



California Consumer Privacy Rights Act (CPRA) Notice (01-2023)

About this Notice

This privacy notice explains how Midwest Loan Services a division of University Bank (Bank) collects and uses personal information about you. This notice is provided in compliance with our obligations under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act (CPRA) of 2020.

Terms Used in this Notice as defined by the CPRA

- **Personal Information.** Any information that identifies, relates to, or could reasonably be linked with a particular individual.
- **Sensitive Personal Information.** Sensitive Personal Information means: (1) Personal Information that reveals an individual's (A) social security, driver's license, state identification card, or passport number; (B) 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; (C) precise geolocation; (D) a racial or ethnic origin, religious or philosophical beliefs, or union membership; (E) contents of mail, email and text messages, unless the Bank is the Intended recipient of the communication; (F) genetic data; and (2)(A) processing biometric Information for the purpose of uniquely identifying an individual; (B) Personal Information collected and analyzed concerning an individual's health, sex life, or sexual orientation.
- **Biometric Information.** An Individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or intended to be used, singly or in combination with each other or with other identifying data, to establish individual Identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

Categories of Personal Information We Collect About You

- Personal Identifiers—name, alias, postal address, federal and state-issued identification numbers including Social Security number, driver's license number, and passport number.
- Personal Information—name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, employment, employment history, financial information such as account number and balance, payment card details including credit and debit card numbers, and other financial information.
- Characteristics of Protected Classes—race, national origin, age, sex, marital status.
- Biometric Information—voice recordings.
- Internet or Online Information—Internet or online information such IP addresses and information regarding interaction with our websites, applications, or advertisements.
- Audio and Visual Information—Photographs and voice recordings.
- Professional or Employment-Related Information—work history
- Inferences drawn from any of the above information



How and Why We Use Your Personal Information

- Provide and manage products and services
 - Establish a relationship with you
 - Establish and process transactions for our products and services, including accounts, financing, and payment services
 - Support ongoing management and maintenance of our products and services, including providing account statements, online banking access, customer service, payments and collections, and account notifications.
- Support our everyday operations, including meeting risk, legal, and compliance requirements
 - Perform accounting, monitoring, and reporting
 - Enable information security and anti-fraud operations, credit, underwriting, and due diligence
 - Support audits and investigations, legal requests and demands, exercise and defend legal claims
 - Enable the use of service providers for business purposes
 - Comply with policies, procedures, regulatory and contractual obligations
- Manage, improve, and develop our business
 - Market, personalize, develop, and improve our products and services
 - Conduct research and analysis to drive product and services innovation
 - Support customer relationship management

Whether Personal Information Will Be Sold or Shared

The Bank does not sell, rent, release, disclose, disseminate, make available, transfer or otherwise communicate a consumer's personal information to another business or third party for monetary or other valuable consideration.

We may disclose this information to third parties to help us market our products and services to you or assist us with our own analytic use. We contractually prohibit these third parties from disclosing or using the information for other than the specified purpose. Under these circumstances, this information is not subject to opt-out or deletion.

How Long Your Personal Information Will Be Kept

The Bank will keep your personal information for as long as necessary while you are a Bank customer. Thereafter, we will keep your personal information:

- As required by law or to comply with regulatory, compliance, or contractual obligations
- To respond to any questions, complaints, or claims made by you or on your behalf
- For legal defense or assertion of legal rights

We will not retain your personal information for longer than necessary for the purposes set out in this notice.

Additional information about our privacy practices may be found in our Privacy Policy which is available by visiting our website www.midwestloanservices.com or by writing to us at Midwest Loan Services c/o University Bank, Attention: Privacy Department, 2015 Washtenaw Ave Ann Arbor, MI 48104, to request a copy.