

# What does BOK Financial Private Wealth, Inc. do with your personal information?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social security number and income
- Account balances and payment history
- Credit history and credit scores

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons BOK Financial Private Wealth, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does BOK Financial Private Wealth, Inc. 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	No	We don't share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We don't share

## TO LIMIT OUR SHARING

Mail the form below

### Please note

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

## QUESTIONS?

Call BOK Financial Private Wealth, Inc. at 1-303-539-0100

MAIL-IN FORM

Mark any/all if you want to limit:

☐ Do not allow your affiliates to use my personal information to market to me.

Name		Mail to: BOK Financial Private Wealth, Inc. 1600 Broadway, 4th Floor Denver, CO 80202
Address		
City, State, Zip		
Account Number		

What we do

How does BOK Financial Private Wealth, Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does BOK Financial Private Wealth, Inc. collect my personal information?	<p><b>We collect your personal information, for example, when you</b></p> <ul style="list-style-type: none"><li>• open an account or deposit money</li><li>• pay your bills or apply for a loan</li><li>• use your credit or debit card</li></ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p><b>Federal law gives you the right to limit only</b></p> <ul style="list-style-type: none"><li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li><li>• affiliates from using your information to market to you</li><li>• sharing for non-affiliates to market to you</li></ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions

Affiliates	<p><b>Companies related by common ownership or control. They can be financial and nonfinancial companies.</b> Our affiliates include companies with a common ownership under BOK Financial Corporation.</p>
Non-affiliates	<p><b>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</b> BOK Financial Private Wealth, Inc. does not share with non-affiliates so they can market to you.</p>
Joint Marketing	<p><b>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</b> Our joint marketing partners include credit card companies and insurance companies.</p>

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS IS ON THE FOLLOWING PAGES.

# Privacy Notice for California Residents Only

March 1, 2024

This Privacy Notice for California Residents supplements the information contained in our foregoing PRIVACY NOTICE and explains how we collect, use and disclose personal information relating solely to residents of the State of California covered by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the "CCPA"). This Privacy Notice for California Residents may be found online on our website at: <https://www.bokfinancial.com/legal-and-privacy/privacy-policy>. This Privacy Notice for California Residents constitutes our notice at collection and our privacy policy pursuant to the CCPA. We may change or update this Privacy Notice for California Residents from time to time. When we do, we will post the revised Privacy Notice for California Residents on this page with a new "Effective Date."

## INFORMATION WE COLLECT

### 1. Categories of Personal Information

We collect "personal information" that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident, including certain categories of "sensitive personal information." The CCPA, however, does not apply to certain information, including information subject to the Gramm-Leach-Bliley Act ("GLBA"). Depending on the type of products and services you use, we may have collected, and/or disclosed the following categories of personal information within the last twelve (12) months:

Category	Examples of data we may collect
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
B. Personal information categories	Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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. 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, gender, or veteran or military status
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories, or tendencies
E. Biometric information	Information such as fingerprints, faceprints, and voiceprints, physical patterns such as keystrokes and sleep, health, or exercise data that contain identifying information
F. Internet or other electronic network activity information	Browsing history, search history, information on a California resident's interaction with a website, application, or advertisement
G. Geolocation data	Device location and Internet Protocol (IP) location
H. Sensory data	Audio, electronic, visual or similar information such as video and call recordings
I. Professional or employment-related information	Current or past job history or performance evaluations
J. Education information	Education information, including information directly related to a student, and maintained by an educational agency or institution or by a party acting for the agency or institution
K. Inferences drawn from personal information	Inferences drawn from any of the personal information listed above to create a profile about a California resident reflecting preferences, characteristics, psychological trends, predispositions, behavior, and attitudes, intelligence, abilities, and aptitudes
L. Sensitive personal information	<ul style="list-style-type: none"><li>Personal Information that reveals:<ul style="list-style-type: none"><li>A California resident's social security number, driver's license, state identification card, or passport number;</li><li>A California resident's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;</li><li>A California resident's precise geolocation;</li><li>A California resident's racial or ethnic origin, religious or philosophical beliefs, or union membership;</li><li>The contents of a California resident's mail, email, and text messages unless the business is the intended recipient of the communication</li></ul></li><li>The processing of biometric information for the purpose of uniquely identifying a California resident; and</li><li>Personal information collected and analyzed concerning a California resident's health</li></ul>

