

Radius Group, LLC dba BankLabs

Privacy Policy

When we provide services to clients, we often handle personal information as a processor (for example, the hosting of client data on our loan administration products). This means we process the information solely at the direction of our clients who retain control of the information.

We also collect personal information from visitors to this website, recruitment applicants, and attendees at BankLabs events.

We use personal information to deliver our services to clients. For our own purposes, we also use personal information to analyze and improve how we deliver those services, to contact representatives of our clients or prospective clients and to market to them.

The primary point of contact at BankLabs for questions regarding your personal information is privacy@banklabs.com.

Agreement

Your use of this website and other BankLabs websites and providing personal information collected over this and other BankLabs websites constitutes your understanding of, and agreement to, the practices described in this Privacy Policy and elsewhere on such websites, as well as any subsequent updates. Please see the additional information under the heading **Legal** for more information about our online terms of use and policies in general.

Collecting Personal Information

We collect personal information if:

- (a) you use this or any other BankLabs website;
- (b) you inquire about, or engage BankLabs to provide its Services, including as a representative of your employer or client;
- (c) use of personal information is reasonably necessary to provide our Services, including when your information is disclosed to us by our client, who may be your bank or other financial institution, your employer or a service provider, and we may obtain your personal information from a range of public or subscription source, directly from you, or from your associates or persons known to you;

- (d) you apply for a position at BankLabs;
- (e) you attend a BankLabs hosted or sponsored event or webinar;
- (f) you invest in BankLabs; or
- (g) you contact us with any other inquiry, complaint or notice.

Types of Personal Information collected and uses

The following is a summary of the types of personal information we collect, and the purposes for which that information is used:

Website Users

We collect your name, address, e-mail address, phone number and other information that you voluntarily provide. We also collect other background information about you in connection with career-related inquiries that you submit to us.

We also may automatically collect personal information, including your IP address, device identifier, browsing patterns, click stream data, and web protocol elements to ensure the effective operation of our website. Tracking information is stored in an anonymous, aggregated and non-personal format, and is used to understand and analyze trends, to administer our websites and to learn about user behaviors on our websites.

We also may use IP addresses to help identify you when we feel that it is necessary to enforce compliance with this Privacy Policy, to protect our Services, websites, systems, information, employee's business partners, subsidiaries, affiliates, users, customers or others, or when required by law or for law enforcement purposes.

Former, current and Prospective Clients

If you or the organization you are associated with becomes a client of BankLabs, we may process personal information in order to:

- (a) confirm your identity and related professional background;
- (b) conduct background checks;
- (c) carry out client communication, service, billing and administration;
- (d) serve and resolve client complaints;

- (e) send to our clients newsletters, promotional material and other marketing communications; and
- (f) invite our clients to events and arrange for and administer those events.

Performing Services for Clients

In most cases, personal information is provided to us in strict confidence and subject to contractual restrictions on its use and disclosure.

Other Uses

If you apply for a position at BankLabs, we will need to collect personal information in order to consider your application, including during any interview and assessment phase.

If we engage you as a vendor, supplier or contractor, we will need to collect personal information in order to complete transactions and appropriate screening activities.

If you contact us for any other reason, we will collect basic contact details, as well as other information relevant to your inquiry, in order to resolve that inquiry.

DISCLOSURE TO THIRD PARTIES

We will will take steps designed to prevent disclosure your personal information to third parties, except as provided in this Privacy Policy, or unless we have your permission or unless it is required or permitted by law. BankLabs will share information with its contractors, consultants and vendors engaged by BankLabs to provide services. These third parties will be subject to their own data protection requirements providing the same or greater level of security provided by BankLabs. In most cases, they will have entered into a written agreement with BankLabs which addresses the protection of your personal information.

We also may disclose your personal information for the purpose of:

- responding to requests from law enforcement or regulatory agencies;
- preventing or detecting a crime;
- establishing legal rights or to investigate or pursue legal claims;
- a merger, acquisition involving BankLabs; and
- preventing risk of harm to an individual.

