



COOPERATIVE BUSINESS SERVICES, LLC
PRIVACY POLICY

Effective as of October 1, 2021

<u>FACTS</u>	<u>WHAT DOES COOPERATIVE BUSINESS SERVICES, LLC DO WITH YOUR PERSONAL INFORMATION?</u>
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social security numbers • Employment identification numbers • Account balances, account numbers, and payment history • Income, credit history and credit score • Business and demographic information • Names, addresses, phone numbers, and email addresses • Copies of driver's licenses, passports, and other identifiable information
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Cooperative Business Services, LLC chooses to share; and whether you can limit this sharing.

<u>Reasons CBS can share your personal information</u>	<u>Does Cooperative Business Services share?</u>	<u>Can you limit this sharing?</u>
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	No	N/A
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes - information about your transactions and experiences	No	N/A
For our affiliates' everyday business purposes—	No	N/A

information about your creditworthiness		
For our affiliates to market to you	No	N/A
For non-affiliates to market to you	No	N/A

To limit CBS' sharing	<ul style="list-style-type: none"> • Call the CBS Corporate Administration department at 888.697.9555 • Email the CBS Corporate Administration at corpadmin@cbscuso.com • Mail the below form <p>Please note:</p> <p>If you are a new customer, we can begin sharing your information [30] days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 888.697.9555 or go to www.cbscuso.com

Mail In Form

<p>Leave Blank {OR if you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply my choices only to me }</p>	Mark any/all you want to limit:	
	<input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.	
	<input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.	
	<input type="checkbox"/> Do not share my personal information with non-affiliates to market their products and services to me.	
	Borrower Name	
Address		
City, State, Zip		
Account #		

Who we are	
Who is providing this notice?	<p>Cooperative Business Services, LLC, (“CBS”) is a credit union servicing organization (“CUSO”). As a CUSO, CBS provides various financial and operational services to credit unions. CBS is not a mortgage broker and is not a lender. As a CUSO, the services CBS offers to credit unions may include loan origination, credit analysis, loan processing and servicing, and debt collection. CBS does not loan money and is not the party who ultimately approves or disapproves the loan request.</p> <p>Accordingly, CBS does not and cannot make any promises concerning loan approval or the terms and conditions of any loan that may be offered.</p> <p>If you have any questions concerning the role of CBS, please contact CBS by telephone (888) 697-9555, or by email: corpadmin@cbscuso.com.</p>

What we do	
How does Cooperative Business Services, LLC protect my personal information?	<p>PII collected by CBS is maintained via physical, electronic, and procedural safeguards to protect non-public 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.</p>
How does Cooperative Business Services, LLC collect my personal information?	<p>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.</p>
Why can’t I limit all sharing?	<p>CBS, as a credit union servicing organization, must share information with its affiliate credit unions in order to underwrite, participate, close, service, and workout the loan.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	<p>Your choices will apply to everyone on your account unless you tell us otherwise.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies, including:</p> <ul style="list-style-type: none"> • Ohio Credit Union League, Inc. • Wright-Patt Credit Union, Inc. • AurGroup Financial Credit Union, Inc. • CODE Credit Union, Inc. • Day Air Credit Union, Inc. • KEMBA Financial Credit Union, Inc. • MyUSA Credit Union, Inc. • River Valley Credit Union, Inc. • Telhio Credit Union, Inc.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • Appraisal firms • Environmental firms • Credit reporting agencies • Title agencies • Law firms • Payment processing companies • Auditors • Governmental, local, state, or municipal authorities, as required by applicable law
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • State chartered credit union • Federally chartered credit unions

Cooperative Business Services, LLC may amend this policy at any time by sending a revised version to you via regular mail to the billing address that CBS has on file; via electronic transmission including email; or via facsimile to you. The revised version of this policy will be effective upon delivery of the revised version to you.

CALIFORNIA SPECIFIC PRIVACY POLICY SUPPLEMENT

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.