

Privacy Notice

for Individuals Located in the European Union (EU)

Last Updated: April 2026

1. Scope and Who We Are

Mission Valley Bank ("MVB", "we", "us", or "the Bank") is a U.S. financial institution headquartered in California. We do not actively market or offer banking services to individuals located in the European Union (EU). However, we may process limited personal data of individuals located in the EU in specific situations, including grandfathered customer relationships that originated before the Bank ceased offering services to non-resident aliens (NRAs) and EU-resident natural persons associated with U.S. business customers (e.g., beneficial owners, authorized signers, guarantors, trustees, or power-of-attorney holders). Where the EU General Data Protection Regulation (GDPR) applies to this processing, the Bank acts as a data controller for the personal data concerned. We are not established in the EU and do not offer services to, or monitor the behavior of, individuals in the EU; accordingly, we do not appoint an EU Representative under Article 27. We reassess this position periodically.

Controller Contact: Mission Valley Bank

Compliance Department

Email: compliance@mvb.com

Phone: (818) 394-2300

Address: 2777 N. Ontario Street, Suite 130, Burbank, CA 91504.

2. Personal Data We Process

Depending on the interaction, we may process identity and contact information, authentication/KYC information, customer access/use data, financial and transactional information, and due diligence outputs (AML/CFT, sanctions, adverse media).

3. Purposes and Legal Bases

- Contractual necessity (Art. 6(1)(b)) — to open/maintain accounts, perform transactions, and service U.S. business customers.
- Legal obligation (Art. 6(1)(c)) — to comply with U.S. banking laws including AML/CFT, sanctions, fraud reporting, and tax requirements.
- Legitimate interests (Art. 6(1)(f)) — for fraud prevention, information security, risk management, and legal claims, balanced against your rights.
- Consent (Art. 6(1)(a)) — used sparingly where legally required.

We do not engage in automated decision-making producing legal or similarly significant effects (GDPR Art. 22).



4. Disclosures to Third Parties

We disclose data on a need-to-know basis to U.S. regulators and authorities, payment processors, correspondent banks, service providers under confidentiality controls, and in connection with mergers or reorganizations.

5. International Transfers

Mission Valley Bank stores and processes all personal data in the United States. When GDPR applies and an individual located in the EU voluntarily provides personal data to the Bank, that information is transferred to a country without an EU adequacy decision. The Bank does not maintain operations, offices, vendors, or processing arrangements in the EU and does not have contracts with EU-based processors or service providers. Therefore, Standard Contractual Clauses (SCCs) are not used. Transfers may occur under GDPR Article 49(1)(b) when necessary for the performance of a contract with the individual or to take steps at their request. Other Article 49 derogations may apply only where appropriate and proportionate. All transfers are occasional, customer-initiated, and incidental to U.S. banking services.

6. Security

We implement administrative, technical, and physical safeguards to protect data, restrict access, encrypt transmissions where appropriate, log activity, and maintain incident response protocols.

7. Retention

We retain data according to legal and regulatory requirements. U.S. banking laws including BSA/AML, OFAC, tax, and GLBA impose mandatory retention periods. Data is securely deleted or de-identified once retention obligations end.

8. Your GDPR Rights

Where GDPR applies, you may have rights to access, rectify, erase, restrict processing, object, or request portability. These rights may be limited where U.S. federal or state laws require the Bank to retain or continue processing specific records. This includes mandatory retention under: BSA, AML/CFT, OFAC, IRS regulations, ****Gramm-Leach-Bliley Act (GLBA)**** requirements for maintaining customer information for business and regulatory purposes, and other U.S. fraud-prevention or regulatory laws. Therefore, the Bank may be unable to delete or restrict certain information even if GDPR would otherwise allow it. To exercise rights, contact compliance@mvp.com.

9. Marketing

Mission Valley Bank does not market banking products or services to individuals in the EU. The Bank may occasionally send informational, educational, or fraud-prevention communications. These are considered service or security notices, not marketing. If such messages include an unsubscribe option, the Bank will honor opt-out requests; however, essential service or security notices may still be provided as required under U.S. law.

10. Children

Our services are not directed to children under 16, and we do not knowingly collect their personal data.

11. Changes to This Notice

We may update this Notice to reflect changes in law or operations. The effective date appears at the top.