

## CALIFORNIA PRIVACY NOTICE

**Effective Date: January 1, 2020**

*This notice reflects our good faith understanding of the California Consumer Privacy Act (the “CCPA”) and our data practices as of January 1, 2020, but the CCPA’s implementing regulations are not yet final, and there remain differing interpretations of the law. Accordingly, we may update information regarding our data practices and your rights, modify our methods for responding to your requests, and/or supplement our response to your requests, as we continue to develop our compliance program to reflect the evolution of the law and our understanding of how it relates to our data practices.*

This California Privacy Notice (“**Notice**”) applies to “Consumers” as defined by the California Consumer Privacy Act (“CCPA”) as a supplement to Credit Solutions Corp.’s (“**Credit Solutions Corp.**” “**us**” “**we**” “**our**”) other privacy policies or notices. In the event of a conflict between any other privacy notice and this Notice, this Notice will prevail as to California Consumers and their rights under the California law.

This Notice covers our collection, use, disclosure, and sale of California Consumers’ “Personal Information” (“**PI**”) as defined by the CCPA, except to the extent such PI is exempt from the notice obligations of the CCPA for the twelve months preceding the Effective Date. As a debt collector, much of the data we collect and process may not be subject to CCPA Consumer rights. Without limiting the foregoing:

### **I. COLLECTION AND USE OF PERSONAL INFORMATION**

We collect PI about California Consumers, which in the calendar year 2019 included the following:

Category	Example of PI Collected	Source of PI	Purpose	Recipients
Identifiers and Personal Records	Name, postal address, email address, identification numbers.	From the Consumer, Clients, Service Providers.	Account Servicing, Managing Interactions and Transactions, Quality Assurance and Security.	Clients, Service Providers, Credit Reporting Agencies, Employers.
Retail and Financial Information	Account and Routing Numbers, Information relating to payment methods and	From the Consumer, Clients, Credit Reporting Agencies.	Account Servicing, Managing Interactions and Transactions, Quality	Clients, Service Providers, Credit Reporting Agencies.

	processing, transaction information, loan/credit balances.		Assurance and Security.	
Payments, Including On-Line Payments	Account and Routing Numbers, Information relating to payment methods and processing, transaction information, loan/credit balances.	From the Consumer.	Account Servicing, Managing Interactions and Transactions, Quality Assurance and Security.	Clients, Service Providers involved in payment processing only.
Recordings	Identifiers, Financial Information, Professional and Employment Information, Account and Routing Numbers, Information relating to payment methods and processing, transaction information, loan/credit balances.	From the Consumer.	Account Servicing, Managing Interactions and Transactions, Quality Assurance and Security.	Clients, Service Providers.
Professional and Employment Information	Information concerning Consumer's job and employment.	From the Consumer, Clients, Credit Reporting Agencies, Employers.	Account Servicing.	Clients, Service Providers, Employers.

In addition, we may collect, use, and disclose your PI as required or permitted by applicable law.

We may share your PI with our Service Providers, including creditors, credit reporting agencies, account servicers, payment processors and other categories of recipients as described in the table above, for the same purposes as identified in the chart. Subject to the CCPA's restrictions and obligations, our Service Providers may also use your PI for some or all of the above-listed business purposes. Our Service Providers may themselves engage service providers or subcontractors to enable them to perform services for us.

We do not believe we have sold (as the term "sale" is defined by the CCPA) Consumer PI in 2019. As the law evolves we may revisit this conclusion and, if applicable, revise this Notice.

## **II. CALIFORNIA PRIVACY RIGHTS**

Under the CCPA, California Consumers have certain rights which they may exercise independently or through an authorized agent. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process, which will depend on the nature of the request and the PI requested and will be further explained in response to a request. We will not fulfill your CCPA request unless you have provided sufficient information for us to be satisfied that you are the Consumer about whom we collect the applicable PI. Please promptly respond to any follow-up inquiries so that we may verify your identity. If you request that we provide you with specific pieces of information about you, or that we delete sensitive PI, we may apply heightened verification standards than what we would apply to other types of requests. Authorized agents who meet the agency requirements of the CCPA may submit requests on behalf of Consumers, which will also be subject to a verification process.

