

RESEDA GROUP PRIVACY POLICY

Revised May 17, 2024

GENERAL POLICY STATEMENT

The Reseda Group recognizes its responsibility to safeguard and protect the nonpublic personal information of consumers. The purpose of this policy is to set forth guidelines under which such information may be shared with third parties, the circumstances in which we will provide disclosures to our customers regarding the sharing of such information, and the measures employed to protect and keep such information confidential. It is the intent of the Reseda Group to abide by all applicable laws and regulations governing privacy, including but not limited to Consumer Financial Protection Bureau Regulation 1016 (Privacy of Consumer Financial Information – Regulation P) to the extent applicable and the California Consumer Privacy Act of 2018 (CCPA). Management is permitted to make changes to this policy as permitted by law, providing adequate notice is provided under applicable law or regulation and the Board is notified of the changes made at the Board meeting following notice being provided to consumers.

GUIDELINES

- (1) **Collection of Information:** The Reseda Group will only collect information that is necessary to conduct its business. In the course of delivering products and services, the Reseda Group obtains nonpublic personal information from consumers. This information is necessary to either comply with a state or federal law or regulation, or to provide effective and competitive services.
- (2) **Consumer Access:** Upon request, the Reseda Group will provide consumers with access to their own general account information. Consumers do have a responsibility to protect their nonpublic private information and to inform the Reseda Group of unauthorized access to their accounts or inaccurate information maintained by the Reseda Group.
- (3) **Maintenance of Information:** The Reseda Group takes reasonable steps to assure that consumer information it gathers is accurate and maintained in a manner to assure its accuracy. In the event inaccurate information is discovered, the Reseda Group will provide directions for consumers to correct the inaccuracy as promptly as possible, or will correct the inaccuracy internally.

- (4) **Sale of Information Prohibited:** It is the policy of the Reseda Group not to sell consumer information to any third party under any circumstances.
- (5) **Sharing of Account Numbers Prohibited:** It is the policy of the Reseda Group not to share any account numbers or similar access numbers of consumers except as required or authorized by law.
- (6) **Disclosure of Information to Third Parties:** In an effort to provide products and services and to comply with state and federal laws and regulations, the Reseda Group does share nonpublic personal information with third parties. Such information sharing is done in compliance with applicable laws and regulations, including providing required notices to consumers that such information sharing takes place.
- (7) **Responsibility of Non-Affiliated Third Parties:** The Reseda Group selects its service partners with due diligence and care. If the Reseda Group will share information with a non-affiliated service partner, such service partner will only be approved if it has established privacy policies that are consistent with the privacy policies of the Reseda Group and the laws and regulations governing privacy. Where appropriate, the Reseda Group will protect nonpublic personal information through contractual provisions that prohibit non-affiliated service partners from using information for any other purpose than for which the Reseda Group provides the information to the service partner.
- (8) **Notice of Information Sharing:** The Reseda Group provides consumers with the Reseda Group Privacy Notice and any other notices related to privacy policies and practices as required by law or regulation, including where appropriate, an opportunity to “opt-out” of information sharing. It is the intent of the Reseda Group to properly record and honor all requests from consumers to “opt-out.”
- (9) **Information About Former Customers:** In the event a person who was a customer of the Reseda Group is no longer a customer, the Reseda Group will maintain only that information which is necessary to provide products or services that person is receiving from the Reseda Group at the time of becoming a former customer, as required by law or regulation, and consistent with the Record Retention Policy of the Reseda Group.
- (10) **Internal Security and Privacy:** The Reseda Group maintains a comprehensive risk management system to protect the Reseda Group and consumers. This system is intended, in part, to ensure safety and confidentiality of consumer records, protect

against anticipated threats or hazards to the security of such records, and protect against unauthorized access to, or use of, records that could result in substantial harm or inconvenience to a consumer or to the Reseda Group. Appropriate security coding and other available technology will be used to protect against unauthorized access to personal records, ensure accuracy and integrity of transactions and communications, and protect confidentiality.

