FirstSun California Consumer Privacy Act Notice

Legal Entities

This California Consumer Privacy Act Notice ("Notice") applies to FirstSun Capital Bancorp legal entities that utilize the brand names Sunflower Bank, N.A. and First National 1870, as well as the following entities: FEIF Capital Partners, LLC, FEIF GP, LLC, SPHC, LLC, Sunflower Insurance Solutions, Inc., Sunflower Holdings, Inc. Sunflower Public Finance, LLC, and Sunflower Wealth Advisors, LLC. ("Company", "we", "us" or "our").

Applicability

Your privacy is important to us. This California Consumer Privacy Act Notice (download a printable copy of this Notice; PDF, requires Adobe Reader) explains how we collect, use and disclose personal information relating to California residents covered by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the "CCPA"). This "Notice" constitutes our notice at collection and our privacy policy pursuant to the CCPA.

Introduction

Under the CCPA, "Personal Information" is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident and includes certain categories of Personal Information discussed below that constitute "Sensitive Personal Information." The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act ("GLBA"). The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Notice does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our Consumer Privacy Notice. Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to

protect personal data against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access, whether it is processed by us or by others on our behalf.

If you are not a resident of California, you may submit a request and we may process it, as described in this Notice, even though the CCPA does not require us to do so. In accepting, processing, and responding to requests by individuals who are not California residents, we will apply all the same limitations and exceptions under the CCPA to those requests as apply to requests made by California residents. We reserve the right to change or stop the practice of accepting requests from U.S. individuals who are not California residents.

Categories of Personal Data that We Collect

We collect Personal Data in a variety of contexts. For example, we collect Personal Data to provide financial products and services, for our human resource, and vendor management purposes.

The Personal Data that we collect about a specific California resident will depend on, for example, our relationship or interaction with that individual.

During the past 12 months, we have collected the following categories of Personal Data.

1. **Personal Identifiers** — Personal unique identifiers, such as full name and federal or state issued identification numbers including Social Security number, driver's license number, and passport number;
2. **Personal Information** — Personal information, including contact details (e.g., telephone number and address), financial information (e.g., account number and balance), payment card details (e.g., credit and debit card numbers), and medical and health insurance information;
3. **Characteristics of Protected Classes** — Characteristics of protected classes or groups under state or federal law, such as sex, disability, citizenship, primary language, immigration status and marital status;
4. **Purchase Information** — Purchase information, such as products and services obtained and transaction histories;
5. **Biometric Information** — Biometric information, such as fingerprints and voiceprint;

6. **Internet or Online Information** — Internet or online information (e.g., browsing history) and information regarding interaction with our websites, applications, or advertisements;
7. **Geolocation Data** — Geolocation data, such as device location;
8. **Audio and Visual Information** — Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recording;
9. **Employment Information** — Professional or employment-related information, such as work history and prior employer, information from background checks, resumes, and personnel files;
10. **Education Information** — Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and confirmation of graduation;
11. **Inferences** — Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics; and
12. **Sensitive Personal Information** —
    - Social Security number, driver's license, state identification card, government issued identification, or passport number;
    - 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;
    - Precise geolocation;
    - Racial or ethnic origin, religious or philosophical beliefs, citizenship, or immigration status;
    - The contents of mail, email, and text messages unless we are the intended recipient of the communication;
    - Biometric information processed to uniquely identify an individual; and
    - Personal information collected and analyzed concerning an individual's health.

In addition to collecting Personal Information ourselves, we additionally coordinate with third parties to collect Personal Information on our behalf, which third parties are engaged in one or more of the business practices described below:

- Delivering advertising and marketing, including on non-affiliated persons' or entities' sites and mobile apps;
- Facilitating events and event management, including virtual and/or in-person events (e.g., hotels, restaurants, virtual platforms, audio/visual capabilities, food/beverage, transportation services, etc.); and

- Referral sources, whether for purposes of identifying candidates for employment, identifying new client opportunities, or recommending vendors or contractors.

Sources of Personal Data

The sources from which we collect Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Data in different contexts.

