

FACTS

WHAT DOES ALTA VIA CAPITAL DO WITH YOUR PERSONAL INFORMATION?

Why?	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.
What?	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
How?	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 we choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	No	NA
For joint marketing with other financial companies	No	NA
For our affiliates' everyday business purposes— information about your transactions and experiences	No	NA
For our affiliates' everyday business purposes— information about your creditworthiness	No	NA
For our affiliates to market to you	No	NA
For non-affiliates to market to you	No	NA

Questions?	Call 925-694-0090
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Who we are	
Who is providing this notice?	Alta Via Capital
What we do	
How do we protect your 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 do we collect your personal information?	We collect your personal information, for example, when you • Open an account or deposit money

Why can't you limit all sharing?	Federal law gives you the right to limit only • Sharing for affiliates' everyday business purposes—information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when you limit sharing for an account you hold jointly?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Your Rights:

- Right to Access Information/Correct Inaccurate Information
 - You have the right to request access to information collected about you and information regarding the purposes for which we collect it and the third parties and service providers with which we share it. Additionally, you have the right to correct inaccurate or incomplete information. You may submit such a request as described below.
- Right to Deletion of Information
 - You have the right to request in certain circumstances that we delete any information that we have collected directly from you. You may submit such a request as described below. We may have a reason under the law why we do not have to comply with your request or why we may comply in a more limited way than you anticipated. If we do, we will explain that to you in our response.
- Right to Opt Out of Sale of Information to Third Parties
 - You have the right to opt out of any sale of your information by us to third parties by submitting a request. **We do not, however, sell information to third parties for their own direct marketing purposes.**
- Right to Opt Out of Targeted Advertising
 - You have the right to opt out of [targeted advertising](#) based on your information obtained from your activities over time and across websites or applications. **We do not, however, utilize targeted advertising.**
- Right to Opt Out of Profiling
 - You have the right to opt out of having your information processed for the purpose of profiling in the furtherance of decisions that produce legal or similarly significant effects concerning you. **We do not, however, utilize profiling for these reasons.**
- Right to Appeal
 - If we decline to take action in any request that you submit in connection with the rights described in the above sections, you may ask that we reconsider our response by sending an email to the same email box (referenced in section below) from which you receive the decision. You must ask us to reconsider our decision within 45 days after we send you our decision.