The Reseda Group will restrict access to nonpublic personal information it obtains to only those employees, members of the Board of Directors, and committee members who have a specific business purpose for accessing and utilizing such information. All employees, members of the Board of Directors, and committee members shall be required to maintain the confidentiality and privacy of all personal information they access.

CFPB REGULATION P

To the extent applicable, the Reseda Group will comply with the requirements of CFPB Regulation P. The Reseda Group will maintain appropriate procedures and a publicly available Privacy Notice provided to applicable consumers to facilitate compliance with Regulation P.

CALIFORNIA CONSUMER PRIVACY ACT OF 2018

The Reseda Group will comply with the requirements of the California Consumer Privacy Act of 2018 (CCPA), which are applicable to California residents only. The Reseda Group will maintain appropriate procedures and a publicly available California Consumer Privacy Act Disclosure to facilitate compliance with the California Consumer Privacy Act of 2018.

Reseda Group Privacy Notice

Reseda Group (“we,” “us,” or “our”) understands that privacy is important to our customers, potential customers, website visitors, and others who interact with us (collectively “you,” or “your”). This Privacy Policy explains how we collect, use, and share your information, whether personally identifiable or non-personally identifiable. This Privacy Policy applies to all information received by us, both online and offline. By visiting our website or otherwise interacting with us you agree to this Privacy Policy and any other terms located on our website.

1. **Our Commitment to Our Customers.** We will not sell, share, or trade our customers’ names or personal information with any other entity, nor send mailings to our customers on behalf of other organizations, except in accordance with this privacy policy.

2. **Information We Collect.** We collect several categories of information by the nature of our work. Those categories are described below. We may collect information from multiple categories from you.
 - 2.1. **Customer Information.** We collect information about customers and potential customers, including personal information that the customer voluntarily provides to us like the donor’s name, address, telephone number, email address, other contact information, prior transaction history, and any financial transaction information necessary to process transactions, as well as any other information that you may choose to provide in connection with a transaction. We may also collect additional information about you from other sources and combine it with information you voluntarily provide to us.

 - 2.2. **Website Visitor Information.** We collect both personally identifiable information and non-personally identifiable information about you when you visit and interact with our website. For example, we receive information related to how you use our website, network traffic data, and information from and about the devices you use to access our website, including information like IP addresses, the type of browser and device you use, the web page you visited before coming to our sites, and identifiers associated with your devices. Your devices (depending on their settings) may also transmit location information to us. Additionally, we may receive information about you when you visit our website through various social media networks. Our website also involves the use of “cookies.” Cookies are small files that a website asks your browser to store on your device. In general, cookies allow us to improve your ability to use our website and your

experience. The data we receive is often dependent upon your privacy settings in your browser or social media account. You should review, and if necessary, adjust your privacy settings.

3. **How We Use Information.** We may use the information that you provide for any lawful purpose, and including, but not limited to, the uses below:

- To communicate with you, including to share information that you have requested, or to inform you of promotional offers that may be of interest to you;
- To process your transactions, including to notify you of your transaction, provide a receipt, and ship anything that we agreed to provide to you;
- To improve and personalize our website, including to improve and personalize the performance, content, and layout of our web pages;
- To protect our rights or the rights of others;
- To comply with the law and to maintain the security of our website; and
- As otherwise disclosed at the time of collection or use.

4. **How We Share Information.** We do not rent, share, or sell your personal information to outside marketers. We may share personal information with our clients and service providers, such as credit unions, fintech organizations, marketing firms, vendors who manage printing, shipping and fulfillment, technology providers, and credit card processors, who may use or disclose your information as needed to perform services on our behalf or to comply with the law. We may share your information when required by law, including pursuant to a subpoena, court order, governmental inquiry, or other legal process or as necessary to protect our rights, users, clients, consumers, and services. We may share information that has been de-identified or aggregated, or any other technical information, without limitation.

5. **Children's Privacy.** Protecting the privacy of young children is especially important. For that reason, we do not knowingly collect or solicit personal information from anyone under the age of 13. In the event that we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we

might have any information from or about a child under 13, please contact us at privacy@resedagroup.com.