2. Categories of Sources for Information

We collect personal information from the following categories of sources:

- You and your authorized agents
- Our affiliates Public records or government agencies
- Consumer reporting agencies
- Consumer data resellers
- Other similar persons or entities such as financial institutions, clearing, fund transfer, settlement systems, etc.
- Customers
- Joint marketing partners
- Our service providers
- Website/Mobile app activity and social media networks

3. Use of Personal Information

We may collect, use or disclose for our business purposes personal information, including sensitive personal information, relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business or commercial purposes, which may include the following:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services (except for cross-context behavioral advertising, a type of targeted advertising), providing analytic services, facilitating event management and execution, managing our real estate portfolio, or providing similar services
- Fraud prevention
- Helping to ensure security and integrity to the extent the use of Personal Information is reasonably necessary and proportionate for these purposes
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance that service
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a current interaction with us, where the information is not disclosed to a third party and is not used to build a profile or otherwise alter your experience outside the current interaction with us
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
- Detect, investigate, report and prevent activities that may violate our policies or be illegal, respond to law enforcement requests and as required by applicable law (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions)
- To evaluate or conduct a merger, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets in which personal information held by us is among the assets transferred;
- As described to you when collecting your personal information

4. Disclosure for Business Purpose

In the preceding twelve (12) months, depending on the type of products and services you use, we may have disclosed the categories of personal information listed in number 1 above for a business purpose to the following categories of persons or entities:

- Our affiliates
- Service providers and contractors who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing, marketing research activities, credit financing, event management, and real estate management
- Service providers and contractors who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, real estate expertise, appraisal expertise, notaries and auditors, who promote the bank and its financial services and products to customers and other prospective buyers
- Service providers and contractors who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, vehicle loan processes and aggregators (at the direction of the customer);
- Joint marketing partners
- Other persons or entities to whom we transfer personal information as an asset that is part of a merger, acquisition or other transaction in which such other person or entity assumes control of all or part of the business
- Government agencies as required by laws and regulations
- Other persons or entities to whom you or your agents may direct us to intentionally interact or to which you may or direct us to intentionally disclose your personal information

For purposes of this Privacy Notice for California Residents, “sold” means the disclosure of personal information or sensitive personal information to a third party for monetary or other valuable consideration, and “shared” means the disclosure of personal information or sensitive personal information to a third party for cross-context behavioral advertising.

In the twelve (12) months preceding the date of this Privacy Notice for California Residents, we have not sold any personal information or sensitive personal information that is subject to the CCPA. We have not sold or shared personal information or sensitive personal information of minors under the age of 16, to our knowledge, in the preceding twelve (12) months.

In the 12 months preceding the date of this Privacy Notice for California Residents, we shared personal information for cross-context behavioral advertising, with respect to California residents covered by the CCPA. As of the date of this Privacy Notice for California Residents, we have ceased such practices and no longer share personal information. Our prior sharing activities were performed to deliver advertising and marketing, including on non-affiliated third-party sites and mobile apps, using personal information we collected or that you provided to assist our non-affiliated third-party sites and mobile apps to select bank ads or offers that appealed to you, to display them to you and to monitor your responses. In connection with such advertising and marketing activities, we previously shared personal information with our third-party advertising and marketing vendors who were prohibited from using that personal information for any purpose other than to provide the specifically requested advertising and marketing services.



