

LOANSTREET LLC

PRIVACY POLICY

Effective Date: April 8, 2016

This Privacy Policy applies to the information LoanStreet LLC collects from you during the course of registering with LoanStreet LLC and during the course of your use of the LoanStreet Sites and LoanStreet Services.

References to capitalized terms used but not defined herein shall have the meaning ascribed to them in the LoanStreet LLC Terms of Use Agreement.

The term "Personal Information" refers to information that personally identifies you as an individual.

Additional privacy and confidentiality requirements may apply to parties using any LoanStreet Site and LoanStreet Service. You should refer to the Terms of Use Agreement and any agreement governing the purchase or sale of a loan, a loan assignment or loan participation for specific information regarding those confidentiality obligations.

LoanStreet LLC is committed to maintaining the integrity and security of your information. LoanStreet LLC wants you to know how LoanStreet LLC protects your information and uses it to operate the LoanStreet Sites and LoanStreet Services.

1. Information
 - a. Registration Information

LoanStreet LLC may collect from you certain institutional information and certain Personal Information, and may request additional institutional information and Personal Information from time to time, in order to register your institution with and prior to allowing your institution to use certain portions of LoanStreet Sites and LoanStreet Services as well as for the continued use of LoanStreet Sites and LoanStreet Services.

LoanStreet LLC may provide your institution with the ability to manage a LoanStreet LLC profile that may be available for viewing by other registered users of LoanStreet Sites and LoanStreet Services. This LoanStreet LLC profile may include certain information regarding your institution, including certain Personal Information, provided by you to LoanStreet LLC for this purpose. This LoanStreet LLC profile may also include various characteristics regarding your institution, including, where applicable, certain aggregated information regarding the amount and performance of the loans, loan participations and loan assignments published for sale or sold by your institution on any LoanStreet Site or through any LoanStreet Service, your interests as it relates to the acquisition of loans, loan participations or loan assignments. LoanStreet LLC may also provide your institution with the ability to share with other registered users information regarding your institution, including your institution's policies and procedures as it relates to your management of loans, loan collections, loan servicing and other matters related to your activity on or through any LoanStreet Site or LoanStreet Service.

b. Usage Information

LoanStreet LLC also collects and maintains “usage information” from and during the course of your institution’s doing business with LoanStreet LLC, including the use of LoanStreet Sites and LoanStreet Services. This information includes, among other things, (i) for purchasers of loans, loan assignments or loan participations: transactions, purchases, transfers, investments, distributions and receipts of proceeds for initial purchases and loan collections over time and the performance of these investments over time, various metrics regarding your institution’s search for loans, loan assignments and loan participations, your interests as they relate to purchases of loans, loan participations or loan assignments and the manner in which your institution manages and sells those investments; and (ii) for sellers of loan, loan assignments or loan participations: transactions, the manner in which your institution sells loans, loan assignments and loan participations, the distribution and receipts of the initial purchase and of loan collections over time, various metrics regarding the loans, loan assignment and loan participations sold and their performance, and the management of these items over time.

Additionally, LoanStreet LLC transmits, and facilitates the transmission of, a number of different communications, including emails, and other notifications between and among (i) (x) purchasers and (y) loan originators in connection with the purchase, sale, distribution and receipt of the initial purchase and of loan collections over time and the management of loans, loan assignments and loan participations and (ii) (x) LoanStreet LLC and (y) you in connection with your institution’s account and doing business with LoanStreet LLC. In order to be effective, these communications, which includes the use of email, and other notifications require the transmission of information regarding these purchases, sales, distributions of initial purchases and loan collections, their management and certain details regarding your institution’s account and, include, among other things, notifying the applicable parties of purchase or sale confirmations, distribution and receipt of the initial purchase of a loan and of loan collections over time, reporting on the performance of loans, loan assignments and loan participations, notifying the applicable parties of their membership as part of a loan syndicate, loan assignment or loan participation, invitations to view loans, request for dataroom access, requests for voting, modification of loan terms, additional discussions in communication forums (described further below), requests to verify bank accounts, and new sub-user accounts, among other matters in the administration and performance of the operations of LoanStreet LLC through any LoanStreet Site or LoanStreet Service.

