieces of information may be acceptable under our existing account authentication procedures.

² Alternate pieces of information may be acceptable under our existing account authentication procedures.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For requests for deletion, if we are able to sufficiently verify your identity and respond, we will inform you of the manner in which we have deleted the information, meaning whether we have (a) permanently and completely erased the personal information on our existing systems with the exception of archived or back-up systems; (b) de-identified the personal information; or (c) aggregated the personal information.

For any request for deletion, we maintain a record of the request pursuant to California Civil Code section 1798.105(d)

For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In Rights.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing.

If you have an account with us (1) with the capability to receive responses, and (2) relevant to the request type, we will deliver our response to that account. Otherwise, we will deliver your response in the method through which you submitted your request.

Any disclosures we provide will cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. If the response is provided electronically we will provide your personal information, to the extent technically feasible, in a format that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, commonly the formats used are Microsoft Excel or Adobe PDF.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

We do not sell the personal information of consumers. Without limiting the generality of the foregoing, we also do not sell the personal information of consumer's we actually know are less than 16 years of age.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

The CCPA allows businesses to offer certain financial incentives with respect to exercising CCPA rights. However, we do not differentiate price, rates, or quality levels due to exercising any rights under the CCPA. As such, we have no financial incentive program pursuant to the CCPA.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to info@renasant.com or write us at: Attention: CCPA Request, P. O. Box 4140, Tupelo, MS 38803.

Changes to Our Privacy Policy

- We reserve the right to amend this privacy Policy at our discretion and at any time. When we make changes to this privacy Policy, we will post the updated Policy on the Website and update the Policy's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this Policy, the ways in which Renasant Bank collects and uses your information described here and in our general **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by:

- Calling us at 1-800-680-1601
- Emailing us at info@renasant.com
- Logging into your online banking account with us and using the messaging service located within the online banking account.
- Sending a letter to:
Attention: CCPA Privacy Request
P. O. Box 4140
Tupelo, MS 38803

Effective Date: January 11, 2021

Last Reviewed on: January 1, 2021