INFORMATION SECURITY

We have reasonable technical safeguards, security policies and procedures in place designed to protect personal information from unauthorized loss, misuse, alteration or destruction. We

place confidentiality requirements on our team members and service providers, limiting access to your personal information.

Nevertheless, security cannot be absolutely guaranteed against all threats.

Additional Information for California Residents

California privacy laws, including the California Consumer Privacy Act (“CCPA”), generally require that businesses provide California residents information about how we use their personal information, and this document is intended to satisfy that requirement. The CCPA notice, however, does not apply to circumstances where we receive data and use it solely to provide service to a client, and function as a “service provider” within the meaning of the CCPA.

In addition, this policy does not apply to information that we collect about employees or in the course of providing or receiving business-to-business services.

Categories of Personal Information that We Collect, Disclose and Sell

We collect the following categories of personal information:

- Name, contact information identifiers;
- Usage data, such as Internet or other electronic network activity, including without limitation, browsing history, search history and interaction with our websites;
- Geolocation data, including precise geographic location information about a particular individual or device;
- Professional or employment-related history;

We do not collect any other categories of personal information defined in the CCPA.

For all of the personal information that we collect, we do not disclose it except, in providing services to our clients, to comply with applicable laws and regulations, and we do not sell any such personal information.

California Residents’ Rights

The following is a summary of California law granting certain rights to California residents and imposing certain restrictions on particular business practices:

Right to Opt Out. California residents have the right to opt out of our sale of their personal information. BankLabs does not and will not sell your personal information.

Minors. We do not collect information about residents who we know are younger than 16 years old.

Notice at Collection. We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

Verifiable Requests to Delete and to Know. Subject to certain exception, California residents have the right to make the following requests, at no charge, up to twice every 12 months:

Right of Deletion. Except where we may retain personal information for a list of exempt purposes, California residents have the right to request deletion of their personal information.

Right to Know and to Receive a Copy. California residents have the right to request a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either electronically or by mail and, to the extent technically feasible, in a portable and readily useable format that allows the individual to transmit this information to another entity without hindrance.

Right to Know and Right to Information. California residents have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including:

- categories of personal information collected;
- categories of source of personal information;
- business and commercial purposes for collecting and selling their information;
- categories of third parties to whom we have disclosed or shared their personal information;
- categories of personal information that we have disclosed or shared with a third party for a business purpose; and
- categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

Note, however, that we do not sell personal information to any third party.

Submitting Requests. Requests to exercise the right of deletion, right to a copy or the right to information may be submitted to privacy@banklabs.com. We will respond to verifiable requests received from California consumers as required by law.

Right to Non-Discrimination and Incentives. The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA and imposes requirements on any financial incentives offered to California residents related to their personal information.

Marketing

BankLabs may send you information related to its services, products or events that we believe are of interest to you. If at any point you no longer wish to receive marketing communications from BankLabs you may

- (a) unsubscribe from BankLabs' communications sent by e-mail using a link provided in marketing e-mails sent from BankLabs; or

- (b) contact us to exercise your right to prevent all forms of marketing (both post and e-mail).

Children

Our websites are not intentionally designed for or directed at children under the age of 13. It is our policy never to knowingly collect or maintain information about anyone under the age of 13, except as part of an engagement to provide professional services.

Links

Our websites may contain links to other websites, including those maintained by our affiliates that are governed by other privacy policies that may differ somewhat from this one. Users should review the privacy policy of each website visited before disclosing any personal information. If we provide links to third party websites, such links do not constitute an endorsement, sponsorship, or recommendation by BankLabs of the third parties, their websites or the information contained on those websites. BankLabs is not responsible or liable for your use of such third-party websites. You should review the privacy policies of any websites or applications before submitting personal information.

Changes to this Policy

By using websites of BankLabs and its affiliates, you consent to the collection, use and storage of personal information as described in this Privacy Policy and elsewhere on the websites. We reserve the right to make changes to this Privacy Policy from time to time. We will notify you by posting amendments to the Privacy Policy on this website.

Contact Us

If you have questions or concerns regarding this policy or BankLabs data processing policies, please contact BankLabs at privacy@banklabs.com.