LoanStreet LLC may, in its sole discretion, modify the content of these emails and notifications, including no longer providing them in their entirety or, alternatively, adding additional communications, notifications and emails.

c. Additional Usage Information

i. Cookies

An internet “cookie” is a small text file created by a web site that stores information on your computer, such as your preferences when visiting that site. Among other matters, LoanStreet LLC uses cookies to enable you to use LoanStreet Sites and LoanStreet Services and is important for ensuring smooth transitions between webpages within and among LoanStreet Sites.

If you choose to block LoanStreet LLC from using cookies in connection with your use of any LoanStreet Site or LoanStreet Service you will adversely affect your ability to use and access certain portions of LoanStreet Sites or use certain LoanStreet Services.

ii. Communication Forums

If you use any bulletin board, blog or chat room on any LoanStreet Site, you should be aware that any information you submit can be read, collected, or used by other users of these forums. LoanStreet LLC is not responsible for the information you choose to submit in these forums.

To request removal of your Personal Information from any forum, please contact us at help@loanstreet.com. LoanStreet LLC will, after reasonable opportunity to act, make commercially reasonable efforts to remove your Personal Information from those forums. In some cases, LoanStreet LLC may not be able to remove your Personal Information and should that occur LoanStreet LLC will make commercially reasonable efforts to advise you promptly of LoanStreet LLC's inability to remove your Personal Information.

d. LoanStreet LLC's Use of Information

LoanStreet LLC requires your institution's information and your Personal Information in order to register your institution with LoanStreet LLC and to enable your institution to use or access certain portions of LoanStreet Sites and LoanStreet Services, including transacting business on any LoanStreet Site or through any LoanStreet Service, to enable communications with you and your institution, to verify your and your institution's identity and to fulfill legal and regulatory requirements. Additionally, LoanStreet LLC requires your institution and Personal Information in order to maintain the LoanStreet Sites and provide the LoanStreet Services.

LoanStreet LLC will not disclose your Personal Information to third parties except as described in LoanStreet LLC's agreements with you or otherwise with your consent.

Examples of when your Personal Information is shared with third parties include your profile on LoanStreet LLC (which is viewable by other registered users of LoanStreet LLC) or when you participate in forum or other discussions on LoanStreet LLC. LoanStreet LLC may disclose your Personal Information from time to time with LoanStreet LLC affiliates, parents and subsidiaries and their employees and agents as part of the operation of its business.

LoanStreet LLC will disclose certain information regarding your institution to third parties, including other registered users of LoanStreet Sites and LoanStreet Services as part of the operations of its business. In particular, certain LoanStreet Sites and LoanStreet Services rely upon and require the disclosure of certain information to other registered users, including, for example, for loan originators, which loans are available for sale on any LoanStreet Site, the portfolio of loans, loan assignments and loan participations sold to a registered user, the distribution and receipt of your loan collections over time, the administration and performance of your loans, loan assignments and loan participations held

by a registered user, and the aggregate historical performance of a lending institution's loans published for sale or sold on any LoanStreet Site or through any LoanStreet Service.

Without your prior approval, LoanStreet LLC will not disclose to third parties or other registered users of LoanStreet LLC information specifically pertaining to the performance of your institution's purchases of loans, loan assignments or loan participation on any LoanStreet Site or through any LoanStreet Service.

LoanStreet LLC may also disclose your institution's information and your Personal Information, if it reasonably believes that it is required by law or necessary to operate LoanStreet LLC's business, including when necessary to: (1) enforce the Terms of Use; (2) protect and defend LoanStreet LLC's rights or property; or (3) comply with a court order, warrant, subpoena or other legal process or other legal or regulatory requirements of any governmental authority. In addition, LoanStreet LLC may use your institution's information and your Personal Information, for internal purposes, such as fraud and theft prevention, error reporting, development and administration of LoanStreet Sites or LoanStreet Services, data analytics, and compliance with LoanStreet LLC's legal obligations, policies and procedures.