We will use PI provided in your request only to verify your identity or authority to make the request and as necessary to track and document requests and responses, unless you also provided the PI to us for another purpose.

We will make commercially reasonable efforts to identify Consumer PI that we collect, use, store, disclose, or otherwise process and to respond to your California Consumer privacy rights requests. In some cases, particularly with voluminous and/or typically irrelevant data, we may provide you with a summary of your PI and give you the opportunity to elect whether you want us to provide the entire data set. Alternatively, we may direct you on how to access and copy responsive PI yourself. We may charge a reasonable fee or refuse to act upon a request if the request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee, or that we may decline to comply with the request, we will give you notice explaining why we made that decision. In the case of a fee, we will provide a cost estimate and the opportunity to accept such fees before charging you for responding to your request.

We may collect, use, and disclose your PI as required or permitted by applicable law, and this may override your CCPA rights. Please also note we are not obligated to comply with Consumer requests to the extent that doing so would infringe on our, or any other person's or party's rights, or conflict with applicable law.

Your California Consumer privacy rights are described below. To make a request, please see the “Contact Us” at the end of this Notice.

## **Disclosure Rights**

### **i. Information Rights**

You have the right to send us a request, no more than twice in a twelve-month period, for any of the following for the period that is twelve months prior to the request date:

1. The categories of PI we have collected about you.
2. The categories of sources from which we collected your PI.
3. The business or commercial purposes for our collecting or selling your PI.
4. The categories of third parties to whom we have shared your PI.
5. The specific pieces of PI we have collected about you.
6. A list of the categories of PI disclosed for a business purpose in the prior twelve months, or that no disclosure occurred.
7. A list of the categories of PI sold about you in the prior twelve months, or that no sale occurred. If we sold your PI, we will explain:
  1. The categories of your PI we have sold.
  2. The categories of third parties to which we sold PI, by categories of PI sold for each third party.

For your specific pieces of information, as required by the CCPA, we will apply the heightened verification standards set forth in subsection (ii) below and may exclude that information if you cannot meet those standards. If we cannot verify you to a reasonable degree of certainty, we will not deliver the category information either but will refer you to the disclosures in Section I above.

Please note that PI is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back twelve months prior to the request.

### **ii. Obtaining Copies of PI**

You have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your PI that we have collected in the period that is twelve months prior to the request date and are maintaining. In order to protect the privacy and data security of Consumers, we will require a high degree of certainty that we have verified that a requester is the requesting Consumer or the Consumer’s authorized agent. In addition, consistent with the CCPA and our interest in the security of your PI, we will not deliver to you your social security number, driver’s license number, or other government-issued identification number, financial account number, any health or medical identification number, an account password, or security questions or answers in response to a CCPA request.

Please note that PI is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back twelve months prior to the request.

### **“Do Not Sell” Rights**

We may disclose your PI for the following purposes, which are not a sale: (i) if you direct us to share PI; (ii) to comply with your requests under the CCPA; and (iv) as otherwise required or permitted by applicable law.

We do not believe that we sell California Consumer PI as defined under the CCPA. There is not yet an industry consensus, but we do not believe that the collection of data by third-party cookies and other technologies on our website and online services is a sale of your personal information by us. As the law and an industry consensus may develop regarding cookies and the CCPA, we will reevaluate our approach to cookies and may change the way we treat cookies and other online tracking technologies.

### **Deletion Rights**

You may request that we delete your PI that we have collected directly from you. Under the CCPA, we may decline to delete your PI under certain circumstances, for example, if we need the PI to complete transactions or provide services you have requested or that are reasonably anticipated, for security purposes, for internal business purposes (including maintaining business records), to comply with law, or to exercise or defend legal claims. Note also that we are not required to delete your PI that we did not collect directly from you. We require a reasonable or high degree of certainty that the requester is the Consumer for which a deletion request is applicable, depending on the sensitivity of the PI.

### **Non-Discrimination**

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

## **CONTACT US**

By Phone: (800) 250-8877

By Email: [customer.service@creditsolutionscorp.com](mailto:customer.service@creditsolutionscorp.com)

By Mail: 404 Camino Del Rio S. #400 San Diego. CA 92108

When communicating with us, please provide us with your name, e-mail address, phone number, account number and the nature of your inquiry.