California Privacy Rights Act (CPRA/CCPA) Notice
Effective January 1, 2026

This California Consumer Privacy Notice ("California Notice") supplements the privacy disclosures provided by University Bank ("Bank", "we", "us", or "our") and applies to California residents whose personal information is collected by the Bank.

Certain personal information collected, processed, shared, or retained by the Bank is subject to federal privacy laws, including the Gramm-Leach-Bliley Act ("GLBA"). If you are a California resident, the California Consumer Privacy Rights Act and the rights and disclosures below apply to you. If you are not a California resident, they do not apply.

1. Categories of Personal Information We Collect

During the preceding 12 months, we have collected the following categories of personal information:

Category	Examples
Identifiers	Name, address, email address, telephone number, account number, driver's license number, passport number
Customer Records Information	Signature, social security number, financial account information, insurance information
Protected Classification Characteristics	Age, marital status, veteran status, disability status, where collected and permitted by law
Commercial Information	Products and services obtained, transaction history, account activity
Internet or Electronic Network Activity	Website usage, online interactions, device information, log data
Geolocation Data	General location derived from IP address; precise geolocation when authorized
Audio, Electronic, Visual Information	Call recordings, security camera footage
Professional or Employment Information	Employment details used for lending, account servicing, or employment purposes
Education Information	Information provided during loan or scholarship-related programs

Category	Examples
Inferences	Preferences, interests, or characteristics derived from other personal information
Sensitive Personal Information	Social Security number, driver's license number, financial account credentials, precise geolocation, biometric information (if collected), racial or ethnic origin where legally collected, and other information designated as sensitive under California law

2. Sources of Personal Information

We collect personal information from:

- You directly.
- Your transactions with us.
- Credit reporting agencies.
- Service providers and business partners.
- Public records.
- Government agencies.
- Online technologies such as cookies and similar tools.
- Fraud prevention and identity verification providers.

3. Purposes for Collecting, Using, and Disclosing Personal Information

We collect, use, and disclose personal information for the following business and commercial purposes:

- Opening and maintaining accounts.
- Processing transactions.
- Providing banking, lending, investment, trust, and treasury services.
- Customer service and support.
- Fraud prevention, security, and authentication.
- Identity verification and Know-Your-Customer compliance.
- Anti-money laundering compliance.
- Legal, regulatory, and audit obligations.
- Risk management and internal operations.
- Improving products, services, and digital experiences.
- Marketing and advertising, where permitted by law.
- Protecting the rights, safety, and property of customers and the Bank.

We only collect and retain personal information that is reasonably necessary and proportionate to achieve the purposes disclosed to consumers.

4. Retention of Personal Information

We retain personal information only for as long as reasonably necessary to fulfill the purposes for which it was collected, including:

- Providing requested products and services.
- Meeting legal and regulatory requirements.
- Complying with recordkeeping obligations.
- Resolving disputes.
- Detecting and preventing fraud.
- Enforcing our agreements.

Retention periods vary depending upon the nature of the information, regulatory requirements, and operational needs.

Category	Retention Criteria
Customer and account information	We retain information for the duration of the customer relationship and thereafter as required to comply with banking, 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.

5. Disclosure of Personal Information

During the preceding 12 months, we may have disclosed personal information to:

- Service providers.
- Contractors.
- Affiliates.
- Regulators and government agencies.
- Payment processors.
- Fraud detection and identity verification providers.
- Professional advisors.
- Auditors and examiners.
- Entities involved in mergers, acquisitions, or corporate transactions.

We require recipients to protect personal information and use it only for authorized purposes.

6. Sale or Sharing of Personal Information

The Bank **does not sell personal information** in exchange for monetary consideration. The Bank does not "share" personal information for cross-context behavioral advertising as defined under California law.

If the Bank shares personal information for cross-context behavioral advertising, California residents have the right to opt out of such sharing through:

- The "Your Privacy Choices " link;
- Recognized opt-out preference signals; or
- Other methods described in this Notice.

7. Use and Disclosure of Sensitive Personal Information

We use sensitive personal information only:

- To provide requested financial products and services;
- To verify identity and prevent fraud;
- To comply with legal obligations;
- For security and risk management purposes; and
- For other purposes permitted by California law.

We do not use or disclose sensitive personal information for purposes that would require us to offer a right to limit unless required by applicable law. If applicable, consumers may exercise their right to limit the use and disclosure of sensitive personal information through the methods described below.

8. California Privacy Rights

Subject to applicable exceptions and exemptions, California residents have the following rights:

Right to Know
You may request information regarding:

- Categories of personal information collected.
- Categories of sources.
- Business or commercial purposes for collection, use, disclosure, sale, or sharing.
- Categories of recipients.
- Specific pieces of personal information collected.

Right to Delete
You may request deletion of personal information collected from you, subject to legal exceptions.

Right to Correct
You may request correction of inaccurate personal information maintained by the Bank.

Right to Data Portability
You may request access to personal information in a portable format, where required by law.

Right to Opt Out of Sharing
You may direct us not to share your personal information.

Right to Limit Use of Sensitive Personal Information
You may request limitations on our use of sensitive personal information where required by California law.

Right Against Discrimination
We will not discriminate against you for exercising your California privacy rights.

9. 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.

10. Exercising Your Privacy Rights

You may submit privacy requests by:

- Calling: 1-800-368-7987
- Emailing: cpraprivacy@university-bank.com
- Writing to: **University Bank**
  Privacy Department
  2015 Washtenaw Ave
  Ann Arbor, MI 48104

We will verify your identity before processing requests as required by law. When requesting information regarding the Personal Information the Bank has collected, please indicate the date range for which you are making the request. Authorized agents may submit requests on your behalf, provided that the required authorization is obtained and the identities of both the authorized agent and the individual to whom the request relates are verified.

11. Opt-Out Preference Signals

The Bank recognizes and processes legally required opt-out preference signals in accordance with California law. If your browser or device transmits a recognized opt-out preference signal, we will process that signal as a request to opt out of applicable sales and sharing of personal information.

12. Financial Incentives

The Bank does not generally offer financial incentives in exchange for personal information. If we offer a program that constitutes a financial incentive under California law, we will provide a separate Notice of Financial Incentive describing the material terms.

13. Contact Information

If you have questions about this California Privacy Notice, please contact:
University Bank
Privacy Department
2015 Washtenaw Ave
Ann Arbor, MI 48104
1-800-368-7987