



**COOPERATIVE BUSINESS SERVICES, LLC**  
**PRIVACY POLICY FOR LENDERS**

**Effective as of June 1, 2019**

**General Terms**

Cooperative Business Services, LLC (“CBS”) is committed to the highest standards in safeguarding and using your confidential business information. Throughout this Privacy Policy (the “Policy”), we use the term “Information” to describe financial information that can be used to identify a specific business entity, specific person, or, otherwise, internal operations. The word “you” refers to the lender, whether a limited liability company, trust, partnership, corporation, or any other existing lending entity. This Policy is an expectation you can have in all of your dealings with CBS. There may also be additional privacy information / assurance specific to a product / service CBS provides. When that is the case, that additional information will be called to your attention in the product / service information. We may amend this policy at any time by sending a revised version via regular mail to the billing address CBS has on file, via electronic transmission, or via facsimile to you. The revised version will be effective upon delivery of the revised version to you.

CBS collects certain personal identifiable information, which includes but is not limited to business, geographic and demographic information, names, address, phone numbers, email addresses, tax identification numbers, employee identification numbers, trust agreements, corporate documents, bank account numbers, loan numbers, obligation numbers, passwords for secured documents, driver’s license numbers, and other financial information (collectively, the “PII”). PII collected by CBS is used to provide business services, including, but not limited to underwriting opinions, commercial loan closings, special asset workouts, obtaining credit reports, ordering flood certificates, and any additional function required thereof.

PII collected by CBS is maintained via physical, electronic, and procedural safeguards to protect nonpublic information. Because there are inherent risks to confidentiality associated with electronically stored PII, CBS has made substantial investments in technology to protect all collected PII, including the use of firewalls and data encryption. CBS also enforces physical, electronic and procedural safeguards to CBS offices and files, and allow only authorized access to PII to those employees who require it to fulfill their job requirements.

PII collected 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), 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 will not sell

or rent any of your PII to third parties for marketing purposes and only shares information with third parties as described in this Policy. CBS complies with federal and state regulations as well as industry standards set forth to protect your PII. PII will be stored in CBS's record system which is designed to retrieve information about your account by utilizing various PII.

Finally, 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.

### **Error Resolution Notice**

The purpose of this notice is to provide you with important information about reporting errors in CBS's capacity of processing and reporting information. You should keep this notice for future reference. You should notify CBS as soon as you can if you believe:

1. Information provided to you by CBS is wrong; or
2. You need more information about a report, transaction or other data provided to you by CBS

You must notify us no later than sixty (60) days after the error first appears in any documentation provided to you by CBS. We may extend the sixty (60) time period if a good reason prevented you from notifying CBS within sixty (60) days.

For any type of error, you must notify CBS, in writing, to:

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

When you notify CBS in writing, provide CBS with the following information:

1. Your name, address, telephone number, and email address;
2. Applicable loan number(s); and
3. A detailed description of the suspected error and an explanation as to why you believe it is incorrect

During the course of our investigation, CBS may request additional information from you. Once you notify CBS of a suspected error, CBS will investigate your complaint or question and will inform you of its decision in writing after completing its investigation.

If CBS determines that there was an error, CBS will promptly correct the error. If CBS decides that there was not an error, it will include an explanation of its decision in writing to you.

## Security Breach

In the event of the unintended dissemination of PII, a loss of control of PII, an unauthorized access of PII in electronic format, or other such breach that could cause identity theft and/or fraud (collectively, a “Security Breach”), CBS will take the following actions:

1. Within ten (10) days of the discovering a Security Breach, CBS will contact the Attorney General or applicable State Agency where you reside.
2. Within twenty-five (25) days after a discovery by CBS of a Security Breach, CBS will notify you at the address on file, where the monthly statement is delivered. CBS may also reach out to you via encrypted email for a more timely notification, with a mailed notification to follow.
3. For those states where further action is required following the discovery by CBS of a Security Breach, all necessary measures will be taken to abide by that state’s laws.

## Email Communications

CBS will correspond with you via email prior, during, and after a loan has been consummated. If you send CBS an email, the contents of your email may not be secured based on the security protocols of your email service; accordingly, CBS recommends that you do not email any PII to any party at CBS, and instead, upload any documentation that may contain PII to CBS at <https://www.cbscuso.com/upload> (CBS utilizes the services of Box, which conforms to industry standards for all data handling). CBS is not responsible for the dissemination of PII when received via unencrypted email.

Additionally, should CBS need to email you any information or documentation that contains PII, CBS will utilize ZixMail to correspond with you. ZixMail is an email encryption tool that conforms to industry standards for data handling. The email you receive utilizing ZixMail will contain instructions on how to access the contents of the email. Email communications you send to CBS will be preserved and secured for varying periods of time utilizing CBS’s standard security protocols.

This Policy does not apply if we are providing services for another entity or person or in circumstances that deviate from our normal course of business. This Policy can be amended at any time.

CBS’s website many contain links to other business and organizations. These websites are not within CBS’s control, and may not follow the same privacy or security policies. If you click a link to another website, you are subject to the policies of that website.

## **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](http://www.cbscuso.com)