

**FACTS**

**WHAT DOES CORNERSTONE CAPITAL BANK, SSB, WHICH ALSO OPERATES AS CORNERSTONE HOME LENDING, ROSCOE STATE BANK, AND OTHER DIVISIONS, DO WITH YOUR PERSONAL INFORMATION?**

**Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**What?**

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and payment history
- Credit history and credit score

When you are no longer our customer, we continue to share your information as described in this notice.

**How?**

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reason **CORNERSTONE CAPITAL BANK, SSB** chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does <b>CORNERSTONE CAPITAL BANK, SSB</b> share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	No	We do not share
<b>For our affiliates' everyday business purposes</b> - information about your creditworthiness	No	We do not share
<b>For nonaffiliates to market to you</b>	No	We do not share

**Questions?**

Call one of the following for assistance:  
 Cornerstone Capital Bank, SSB – 833.567.2265  
 Cornerstone Home Lending – 855.937.0771  
 Cornerstone Mortgage Servicing – 866.500.0756  
 Roscoe State Bank – 325.766.3311

Who we are	
Who is providing this notice?	This privacy notice applies to Cornerstone Capital Bank, SSB, and its operating divisions, including Cornerstone Home Lending and Roscoe State Bank.

What we do	
How does CORNERSTONE CAPITAL BANK, SSB protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does CORNERSTONE CAPITAL BANK, SSB collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• open an account or make deposits or withdrawals from your account</li> <li>• pay your bills or apply for a loan</li> <li>• provide employment information or give us your employment history</li> <li>• use your debit card or other credit products</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes - information about your credit worthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <b><i>CORNERSTONE CAPITAL BANK, SSB does not share with our affiliates.</i></b></li> </ul>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <b><i>CORNERSTONE CAPITAL BANK, SSB does not share with nonaffiliates so they can market to you.</i></b></li> </ul>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• <b><i>CORNERSTONE CAPITAL BANK, SSB does jointly market.</i></b></li> </ul>

## **POLICY STATEMENT**

This Privacy Policy ("Policy") applies to your use of the Cornerstone Capital Bank, SSB, and its operating divisions' ("Cornerstone") website, mobile application or other online service (collectively, the Online Services). This Policy describes how Cornerstone may collect, share, and use information that is captured while you use the Online Services. Please keep in mind that:

- This Policy is intended to cover only our U.S. customers. Any international users of the Online Services should be aware that by using the Online Services, your information may be transferred to or processed in the United States.
- Personal information that you share on Cornerstone-managed social media pages, such as Facebook and Twitter, are subject to the privacy policies and terms of use of those platforms. Please refer to those policies before posting any content to those pages. You should NEVER provide personal information to Cornerstone through social media.
- We do not knowingly collect personal information from individuals under the age of 13 without parental consent. Our online services are not intended for children under 13.
- This Policy does not apply to information that we may collect through offline channels.
- By continuing to use the Online Services, you consent to the terms of this Policy.

What Information Do We Collect and How Do We Collect that Information?

### **Personal Information**

We collect Personal Information that you provide to us on the Online Services via forms, applications, surveys, and other online fields. This Personal Information may include your name, postal address, e-mail address, telephone numbers, loan number, username, and password.

### **Non-Personal Information**

In addition to the Personal Information that we collect from you as described above, we may collect some Non-Personal Information from your use of the Online Services. This Non-Personal Information may include information concerning the browser you are using, as well as information collected through cookies, pixel tags, clear gifs, and other technologies to measure the effectiveness of our communications, to compile statistics about usage and response rates, and to assist us in resolving issues that may arise on the Online Services. Non-Personal Information does not include any information that is associated with Personal Information. The information that is captured about your visit may be used in a variety of ways, such as to monitor and maintain information about your visits to the Online Services, to help us identify and address problems with and to improve the Online Services, to analyze web traffic trends, and to help protect the security and integrity of the Online Services.

## **What Are Cookies?**

Our site also uses "cookies" (small data files stored on your computer) and other tracking technologies to collect information about your visit to our site. The cookies and tracking technologies we use do not capture Personally Identifying Information. The information that is captured about your visit may be used in a variety of ways, such as to monitor and maintain information about your visits to our site, to help us identify and address problems, to improve our site, to analyze web traffic trends, and to help protect the security and integrity of our site. You may set your browser not to accept cookies or to notify you when you receive cookies, giving you the opportunity to decide whether to accept cookies. If you do not accept cookies, you may still use our site, but your experience may be degraded. We may also use pixel tags (also known as "clear gifs," "Web beacons," or "1-by-1gifs") on our site. These may be used in connection with certain pages of our site or with email messages to measure the effectiveness of our communications and our marketing campaigns, to compile statistics about usage and response rates, and to assist us in resolving issues that may arise on our site.

## **How Do We Use Your Information?**

The information Cornerstone collects is used to improve your service and experience on the Online Services. We may use your information:

- to respond to your inquiries, fulfill your requests, and process transactions;
- to communicate to you important information regarding this website and/or other administrative information;
- for our business purposes, such as data analysis, audits, developing new products, enhancing our sites, improving our services, identifying usage trends and determining the effectiveness of our promotional campaigns;
- for risk control, to comply with laws and regulations and to comply with other legal process and law enforcement requirements;
- if you register a profile with us, to contact you, via the phone or e-mail;
- for marketing purposes, such as notifying you of company news and promotions; and
- to personalize your experience or to improve the Online Services and website offerings by allowing us to customize the content and/or layout of our page based on feedback and information we receive from you.