- From California residents directly, or other individuals acting on their behalf, through, for example, physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website, social media) sources.
- Information from Client Directed persons or entities or Institutions representing a Client/Prospect.
- Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member).
- Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, and local government entities.
- Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing. Examples may include internet service providers, social networks, operating systems and platforms, data brokers, advertising networks, and data analytics providers.
- Information from our Affiliates.
- Outside companies or organizations from whom we collect Personal Data to support human resource and workforce management activities. Examples may include operating systems and platforms, and social networks.
- Outside companies or organizations from whom we collect Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.

Why We Collect Personal Data and How We Use and Disclose It

The purposes for which we collect, use, and disclose Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The table below lists the purposes for which we collect, use, and disclose Personal Data in different contexts.

Purposes for Collection, Use and Disclosure	Examples
Provide and manage products and services	▪ Establish and process transactions for our products and services including checking accounts, credit cards, loans, investment accounts, as well as additional products for businesses such as commercial financing and payment services ▪ Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications ▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners, and financial institutions
Support our everyday operations, including to meet risk, legal, and compliance requirements	▪ Perform accounting, monitoring, and reporting ▪ Enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence ▪ Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims ▪ Enable the use of service providers for business purposes ▪ Comply with laws, regulations, policies, procedures, and contractual obligations ▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners, and financial institutions

Purposes for Collection, Use and Disclosure	Examples
Manage, improve, and develop our business	▪ Market, personalize, develop, and improve our products and services ▪ Conduct research and analysis, including to drive product and services innovation ▪ Support customer relationship management ▪ Evaluate and engage in mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets ▪ Obtain support for fulfilling the above purposes from our service providers and from our professional services, business, and marketing partners
Support employment, infrastructure, and human resource management	▪ Provide benefits to employees and dependents, including healthcare and retirement plans ▪ Manage pay and compensation activities ▪ Manage and operate our facilities and infrastructure ▪ Process employment applications ▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners

Purposes for Collection, Use and Disclosure	Examples
Sensitive Personal Information as permitted by law	▪ Perform services for our business, provide goods or services as requested by individuals, and ensure security and integrity ▪ Short term transient use such as displaying first party, non-personalized advertising ▪ Process and fulfil orders, maintain and service accounts, provide customer service, verify customer information, process payments, and provide financing ▪ Activities relating to quality and safety control or product improvement

Categories of Third Parties and Our Disclosure of Personal Data

The categories of third parties to whom we disclose Personal Data about a specific individual depend on, among other things, our relationship or interaction with a specific California resident. Such third parties include:

Recipients	Examples
Affiliates	Companies related by common ownership or control
Service Providers	May include internet service providers, social networks, operating systems and platforms, data brokers, advertising networks, and data analytics providers; companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.

Advertising Partners	Advertising and marketing companies
Other persons or entities with which you may use or direct us to intentionally interact or to which you may use or direct us to intentionally disclose your Personal Information.	Accountants, appraisers, other service providers or persons you authorize us to interact with.
Government entities	Regulatory and law enforcement agencies or others who are legally entitled to information pursuant to a court order, warrant or subpoena
Outside companies	Data analytics providers, routine required reporting including consumer reporting agencies, and other parties

- We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

The table below shows, for each Personal Data category we have collected, the categories of third parties to whom we disclosed for our business purposes information from that Personal Data category during the preceding 12 months. The table below contains briefer descriptions of the categories of Personal Data and third parties. The full descriptions of the categories of Personal Data and third parties are available above.

Personal Data Type	**Third Party Category to Whom We Disclosed Personal Data for Business Purposes**
Personal Identifiers	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development

Personal Data Type	Third Party Category to Whom We Disclosed Personal Data for Business Purposes
	▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Personal Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Characteristics of Protected Classes	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management

Personal Data Type	Third Party Category to Whom We Disclosed Personal Data for Business Purposes
	▪ Outside companies in connection with routine or required reporting
Purchase Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Biometric Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Outside organizations in connection with human resource activities and workforce management
Internet or Online Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management

Personal Data Type	Third Party Category to Whom We Disclosed Personal Data for Business Purposes
	▪ Outside companies in connection with routine or required reporting
Geolocation Data	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Audio and Visual Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management
Employment Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents

Personal Data Type	Third Party Category to Whom We Disclosed Personal Data for Business Purposes
	▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Education Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Inferences	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting

Personal Data Type	Third Party Category to Whom We Disclosed Personal Data for Business Purposes
Sensitive Personal Information	▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting

Data Retention

The length of time that we intend to retain each category of Personal Information will depend on several 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.

