

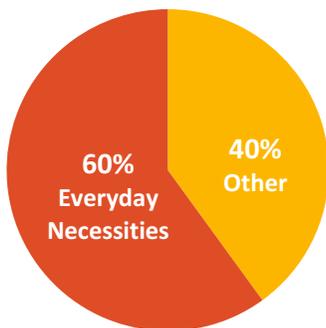
TCF's Overdraft Protection Program



Valuable Service

Many customers who elect to participate in TCF's overdraft program view it as a valuable service that enables them to make purchases for everyday necessities.

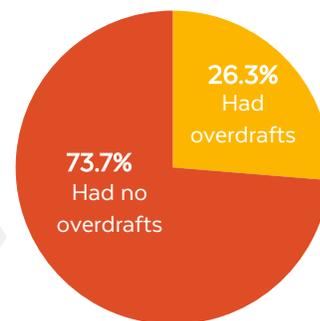
Debit Card Transactions
(2016)



Approximately 60% of all TCF debit card purchases are used for life's necessities such as gasoline, groceries, medicine and utilities.

Most TCF Customers who opt-in use the overdraft service as a free "safety net."

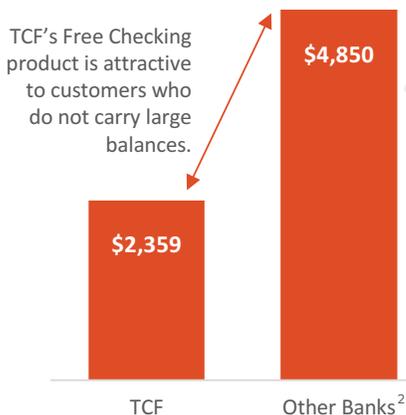
Opt-In Customer Breakdown
(2015)



> 100,000 Times Per Month...

Customers who opt-in can make a debit card purchase that would cause their account to go negative and have that transaction authorized. They do this knowing a pending deposit will restore their account to a positive balance without paying a fee. Alternatively, if they chose to opt-out, the transaction would be declined.

Average Daily Balance ¹

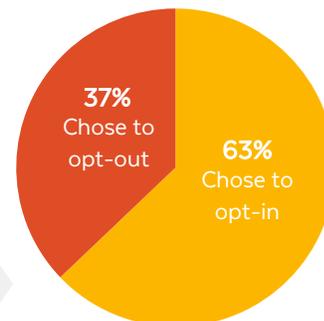


TCF's Free Checking product is attractive to customers who do not carry large balances.

Many customers with lower balances appreciate the predictability that opting into overdraft protection provides them for everyday debit card, ATM and non-recurring ACH transactions.

TCF's online opt-in rate of approximately 60% offers a window into the preferences of TCF's customers when presented the option of choosing TCF's overdraft services without any influence from a TCF employee. The online opt-in rate is similar to the percentage of customers who elected to opt-in following an in-person presentation by a TCF employee.

Online Opt-Out / Opt-In Data
(April 2010 through December 2016)



¹ Customers who only have a debit card
² Weighted average of super-regional banks
 Source: Argus Information and Advisory Services LLC, 2016 Deposit Account Payments Study (on file with TCF).



TCF's Overdraft Protection Program

Multiple Clear Disclosures

At least 20 Times

The number of times a customer is informed that enrollment in overdraft protection is optional and is solely their choice – from the time they open an account to when they incur an overdraft.

TCF OVERDRAFT SERVICE OPT-IN CONFIRMATION

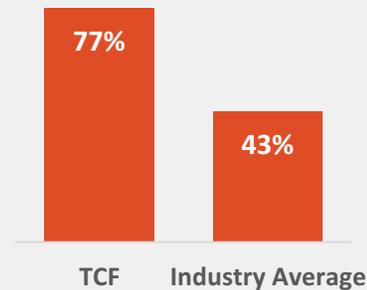
We are confirming that you have elected to consent, or opt-in, to TCF's authorization and payment of overdrafts on ATM and everyday debit card transactions (TCF Overdraft Service). Our standard NSF/Overdraft fees will apply. Under our account agreement with you, we may increase these fees or add to them in the future. We will provide you with advance notice of any increase or addition to these fees.

Minimal Opt-In Complaints And Strong Track Record of Resolution

Only 341 Complaints from More Than 2.6 Million Customers over 6 Years

Number of opt-in related complaints made to TCF from January 2010 through January 2016, including all TCF-specific complaints filed with the CFPB and complaints made directly to TCF relating to opt-in status.

TCF's complaint resolution and customer relief rates significantly exceed industry averages



Responsive to Customers' Needs and Circumstances

\$100 million Overdraft Fees Refunded or Written Off

Voluntary action in response to hardship and other customer requests from 2010 through 2016.



During National Financial Literacy Month, TCF accepted its second consecutive award for Innovation in Financial Education.

TCF has a strong commitment to financial literacy, with free programs over the past three years that have reached

1,000+

High Schools

100,000+

Students

20,000+

Adults