

**California Consumer Privacy Notice**

This Privacy Notice describes the categories and uses of Personal Information M&T Bank and its Affiliates, including our Wilmington Trust Wealth Advisory Services business (“WAS”) (sometimes referred to as “M&T Bank Corporation”) collect from you and other consumers residing in the state of California. This Notice also describes the rights consumers may have under applicable law including the California Consumer Privacy Act (“CCPA”).

This Privacy Notice may be amended or updated from time to time to reflect changes in our Personal Information processing activities, or changes in applicable law. When a change is made, we will post the updated version of this Privacy Notice to the [M&T Bank website](#) or [Wilmington Trust website](#). All changes will become effective as of the Last Updated date above. We encourage you to regularly check the website to review any changes which we may make, and to review our [M&T Digital Privacy Notice](#) or the [Wilmington Trust Digital Privacy Notice](#) which cover our collection and use of information when you visit those websites.

To obtain a version of this notice in larger print please call 1-800-724-2440.

**Section 1: Categories of Personal Information Collected in the last 12 months**

Category	Examples	Purpose
Access Data	User name, passwords, Personal Identification Number (PIN), tokens, other authentication information including security question response(s).	We collect this information to help us identify and authenticate you, for fraud prevention and similar purposes.
Account Data	Account Number, Mortgage Numbers, Credit Card Number, Insurance Policy Number	We collect this Personal Information to help us service your account.
Biometric Data	Voice Print, Signature	We collect this information for authentication purposes prior to disclosing any information about your account.

Category	Examples	Purpose
Communications Data	The contextualized information, in digital or physical form, involved in an exchange between one or more parties. Call logs, Call recording, Text or Email Messages	We collect communications data as needed to service your account and do business with you.
Contact Details	The information required to contact an individual or an organization, e.g., Address, Phone numbers, E-Mail address	We collect contact details as needed to identify you, contact you and do business with you.
Demographic Data	Gender, ethnicity, nationality, place of birth, marital status, residency status, military/veteran status	We collect demographic information as needed to identify you, contact you and do business with you.
Financial Information	Information for our financial review to service your account or from payments processing pertaining to executed transactions. For example, transaction date, transaction amount, product account transactions. Also, information such as tax documentation, income information, paystubs	We collect financial information in order to provide you the financial products and services you request.
Geolocation	Physical locations or movements	We may collect geolocation data if you are located in California.
Government Issued Identification	Information used to identify and verify relevant individuals. Examples include Passport Number, State Issued Drivers' License Number or ID numbers, Social Security Number / Taxpayer Identification Number, Alien Registration Number	We collect this information to help us identify and authenticate you, for fraud prevention and similar purposes.

Category	Examples	Purpose
Health Data	Information collected surrounding an individual's health. Medical information, disability data, genetic information	We collect health data as needed to service your account and do business with you.
Legal / Court Data	Legal/court Case, docket numbers, property registration information	We collect legal / court data as needed to service your account and do business with you.
Name	Individual's First, Middle and Last Name	We collect this Personal Information as needed to identify you, contact you, and do business with you.
Online / Digital Data	IP address, Web browsing history, Unique Device Identifier, Cookie data, Apps Downloaded or Used, geographic tracking information	We collect online and digital data to personalize our interactions with you and to administer and optimize our sites.
Sensitive Personal Data	Date of birth, Gender identity, Race	We collect sensitive personal data during the onboarding process with the intention of developing a complete and accurate "Know Your Customer" (KYC) profile in line with regulatory requirements.

We obtain the categories of Personal Information listed above from:

- you or your authorized agents directly at account opening;
- documents that you provide to us;
- third parties that interact with us in connection with the services we perform (e.g., credit bureaus);
- during account maintenance from you or your authorized agent on forms as required by law.
- We may also obtain your Personal Information from advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, and social networks.

Failure to provide this information will prevent us from conducting business with you. This information may be combined with other personal data, including criminal convictions and offences, that we obtain from third party or publicly-accessible sources for the purposes of compliance with a legal obligation.

We do not collect the following pieces of information on our consumers: commercial information (purchasing of consumer histories or tendencies); geolocation (physical location or movements); sensory data; education information; or inferences drawn from other Personal Information (personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).