6. **Links to Other Websites.** To the extent our website and/or products contain links to any websites not operated by us, the privacy policy (if any) on that website will control and our Privacy Policy will not apply. We cannot control and are not responsible for the information collection, use, and disclosure practices of third parties. We encourage you to review other websites' privacy practices and policies, if any, before providing any personally identifying information to them. We are not responsible for the practices, content or information of these websites, or any other use of the linked website.
7. **Future Changes to our Privacy Policy.** We may revise this Privacy Policy from time to time, and will post the most current version on our website.
8. **Contact Us.** If you have any questions about our Privacy Policy, contact us at privacy@resedagroup.com

**California Consumer Privacy Act Disclosure
(For California Residents Only)**

Updated 5/17/2024

For California Residents

Purpose

This California Consumer Privacy Act Disclosure (Disclosure) explains how The Reseda Group collects, uses, and discloses the personal information of California consumers covered by the California Consumer Protection Act of 2018 (CCPA).

As used in this notice, the words “we”, “us”, and “our” mean The Reseda Group and the words “you”, “your”, and “consumer” mean California consumers as defined in the CCPA.

Please read this notice carefully to understand our policies and practices regarding your personal information and how we will treat it. This notice is provided pursuant to the CCPA.

Applicability

This Disclosure applies to California consumers. Under the CCPA, a ‘consumer’ is defined as a natural person who is a California resident. Any terms defined in the CCPA have the same meaning when used in this notice. The CCPA shall not restrict The Reseda Group’s ability to comply with any federal, state, or local laws.

The specific personal information of California consumers that we collect and disclose will vary based on our relationship or interaction with that individual. This policy does not apply to information collected by our clients, such as credit unions and fintech organizations. For information regarding our clients collection of consumer data, please visit our clients disclosure pages.

Collection and Disclosure of Personal Information

The Reseda Group collects personal information of California consumers that identifies, relates to, or describes a particular consumer or household. The following table displays the 11 categories of personal information as defined in the CCPA and indicates whether The Reseda Group collects any information from each individual category. The Reseda Group has collected the following categories of personal information from consumers within the last 12 months:

CATEGORY	EXAMPLES
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Personal identifiers, including those listed in other California statutes	Real name, alias, Social Security number, passport number, other government issued number, Green Card number, driving license number, telephone number, email address, postal address, account name, online identifier, device identifier, IP address
Characteristics of protected classifications under California or federal law	Date of birth, age, gender, military or veteran status, marital status, nationality, citizenship, request for family care leave, request for leave for employee's own serious health condition, request for pregnancy leave
Commercial Information	Records of personal property; products and service purchased, obtained, or considered; purchasing or consuming histories or tendencies
Biometric Information	None.
Internet or other electronic network activity information	Browsing history, search history, information regarding your interaction with a website, application or advertisement
Geolocation data	Any information used to identify your physical location
Sensory data	Audio, electronic, visual
Professional or employment-related information	Title, salary, employment files, references
Non-public education information	Details of your education and qualifications
Inferences drawn from other personal information	Any derivation of information, data, assumptions, or conclusions drawn from any of the above categories used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
Sensitive personal information	None.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, information you provide to us when using any of the Reseda Group products or services, using any Reseda Group website, or responding to Reseda Group advertisements or surveys.
- Indirectly from you. For example, information about you that we collect in the course of providing services to you.
- From third parties and service providers that interact with us in connection with the services we perform.
- From our Websites and Mobile Applications.

The categories of third parties to whom we disclose personal information for our business purposes described in this privacy disclosure are:

- Vendors and Services Providers who provide services such as data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing, and marketing research activities.
- Partners and Third Parties who provide services such as insurance, payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote The Reseda Group to customers.
- Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage origination and servicing, vehicle loan processes and aggregators (at the direction of the customer). Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage services, vehicle loan processes and aggregators (at the direction of the customer).
- Government Agencies as required by laws and regulations.