2. Privacy Procedures at LoanStreet LLC

a. Limited Access to Your Personal Information

LoanStreet LLC limits access to your Personal Information to (i) LoanStreet LLC employees; and (ii) those agents of LoanStreet LLC who need to know the information to provide you with access to LoanStreet Sites, to enable you to use LoanStreet Services or to run and operate the businesses of LoanStreet LLC, including LoanStreet Sites and LoanStreet Services. We employ several safeguards the purpose of which is to protect your Personal Information.

LoanStreet LLC uses software, systems and procedures in an effort to provide you with a safe and secure environment for conducting business on any LoanStreet Site or LoanStreet Service and protect your Personal Information.

While no security system is absolutely impenetrable, LoanStreet LLC will review, refine and upgrade security technology as new tools, practices, procedures and information becomes available.

b. Your Obligation to Help Protect Your Personal Information

LoanStreet LLC seeks to prevent unauthorized access to your institution's information and your Personal Information. Central to this effort is ensuring that the information LoanStreet LLC has about you and your institution is accurate and current.

You are responsible for ensuring the accuracy of the information collected by LoanStreet LLC about you and your institution. If at any time you discover inaccuracies in LoanStreet LLC's information or if your institution or Personal Information changes, please immediately inform LoanStreet LLC of any inaccuracy or change in your institution's information or Personal Information by, to the extent possible, updating that information through a LoanStreet Site, and if not possible to update through any LoanStreet Site, then by emailing us at help@loan-street.com.

3. Third Party Links & Service Providers

a. Third Party Links on any LoanStreet Site

LoanStreet Sites may contain links to other Internet web sites that were developed, operated, sponsored or maintained by third parties. Third party Internet sites and services accessible through a LoanStreet Site will have their own privacy and data collection practices which are independent from LoanStreet LLC.

LoanStreet LLC has no responsibility or liability for these other Internet web sites or their independent policies or actions.

b. Third Party Service Providers

LoanStreet LLC uses third party service providers to facilitate of the operation of the LoanStreet Sites and LoanStreet Services, including the use of information technology infrastructure for application servers, file storage and database management as well as the distribution of proceeds from the purchase or sale of a loan, loan assignment or loan participation and the distribution of loan collections over time.

LoanStreet LLC may also enter into from time to time joint ventures, distribution agreements and other relationships with third parties which may require the disclosure of certain information regarding your institution, including your Personal Information, as part of these agreements.

To provide you with quality service, LoanStreet LLC may also disclose certain institutional information and Personal Information, to service providers that perform email marketing, promotional and other services on LoanStreet LLC's behalf.

LoanStreet LLC seeks to limit the information provided to these third party service providers to only the information needed to perform the contracted for task.

Please contact help@loan-street.com for a current list of material third party service providers.

4. Mergers or Acquisitions of LoanStreet LLC; Transfer of Information

Your institution's information and your Personal Information may be transferred to a third party as a result of a sale, including a sale of all or substantially all of LoanStreet LLC's assets, acquisition, merger, reorganization or other similar transaction involving LoanStreet LLC. LoanStreet LLC reserves the right to transfer the information to a third party in connection with any such transaction.

LoanStreet LLC may also transfer this information to any parent entity, any wholly-owned subsidiary of LoanStreet LLC or any wholly-owned subsidiary of any parent entity.

5. Supremacy of Terms of Use Agreement

This Privacy Policy does not supersede the Terms of Use Agreement that governs your use of any LoanStreet Site or LoanStreet Service. In the event of any conflict between the Terms of Use Agreement and this Privacy Policy, the Terms of Use Agreement shall control and govern.

6. Changes to this Privacy Policy & Former Registered Users

LoanStreet LLC reserves the right, in its sole discretion, to modify, amend or otherwise change this Privacy Policy from time to time. LoanStreet LLC will advise registered users of changes to this Privacy Policy and the effective date of the changes by posting the revised Privacy Policy to LoanStreet Sites. You agree that posting of a revised Privacy Policy constitutes actual notice to you of the revised policy.

In the event you are no longer a registered user, to the extent LoanStreet LLC retains any of your information, LoanStreet LLC will manage your information in the same manner as currently registered users.