

For California Residents

CCPA Privacy Notice

Medici Bank International, LLC (“MBI”) is providing this CCPA-specific privacy notice to supplement to our Privacy Policy above. This notice applies to individuals residing in California from whom we collect Personal Information.

The chart below contains the categories of Personal Information as defined by the CCPA, that we have collected and/or disclosed for a business purpose. The examples below were taken from the CCPA and have been included only to aid you in understanding each category. The examples are not full depiction of the information collected. There may be examples of information that we never collect, disclose or sell.

Category	We Collect	We Disclose	We Sell
A. Identifiers	Yes	Yes	No
Examples: 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.			
B. Categories of Personal Information in Cal. Civ. Code 1798.80(e)	Yes	Yes	No
Examples: 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.			
C. Characteristics of Protected Classifications under California or Federal Law	No	N/A	N/A
Examples: Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.			
D. Commercial Information	Yes	No	No
Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.			
E. Biometric Information	No	N/A	N/A

Category	We Collect	We Disclose	We Sell
Examples: Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.			
F. Internet or Other Electronic Network Activity Information	No	N/A	N/A
Examples: Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application or advertisement.			
G. Geolocation Data	No	N/A	N/A
Example: Precise physical location.			
H. Sensory Information	No	N/A	N/A
Examples: Audio, electronic, visual, thermal, olfactory, or similar information.			
I. Professional or employment-related information	Yes	No	No
Examples: Job application or resume information, past and current job history, and job performance information.			
J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)	No	N/A	N/A
Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.			
K. Inferences Drawn from Personal Information	No	N/A	N/A
Examples: Consumer profiles reflecting a consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.			

Use of Personal Information

Medici Bank International collects, uses, and discloses Personal Information pursuant to our Privacy Policy above, this includes Personal Information in accordance with the specific CCPA business and commercial purposes below:

1. Auditing related to a current interaction with you and concurrent transactions, including, but not limited to auditing compliance with this specification and other standards.
2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
3. Debugging to identify and repair errors that impair existing intended functionality.
4. Short-term, transient use.
5. Contracting with service providers to perform services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
6. Undertaking internal research for technological development and demonstration.
7. Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
8. Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
9. For other purposes for which we provide specific notice at the time the information is collected.

Collection and Disclosure of Personal Information

The information that we collect will be from general sources including you, your use of our services, your devices, our affiliates, our vendors, and our service providers. If the information previously provided to you in our Privacy Policy changes it will be reflected on our website under the Privacy Policy section and can be accessed at any moment.

As explained in our Privacy Policy, we share your Personal Information with the following categories of CCPA third parties:

1. Vendors and service providers, for providing products and services provided to you.
2. Third parties integrated into our services.
3. Third parties as required by law and similar disclosures.

Your California Privacy Rights

If you are a California resident, you may exercise the following rights.

Right to Know and Access. You may submit a request for information regarding the: (1) categories of Personal Information collected or disclosed by us; (2) purposes for which categories of Personal Information are collected by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you during the past twelve months.

- **Right to Delete.** Subject to certain exceptions, you have the option to delete Personal Information about you that we have collected from you.
- **Verification.** Requests for access or deletion of Personal Information are subject to identity verification and pursuant to relevant CCPA requirements, limitations and regulations.
- **Right to Equal Service and Price.** You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

Submit Requests. To exercise your rights under the CCPA, you can also reach out to us at support@medici.bank.

Contact

If you have any questions regarding the MBI Privacy Policy, you may call our customer support number at 1-787-563-9290 Monday through Friday 9am to 5pm EST.

Please note: Our Privacy Policy is revised on an annual basis please see our website at www.medici.bank to see the most updated version of this policy.