Use of Personal Information

We may use or disclose each of the categories of personal information identified above to each of the categories of third parties described in this disclosure for one or more of the following business purposes:

- To fulfill or meet the reason for which you provided the information. For example, to fulfill orders for products or services.
- To provide you with services that you request from us .
- To provide you with email alerts, marketing information, and other notices concerning our products and services, or other news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For research, analysis, and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our members, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sale of Personal Information

In the past 12 months, The Reseda Group has not sold personal information subject to the CCPA for monetary or other valuable consideration, including personal information of minors under the age of 16. The Reseda Group does not sell personal information subject to the CCPA of any consumer regardless of age.

Your Rights under the CCPA

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights.

(1) Access to Specific Information Rights (Right to Know)

You have the right to request that we disclose certain information to you about our collection and use of your personal information currently and over the past 12 months. Once we receive your request and verify your identity, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you, subject to certain exceptions.
- If we disclosed your personal information to a service provider for a business purpose, we will identify the personal information categories that each service provider was provided.

(2) Deletion Request Rights (Right to Delete)

You have the right to request that we delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exemption applies. For example, we will not delete data that falls into one of the following exempt categories, including information needed to:

- Complete a transaction for which the personal information was collected.
- Fulfill the terms of a written warranty or contract between you and The Reseda Group.

- Provide a good or service requested by you or reasonably anticipated within the context of your dealings with The Reseda Group.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another member to exercise their right of free speech, or exercise another right provided for by law.
- Enable solely internal uses that are reasonably aligned with the expectations of your relationship with The Reseda Group or are lawful uses that are otherwise compatible with the context in which you provided the information.
- Comply with a legal obligation.

(3) Be free from unlawful discrimination for exercising your rights under the CCPA (Right to Non-Discrimination)

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We do not offer certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels.

In some cases, we may not be able to honor your access or deletion request. For example, we will not honor your request if we cannot verify your identity. Additionally, we will not honor your request where an exception applies, such as where your personal information that we maintain about you is not subject to the CCPA's access or deletion rights. We will advise you in our response if we are not able to honor your request due to an exemption provided by the CCPA.

How to Exercise Your Rights

To exercise the access and deletion rights described above, please submit a request to us by either:

- E-mailing the following information to privacy@resedagroup.com:
 - Subject Line: CCPA Request
 - Within E-mail:
 - First and Last Name
 - Street Address
 - City
 - State
 - Zip Code
 - E-mail Address
 - Phone Number
 - Answer Yes or No:
 - Do you or did you have a relationship with Reseda Group?
 - Answer what type of request is being submitted:
 - I want to know personal information that has been collected or shared.
 - I want to delete the personal information you have about me (exceptions may apply).
 - I want to correct the personal information you have about me.

Upon submission of your request, we will take steps to verify your identity. The questions we ask to verify identity may vary, depending upon your relationship with the Reseda Group. The information you provide in response to our efforts to verify your identity will be used solely to verify your request. If we are unable to verify your identity, your request will be denied.

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you are an authorized agent of a California consumer, you can use either of the two methods mentioned above to submit a CCPA request on behalf of the California consumer for whom you are an authorized agent. Upon receipt of your request, The Reseda Group must verify that the California consumer has granted you with authority to submit a request on their behalf. The steps we take to verify your authority as an agent may vary, depending on how that authority was granted to you. If we are unable to verify that authority as an agent was granted to you, your request will be denied.

Response Timing and Format

We strive to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason for the extension period in writing. We will deliver our written response to you by mail or via eMessage. Any disclosures we provide will cover the 12-month period preceding the receipt of the verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless the request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. Cost estimates will be prepared based on the estimated hours involved.

Right to Opt-Out of Personal Information Sales

As indicated, The Reseda Group does not sell personal information subject to the CCPA. Given this practice, The Reseda Group is exempt from providing a notice of right to opt-out per the CCPA and its implementing regulations.

Changes to this California Consumer Privacy Act Disclosure

If we make material changes to how we treat consumers' personal information, we will update this Disclosure and post the revised version on this page with a new "Updated" date.

Questions

You may contact us with questions about this CCPA Disclosure by:

(1) E-mailing the Reseda Group at privacy@resedagroup.com

(2) Writing us at:

*ATTN: Reseda Group
3777 West Rd.
East Lansing, MI 48823*