



PRIVACY POLICY FOR CALIFORNIA RESIDENTS

Cooperative Business Services, LLC (“CBS”) has adopted this Privacy Policy for California Residents (the “Policy”) to maintain compliance with the California Consumer Protection Act of 2018 (the “CCPA”). For this Policy, “California residents” is defined as a natural person who is a California resident, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017, however identified, including any unique identifier. Unless explicitly defined within this Policy, all terms in Policy have the same meaning as set forth in the CCPA.

CBS will collect personal information from you that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device. Below is a list of the personal information, by category, that we may collect from you in your business dealings with CBS:

1. Identifiers as defined in Cal. Civ. Code §1798.140(o)(1)(A)
2. Personal information categories as defined in Cal. Civ. Code §1798.80(e)
3. Characteristics of protected classifications under California or federal law (Cal. Civ. Code §1798.140(o)(1)(C))
4. Commercial information as defined in Cal. Civ. Code §1798.140(o)(1)(D)
5. Biometric information as defined in Cal. Civ. Code §1798.140(b)
6. Internet or other electronic network activity as defined in Cal. Civ. Code §1798.140(o)(1)(F)
7. Geolocation data
8. Sensory data including audio, electronic, visual, thermal, olfactory or similar information
9. Professional or employment related information
10. Non-public education information as defined in Cal. Civ. Code §1798.140(o)(1)(J)
11. Inferences drawn from any provided personal information as defined in Cal. Civ. Code §1798.140(o)(1)(K)

CBS does not sell your personal information, and has not sold your personal information in the last twelve (12) months; including any and all personal information in the above categories. CBS only collects personal information found within the above categories of 1, 2, 3, 4, 7, 9, 10, and 11. Under the CCPA, the sale of personal information includes selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration (Cal. Civ. Code §1798.140(t)(1)).

Per the CCPA, “personal information” does not include information publicly available; “publicly available” means information that is lawfully made available from federal, state, or local

government records, and does not include biometric information collected by a business about a consumer without the consumer's knowledge.

CBS' Use of Personal Information

CBS may use or disclose your personal information during the ordinary course of business with its employees, member credit unions, outside legal counsel and representatives, state and federal regulators, and employees of same. CBS may use or disclose your personal information for one or more of the following business purposes:

- Underwriting of commercial loans
- Closing of commercial loans
- Special asset workouts
- Obtaining credit reports during the underwriting or servicing of commercial loans
- Ordering flood certificates for real property
- Additional functions required thereof
- Sale and participation of commercial loans with credit unions
- Complete any transaction for which personal information was collected or fulfill terms of a contract
- Comply with legal obligations

CBS will not use or disclose your personal information outside of the above reasons without first providing you notice.

Right to Access Specific Information

Under the CCPA, you have the right to request that we disclose to you the information CBS has collected over the preceding twelve (12) months (Ca. Civ. Code §1798.110). Upon CBS' receipt of your request to disclose, CBS will provide to you:

- a. The applicable categories of personal information CBS has collected.
- b. The applicable categories of sources that personal information CBS has collected.
- c. The business purpose use of the collected personal information.
- d. The applicable categories of third parties with whom CBS has shared your personal information.
- e. The specific pieces of personal information CBS has collected about you (referred to as a data portability request under the CCPA).
- f. The business purpose use of the collected personal information that has been disclosed to a third party, and the category of the third party which used the personal information.

Please see 'How to Request' in this Policy on how to request access to your specific information.

Right to Delete Personal Information

Under the CCPA, you have the right to request that CBS delete any personal information collected in the last twelve (12) months (Ca. Civ. Code §1798.105). Upon your request, CBS will delete your personal information from its records, and direct any service providers to delete your

personal information for their respective records. However, CBS may deny your request to delete personal information if the personal information is necessary for CBS or its service providers in order to:

- a. Complete the transaction for which personal information was collected.
- b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for such activity.
- c. Debug to identify and repairs errors that impair existing intended functionality.
- d. Exercise free speech, ensure the right of another consumer to exercise that consumer's free speech, or exercise another right provided for by law.
- e. Comply with the California Electronic Communications Privacy Act pursuant to chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- f. Enable solely internal uses that are reasonably aligned with the expectations of you based on your relationship with CBS.
- g. Comply with a legal obligation.
- h. Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Please see 'How to Request' in this Policy on how to request access to your specific information.

Right to Opt-Out

Under the CCPA, you have the right to opt-out of the sale of your personal information (Ca. Civ. Code §1798.120); however, CBS has not sold your personal information in the last twelve (12) months, and will not do so in the next twelve (12) months. You will be contacted if this Policy is amended to allow for the sale of personal information.

How to Request

To exercise your rights under the CCPA and this Policy, please submit a verifiable consumer to request to us:

- By calling 1.888.697.9555
- Sending us an email at corpadmin@cbscuso.com
- In writing, at:
CBS, LLC
C/O CCPA Request
8150 Corporate Park Drive, Suite 300
Cincinnati OH 45242

CBS will consider a request 'verifiable' based on the final language of the CCPA under Ca. Civ. Code §1798.185, as amended.