Sale of Personal Information

The CCPA defines a "sale" as the disclosure of Personal Data for monetary or other valuable consideration. FirstSun does not sell and has not, within at least the last 12 months, sold Personal Data, including Sensitive Personal Data that is subject to the CCPA's sale limitation. As of January 16, 2026, we do not share Personal Data for cross-context behavioral advertising within the scope of CCPA. We have no actual knowledge that we sell or share Personal Data of California residents 16 years of age and younger.

Requests Under the CCPA

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

(1) Receive this Notice at or before the point of collection of your Personal Information.

(2) Request we disclose to you free of charge the following information covering the 12 months preceding your request. Depending on the nature of your request and our retention practices, you may also request disclosure of Personal Information collected beyond the 12-month period (for Personal Information collected on or after January 1, 2022), subject to limitations permitted by law:

a. the categories of Personal Information about you that we collected;

b. the categories of sources from which the Personal Information was collected;

c. the purpose for collecting Personal Information about you;

d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that were disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and

e. the specific pieces of Personal Information we collected about you.

(3) Request we correct inaccurate Personal Information that we maintain about you.

(4) Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception.

(5) Request that we limit our use and disclosure of Sensitive Personal Information to purposes permitted by the CCPA (also known as the "right to limit").

(6) Opt out of the sale or sharing of your Personal Information (as those terms are defined under the CCPA).

(7)) Be free from unlawful discrimination for exercising your rights under the CCPA.

Requests for specific pieces of Personal Information will require additional information to verify your identity, or the proof of authorization and verification of identity directly from the person for whom the request is made.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another California resident or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights. We will advise you in our response if we are not able to honor your request.

We will not provide Social Security numbers, driver's license numbers or government-issued identification numbers, financial account numbers, unique biometric data, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

How to Make Requests

If you are a California resident, you can submit a Request to Know, Delete, or Correct, a request to limit the use of Sensitive Personal Information, or an opt-out request regarding the sale or sharing of Personal Information by:

- Contacting us at **1-877-827-5564**; or
- Submitting your request here

For all other individuals, we will ask you to provide the following information to identify yourself:

- Name, contact information, social security or individual taxpayer identification number, date of birth; and
- A copy of government issued photo ID. We accept your Driver's license, State ID, or Matricula Card.

If you are an authorized agent (individual, company, or organization) additional verification documentation may be requested.

When you make a Request to Know, Delete, or Correct, we will attempt to verify that you are who you say you are. For example, we will attempt to match information that you provide in making your Request with other sources of similar information to reasonably verify identity.

Responding to Requests

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we collect, use, and disclose. When these other laws apply, Personal Data may be exempt from, or outside the scope of, a request to Know, Delete, or Correct. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability, is exempt from CCPA Requests. As a result, we may decline all, or part of your Request related to exempt Personal Data. This means that we may not provide some, or all, of this Personal Data when you make a Request to Know. Also, we may not delete or correct some, or all, of this Personal Data when you make a Request to Delete or Correct.

As examples, our processing of or response to a Request to Know, Delete, or Correct may not include some or all the following Personal Data:

- **Consumer Accounts.** Personal Data connected with consumer accounts used for personal, family, or household purposes. We have other privacy notices providing certain information on use and sharing of this data, for example, the Company's U.S. Consumer Privacy Notice, available at Consumer Privacy Notice.

The types of Personal Data described above are examples. We have not listed all types of Personal Data that may not be included when we respond to or process Requests to Know, Delete, or Correct.

In addition to the above examples, we may not include Personal Data when we respond to or process Requests to Know, Delete, or Correct when the CCPA recognizes another exception. For example, we will not provide the Personal Data about another individual when doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Data when it is necessary to maintain that Personal Data to comply with a legal obligation.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request.

Changes to this Notice

We may change or update this Notice periodically. When we do, we will post the revised Notice on this webpage indicating when the Notice was "Last Updated."

Contact Us

Questions or concerns You may contact us with questions or concerns about this Notice and our practices by:

(1) Writing us at: CCPA, 3025 Cortland Cr, Salina, Kansas 67401

(2) Emailing us at customerservice@sunflowerbank.com

Effective: January 16, 2026

Last Updated: January 16, 2026