Though we have ceased “sharing” personal information of California residents covered by the CCPA, the categories of personal information that we did previously share for cross-context behavioral advertising in the 12 months preceding the date of this Privacy Notice for California Residents are:

- Identifiers such as a real name, alias, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers
- Internet or other electronic network activity information, such as browsing history, search history, and information regarding a California resident’s interaction with an internet website application or advertisement
- Geolocation data
- Inferences drawn from any of the personal information listed above to create a profile about a California resident reflecting their preferences, characteristics, psychological trends, predispositions, behavior, and attitudes, intelligence, abilities, and aptitudes.

**5. How Long We Retain Personal Information**

The length of time that we intend to retain each category of personal information will depend on a number of criteria, including (i) the length of time we are required to retain personal information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain personal information in order to accomplish the business or commercial purpose(s) for which such personal information is collected, used or disclosed (as indicated in this Notice), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your personal information.

**6. How We Use Sensitive Personal Information**

We only use or disclose sensitive personal information for the following purposes consistent with CCPA Regulations provided that the use or disclosure is reasonably necessary and proportionate for those purposes:

- To perform the services or provide the goods reasonably expected by an average California resident who requests those goods or services. For example, a California resident’s precise geolocation may be used by a mobile application that is providing them with directions on how to get to a specific location
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions. For example, we may use information about a California resident’s ethnicity and/or the contents of email and text messages to investigate claims of racial discrimination or hate speech
- To ensure the physical safety of natural persons. For example, we may disclose a California resident’s geolocation information to law enforcement to investigate an alleged kidnapping
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a California resident’s current interaction with us
- To perform services such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying a California resident’s information, processing payments, providing financing, providing analytic services, providing storage
- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a California resident

**7. Your Right to Make Requests**

If you are a California resident covered by the CCPA, you have the right to:

- A. Receive this Privacy Notice for California Residents at or before the point of collection of your personal information**
- B. Request we disclose to you free of charge the following information covering the 12 months preceding your request**
  - The specific pieces of personal information we collected about you
  - The categories of personal information we collected about you
  - The categories of sources from which the personal information was collected
  - The categories of personal information that we disclosed for a business purpose
  - The categories of third parties to whom personal information was disclosed, including for a business purpose, and the categories of personal information that were disclosed
  - Our business or commercial purpose for collecting your personal information
- C. Request to delete personal information collected by us**
  - You have the right to request that we delete your personal information that we collected from you, subject to certain exceptions.
- D. Request to correct inaccurate personal information that we maintain about you**
- E. Be free from unlawful discrimination for exercising any of your CCPA rights**

8. How to Exercise your CCPA Rights

Methods: If you are a California resident, you may exercise the rights described above by submitting a request to us by one of the following methods:  
Call us at: 844-961-1057  
Visit us at: [www.bokfinancial.com/privacyrequest](http://www.bokfinancial.com/privacyrequest)

Information to include in the request:

- Provide sufficient information that allows us to verify you are the person about whom we collected personal information
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. For instance, state whether your request is to disclose information we have about you or delete information and identify the category or type of information that is the subject of your request.

Who can make the request:

You, an agent authorized to act on your behalf, or a guardian may make a verifiable consumer request related to your personal information. We may require proof of authorization and verification of identity directly from the person for whom the request is made. You may also make a verifiable consumer request on behalf of your minor child.

How often you can make a request:

You may make a verifiable consumer request to know or delete personal information twice within a 12-month period.

9. Our Process for Responding to Your Request

First, the CCPA requires us to determine that the request to know, correct or delete personal information is made by the consumer whose information is the subject of the request. This is referred to as a verifiable consumer request. We will acknowledge receipt of your request and let you know you how long it will take to respond if we are able to verify your identity. We may need to ask you to provide additional information either to confirm your identity or to accurately respond to your request.

Once we have the information to verify and respond to your request, we will review it and determine what specific information about you should be returned to you in response to a request to know and what information must be deleted by us and our service providers in response to a request to delete.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the preceding 12-month period. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

10. Contact Information

If you have any questions or comments about our privacy policies and practices, please contact us at: 844-961-1057