## **Who Do We Share Your Information With?**

We do not sell, trade, or otherwise transfer your Personal Information to outside parties without your consent, except as described in this paragraph. We may, without your consent, disclose your Personal Information to trusted third parties who assist us in operating the Online Services, processing transactions, conducting our business, or servicing you, so long as these parties agree to keep this information confidential, consistent with this Policy. We may also, without your consent, disclose this information to third parties: (1) when we have reason to believe that such disclosure is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, customers, or other users of the Online Services, or anyone else who could be harmed by such activities; or (2) to respond to judicial

process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law, such as to comply with a subpoena or similar legal process. Non-Personal Information collected at the Online Services may be provided to third-parties for marketing, advertising, or other uses.

### **How Do We Protect Your Information?**

We use security measures designed to maintain the safety of your information, including encryption technologies, to protect against the loss, misuse, or alteration of information that we have collected from you at the Online Services. For example, Cornerstone employs procedures to (1) protect the confidentiality of Social Security numbers, (2) prohibit unlawful disclosure of Social Security numbers, and (3) limit access to Social Security numbers. Unfortunately, no security technology is completely secure, and you should remember that the Internet may not be a secure means of communication.

### **Do We Track Our Visitors Online?**

- Some web browsers may transmit "do-not-track" or similar signals to the websites with which the user communicates. There currently is no industry standard for how websites should respond when they receive such a signal. The Online Services do not respond to web browsers' do-not-track signals.
- Some of the content, advertisements, and functionality on the Online Services may be provided by third parties, including Facebook. We also use third party service providers to provide us with analytics services so we can improve the Online Services. These third parties may collect information about your use of the Online Services through cookies web beacons and other storage technologies, and this information may be collected over time and combined with information collected across different websites. These third parties will only collect Personal Information if you provide it directly to them. The only way to completely opt out from the collection of information by such third parties through cookies or other tracking technology is to actively manage the settings on your browser or mobile device to delete and disable cookies and other tracking and storage technologies.

### **What About Third Party Links in the Online Services?**

- The Online Services may contain links to other websites that we feel may be of interest to you. We are providing these links to you as a convenience, but these external websites may have different privacy policies than the Online Services. Please review the privacy policy of any site you access through our site as any information that you share with third party sites are not subject to this Policy.

### **How Will We Inform You of Changes to this Policy?**

We may update this Policy from time to time. Any changes to this Policy will be posted on our website along with the date of the revision. The changes to this Policy will become effective as soon as they are published on this website. We encourage to you to review this Policy periodically.

## **Do You Have Questions?**

If you have any questions about this Policy, please contact us at one of the following for assistance:

- Cornerstone Capital Bank, SSB – 833.567.2265
- Cornerstone Home Lending – 855.937.0771
- Cornerstone Mortgage Servicing – 866.500.0756
- Roscoe State Bank – 325.766.3311

## **California Consumer Privacy Act ("CCPA"):**

### **Pursuant to the CCPA, all California residents maintain the following rights:**

1. The right to request that a business that collects a consumer's personal information disclose to that consumer the categories and specific pieces of personal information the business has collected.
2. The right to request that a business delete any personal information about the consumer which the business has collected from the consumer.
3. The right to request that a business that collects personal information about the consumer disclose to the consumer the following:
  - The categories of personal information it has collected about that consumer.
  - The categories of sources from which the personal information is collected.
  - The business or commercial purpose for collecting or selling personal information.
  - The categories of third parties with whom the business shares personal information.
  - The specific pieces of personal information it has collected about that consumer.
4. The right to request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to that consumer:
  - The categories of personal information that the business collected about the consumer.
  - The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
  - The categories of personal information that the business disclosed about the consumer for a business purpose.
5. The right, at any time, to direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information. This right may be referred to as the right to opt out.

In consideration of the above list of California consumer rights, CORNERSTONE CAPITAL BANK, SSB is required to disclose that we do not sell any personal information collected. Accordingly, the rights afforded to California consumers regarding the sale of personal information are not applicable.

**To exercise any of the aforementioned rights, please use one of the following two methods:**

1. Toll-free phone number:
  - Cornerstone Capital Bank, SSB – 833.567.2265
  - Cornerstone Home Lending – 855.937.0771
  - Cornerstone Mortgage Servicing – 866.500.0756
  - Rosco State Bank – 325.766.3311
2. Online submission: [Form](#) to:
  - Cornerstone Capital Bank, SSB - [clientservices@cornerstonecapital.com](mailto:clientservices@cornerstonecapital.com)
  - Cornerstone Home Lending - [consumerconcerns@houseloan.com](mailto:consumerconcerns@houseloan.com)

**CORNERSTONE CAPITAL BANK, SSB does collect and has disclosed the following categories of personal information, which are collected and disclosed in the normal course of business for the purposes of originating, underwriting, closing and the servicing of residential mortgage loans:**

1. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
2. Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.
3. Characteristics of protected classifications under California or federal law.
4. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
5. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
6. Professional or employment-related information.