



Enterprise Information Privacy Policy

Background

Federal law gives consumers the right to limit some but not all sharing of consumer personal information. Federal law also requires companies to tell users how they collect, share, and protect this personal information. Lenders Cooperative, Inc.'s ("LC") Privacy Policy governs the practices and procedures that LC uses to safeguard the personally identifiable information it may gather during the course of business. LC reserves the right to change this Policy and related disclosures from time to time.

Purpose

LC is committed to treating and using personally identifiable information it collects from users of LC's family of Websites (collectively, the Site), as well as activities related to products and services LC offers to its clients. This Privacy Policy governs what information LC collects, why we collect it, how we protect it, and how and why in certain cases we may share it with select other parties.

LC is not a regulated entity; however, we support many customers who are. Accordingly, this policy and its associated guidance, procedures, and processes are designed to support regulatory-compliant practices within LC as well as meet industry expectations in this area.

Ownership

This policy and any related guidance are owned and managed by LC's CEO.

Scope and Applicability

This policy and any supporting controls, processes, and procedures, apply to personally identifiable consumer information obtained by LC through activities it controls directly or via information assets owned, supported, serviced, or operated by LC.

The policy and any supporting controls, processes, and procedures also applies to associates who have access to the above information, including contractors and external third-party vendors that provide, use, or access this data in their interactions for, in conjunction with, or on behalf of LC.

Disclosure or dissemination of LC Privacy Policy

LC will disclose its privacy policy to potentially impacted consumers in a manner appropriate to the type and nature of the interaction or transaction during which LC directly could collect PII,



either individually or in aggregate. The type, nature, and content of this disclosure may change from time to time.

Release of Information

LC does not sell, trade, or rent PII to others; however, LC may be required by law enforcement or judicial authorities to provide PII to the appropriate governmental authorities. In such cases, LC will disclose PII upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. LC fully cooperates with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

Responsibilities of associates

All associates are expected to read, review, and understand this policy, regardless of their roles within the organization. Failure to adhere to the requirements of this policy and its associated guidance, processes, and practices may result in disciplinary action up to and including termination.

Responsibilities of contractors and third-party vendors

This policy, or a summary thereof, is provided to or may be incorporated into agreements with contractors and third-party vendors. Failure to adhere to the requirements of this policy and its associated guidance, processes, and practices may result in action up to and including termination of the relationship with LC.