CALIFORNIA NOTICE AT COLLECTION

Effective Date: January 1, 2026

This California Notice at Collection supplements the University Bank dba Midwest Loan Services' Privacy Notice and applies to California residents whose personal information is collected by **Midwest Loan Services** ("Midwest", "we", "us", or "our").

We provide this Notice pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CPRA"). This Notice describes the categories of personal information we collect, the purposes for which we collect and use that information, whether the information is sold or shared, and how long we retain it. The Notice is provided at or before the time personal information is collected, as required by California law.

Categories of Personal Information We Collect

Depending upon your relationship with us, we may collect the following categories of personal information:

Identifiers

- Name
- Mailing address
- Email address
- Telephone number
- Date of birth
- Customer identification number
- Account number
- IP address
- Device identifiers

Personal Information Described in California Civil Code §1798.80

- Signature
- Driver's license or state identification card information
- Passport information
- Financial account information
- Insurance information

Protected Classification Information

- Age
- Marital status
- Military or veteran status when relevant to a product or service

Commercial Information

- Products and services obtained
- Transaction histories
- Deposit and loan account activity
- Payment records

Internet and Electronic Activity Information

- Website interactions
- Online banking/servicing usage information

- Mobile application activity
- Device and browser information
- Cookie and similar technology information

Geolocation Data
- Approximate location information derived from IP addresses
- Precise geolocation information when authorized through a mobile application

Audio, Electronic, and Visual Information
- Recorded customer service calls
- Video surveillance recordings at Midwest facilities
- Secure messaging communications

Professional or Employment Information
- Employer information
- Job title
- Income and employment verification information

Inferences
- Risk assessments
- Fraud indicators
- Product eligibility assessments

Sensitive Personal Information We Collect
Midwest may collect the following categories of Sensitive Personal Information:
- Social Security numbers
- Driver's license, state identification card, or passport numbers
- Financial account, debit card, and credit card numbers
- Account credentials and authentication information
- Security questions and answers
- Precise geolocation information where authorized
- Citizenship or immigration information when required by law
- Information collected in connection with Bank Secrecy Act, anti-money laundering, sanctions screening, and customer due diligence obligations.

Purposes for Collection and Use
We collect, use, and disclose personal information and sensitive personal information as reasonably necessary and proportionate for the following purposes:

Providing Financial Products and Services
- Opening and maintaining accounts
- Processing deposits, withdrawals, transfers, advances, and payments
- Servicing loans and other credit products
- Managing treasury, cash management, and other services

Security and Fraud Prevention
- Verifying customer identity

- Detecting and preventing fraud
- Monitoring for cybersecurity threats
- Protecting customer accounts and Midwest assets

Legal and Regulatory Compliance

- Complying with federal and state regulations
- Satisfying Bank Secrecy Act, Anti-Money Laundering, OFAC, and Know Your Customer obligations
- Responding to lawful requests from regulators, law enforcement, and courts
- Maintaining required records and audit trails

Administration and Operations

- Customer service and communications
- Internal reporting and analytics
- Business continuity planning
- Quality assurance and training
- Product development and service improvement

Marketing

- Marketing products and services consistent with applicable law
- Measuring the effectiveness of marketing campaigns
- Managing customer preferences and communications.

Sale or Sharing of Personal Information

Midwest does **not sell personal information for monetary consideration.**

Midwest may disclose personal information to service providers, contractors, payment processors, card networks, fraud prevention partners, credit reporting agencies, regulators, and other entities as permitted or required by law.

Midwest does **not knowingly share personal information of consumers under the age of 16.**

Midwest's use of website cookies, analytics tools, or advertising technologies constitutes "sharing" under California law, California residents may exercise applicable opt-out rights for marketing communications through Midwest's **Manage Your Communication Preferences** webpage (https://www.midwestloanservices.com/privacyopt-out/).

Retention of Personal Information

We retain personal information and sensitive personal information for no longer than reasonably necessary and proportionate to:

- Provide requested products and services;
- Maintain customer relationships;
- Comply with legal, regulatory, examination, tax, accounting, and record-retention requirements;
- Detect and investigate fraud and security incidents;
- Establish, exercise, or defend legal claims.

Retention periods vary depending on the information collected and applicable legal obligations. In many instances, banking and servicing laws and regulations require retention periods extending beyond the duration of the customer relationship.

Category	Retention Criteria
Customer and account information	We retain information for the duration of the customer relationship and thereafter as required to comply with servicing, consumer protection, anti-money laundering, tax, litigation, and record-retention obligations.
Transaction information	We retain transaction records as necessary to satisfy regulatory obligations, support audits, investigate fraud, and maintain required books and records.
Online activity information	We retain online activity information as long as necessary to secure our systems, improve services, investigate fraud, and satisfy legal obligations.
Audio and video recordings	We retain recordings for security, quality assurance, dispute resolution, and legal compliance purposes.
Sensitive Personal Information	We retain sensitive personal information only as long as reasonably necessary and proportionate for the purposes collected and as required by law.

California Privacy Rights

Subject to applicable exceptions, California residents may have the right to:

- Know the personal information we collect, use, disclose, or share;
- Access specific pieces of personal information;
- Correct inaccurate personal information;
- Delete certain personal information;
- Opt out of the sale or sharing of personal information;
- Limit certain uses of Sensitive Personal Information;
- Not be discriminated against for exercising privacy rights.

To submit a request:

- **Telephone: 1-800-262-6574**
- **Write to**: **University Bank dba Midwest Loan Services**
  Privacy Department
  P.O. Box 209
  Hancock, MI 49930

Automated Decision-Making Technology

Where required by applicable California law, we will provide notices and rights related to our use of Automated Decision-Making Technology ("ADMT"), including any right to access information about certain automated decisions or opt out where such rights apply.

Additional Information Regarding Financial Information

Certain information collected, processed, or disclosed pursuant to the federal Gramm-Leach-Bliley Act ("GLBA") and implementing regulations may be exempt from portions of the California Consumer Privacy Act. This Notice is intended to provide transparency regarding Midwest's overall privacy practices and should be read together with Midwest's Consumer Privacy Notice and any other applicable privacy disclosures.