We retain your Personal Information for the life of your customer relationship with us. Once your customer relationship is terminated, we will continue to retain your Personal Information only for as long as it is needed for the purposes set forth in this Privacy Notice, and for no longer than the maximum time period allowable under applicable law and regulation.

## Section 2: Disclosure of Personal Information

In accordance with applicable law, we may disclose your Personal Information to:

**Affiliates**, which include our related companies by common ownership or control

**Governmental and Judicial Bodies**, which include national and local government agencies, regulatory bodies, law enforcement agencies and courts

**Third Parties**, which include service providers, auditors, attorneys, and other professional advisors. Third Parties are subject to contractual obligations to only process the Personal Information for specific business purposes and in accordance with our instructions, and to use measures to protect the confidentiality and security of your Personal Information.

Reasons we can share your Personal Information	Do M&T Bank Corporation and the Wilmington Trust entities share?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> – to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates’ everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes</b> - information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don’t share

**Note: M&T Bank Corporation does not sell your Personal Information, therefore any rights that may be afforded to you under CCPA related to the sale of your Personal Information do not apply.**

### Section 3: Your Legal Rights

Subject to applicable law, you may have the right to exercise the following:

- The right to request access to, or copies of, your Personal Information that we have collected, used, or disclosed for the previous 12 months.
- The right to request deletion of your Personal Information that we process

Household Requests - We currently do not collect household data. If multiple members of the household make a right to access or right to deletion request, we will respond as if the requests are individual requests.

To exercise rights under the CCPA, you must be a current resident of State of California. Only you, your authorized agent (a person or business entity registered with the California Secretary of State to conduct business in that state), or a person or entity to whom you have granted Power of Attorney 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 exercise your access or deletion rights, please submit a verifiable consumer request to us:**

For customers of M&T Bank, call toll-free 1-800-724-2440.

For customers of the Wilmington Trust entities, contact your relationship manager, or call toll-free 1-866-771-7777, or email [ConsumerRequest@wilmingtontrust.com](mailto:ConsumerRequest@wilmingtontrust.com).

Your request must include your:

- Name;
- Address;
- Last 4 digits of your social security number.;
- An email address, if you wish to receive a response via email
- The nature of your request (access to or deletion of your data).

We will acknowledge receipt of your request within ten days, and will provide a response to your request within 45 days.

#### **Authorized Agent**

You may appoint an Authorized Agent to submit a request on your behalf. In order to do so, you must provide the appropriate documentation to M&T Bank or Wilmington Trust (Power of Attorney or proof of filing with the Secretary of State). In order for your authorized agent to act on your behalf, they must supply the appropriate documentation and verify their identity at the time they place the request.

Please note there are instances in which M&T Bank or Wilmington Trust is required to maintain, or otherwise is not required to delete, your Personal Information. For example, M&T Bank or Wilmington Trust is not required to delete your information if it is being used:

- To complete a transaction or provide a good or service requested by you;
- To detect security incidents or protect against malicious, deceptive, fraudulent, or illegal activity;
- To enable solely internal uses based on your relationship with us, such as a Do Not Solicit request;
- To comply with a legal obligation, such as federal recordkeeping requirements; or

- Internally, in a lawful manner that is compatible with the context in which you provided the information.

### California Non-Discrimination

California prohibits businesses from discriminating against you for exercising any rights under the CCPA, including, but not limited to, by:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

### Consumer Rights Requests Metrics

M&T Bank and Wilmington Trust have received zero (0) access, opt out, or deletion requests and has denied zero (0) requests as of July 1, 2021.

## Section 4: Defined Terms

<b>Personal Information</b>	<p>Any information that can be used to identify an individual, directly or indirectly. Personal Information does not include:</p> <ul style="list-style-type: none"> <li>○ publicly available information from government records;</li> <li>○ deidentified or aggregated consumer information;</li> <li>○ other information excluded from the CCPA's scope, such as: <ul style="list-style-type: none"> <li>• health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data</li> <li>• 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</li> </ul> </li> </ul>
<b>Processing</b>	<p>Operations, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, deletion or destruction</p>
<b>California Resident</b>	<p>An individual who resides in the State of California and whose personal income is taxed by the State of California</p>
<b>Verifiable Consumer Request</b>	<p>A request made by a consumer, on behalf of the consumer's minor child, or by a natural person or a person registered with the California Secretary of State as a consumer's authorized agent.</p>