

<u>COOPERATIVE BUSINESS SERVICES, LLC</u> <u>PRIVACY POLICY FOR LENDERS</u>

Effective as of June, 2021

General Terms

As a lender that has engaged the services of Cooperative Business Services, LLC ("CBS"), "You" may from time to time provide CBS confidential and proprietary information about entities and individuals for whom you are, will, or maybe providing financial services and/or accommodations. Such information may include, personal, business, geographic, identifying and demographic information such as names, addresses, phone numbers, email addresses, identification numbers, corporate documents, other personally identifiable information, financial information, business information, tax returns, bank, credit card, obligation and loan numbers, and information derived from credit reports (collectively, "Third-Party Information").

With respect to Third-Party Information, CBS has developed and implemented, and maintains, administrative, technical and physical safeguards. The objective of CBS' safeguards is to ensure the security and confidentiality of Third-Party Information; protect against anticipated threats or hazards to the security or integrity of such information; protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to the person that is the subject of the Third-Party Information; and to ensure the proper disposal of the information. Additionally, where applicable, any safeguard developed, implemented and maintained by CBS will be in consideration of the guidance set forth in Title 12, Part 364, Appendix B of the Code of Federal Regulations. To the extent the Third-Party Information You disclose is subject to a non-disclosure agreement entered into between You and CBS, CBS hereby reaffirms to protect, and not disclose, the information consistent with the terms and conditions of that agreement. Notwithstanding the foregoing, by submitting Third-Party Information to CBS, You represent and warrant that You have obtained and submitted such information in accordance with, all applicable federal, state and administrative laws, statutes, rules and regulations.

In the event of any unauthorized use or disclosure, or loss of Third-Party Information, CBS will: (i) inform you as soon as practicable, or sooner if required by law or regulation; (ii) investigate any such unauthorized use, disclosure or loss, and will take commercially reasonable actions to mitigate the use, disclosure or loss; and (iii) cooperate with You in regards to any investigation, report, notification or action You are required to perform or provide pursuant to federal, state or administrative law, statute, rule or regulation.

Third-Party Information received by CBS is not sold to third parties, and is only disclosed to third parties when authorized by you, or when necessary to provide or administer services as it relates to loan transactions, including but not limited to service providers under contract with

CBS, who help with parts of CBS's business, when required by an audit by a third party (including government authorities), when required by regulatory authorities, or when required by legal process (including, but not limited to law, regulation, court order, subpoena, search warrant, or in the course of a legal proceeding).

CBS works with third party vendors who utilize the Federal Financial Institutions Examination Council's cybersecurity assessment tools to identify any cyber risk posed to CBS, and to mitigate any risk(s) found. Said third party vendors sign a representation and warranty agreement that all work completed on CBS's behalf complies with all applicable data security laws, included those referenced in this Policy.

How To Contact CBS

If you have questions about this Policy, please contact us at:

Cooperative Business Services, LLC Attn: Loan Servicing 8150 Corporate Park Drive, Suite 300 Cincinnati, OH 45242 Phone: 888.697.9555 Fax: 513.677.6789

This Policy is always available to view online at: www.cbscuso.com