

FOR CALIFORNIA CONSUMERS– CA SUPPLEMENT

Effective Date: 10/18/2022

FOR CALIFORNIA RESIDENTS

Under the California Consumer Privacy Act of 2018 (“CCPA”), all visitors, users, and others who reside in the State of California (“CA Consumers/you/your”) are provided additional rights regarding their personal information, including sensitive information, as defined by the CCPA, and further detailed below (collectively referred to “Personal Information”).

This Privacy Notice for California Residents (“CA Supplement”) applies to all CA Consumers using the Portal and describes the rights granted to CA Consumer(s) under the CCPA. The continued use of the Portal(s) by any CA Consumer demonstrates the agreement of the CA Consumer to the terms contained in this CA Supplement. This CA Supplement is intended to supplement other policies included on the Portal, including, but not limited to the Terms of Use and Privacy Policy (“Policies”). In the event of any conflict between the Policies and this CA Supplement, the CA Supplement shall control. Any waivers referenced within any Policies shall not apply to the rights set forth herein.

If you would like to receive this notice in a different format to accommodate a disability, please contact correspondence@conserve-arm.com.

If you are a CA Consumer, when you use the Portal, you consent to our collection, use, and disclosure of Personal Information as described below. If you do not agree with this CA Supplement, your choice is not to use the Portal. This CA Supplement may change from time to time. The use of this CA Supplement after we make changes is deemed to be acceptance of those changes, so please check the CA Supplement periodically for updates.

COOKIES AND TRACKING

We do not track or plant cookies. As such, we will not honor or respond to any “do not track” request because collected Personal Information is never shared with unauthorized third parties. We do not allow third-party behavioral tracking.

CALIFORNIA RESIDENT RIGHTS AND CHOICES

Please note that our office does not sell any of your Personal Information. We also do not offer any financial incentive programs as part of our Services.

You have the right under the CCPA, and certain other privacy and data protection laws, as applicable, to:

- To request the disclosure of certain information about our collection and use of the Personal Information over the past twelve (12) months. Once we receive and confirm your verifiable CA Consumer request, in accordance with the CCPA ("Verified Request"), we will disclose to you:
 - what categories of your Personal Information are being collected by us, and if any of the categories have been disclosed;
 - the purpose of gathering or using your Personal Information;
 - if any of your Personal Information is shared;
 - the length of time we shall retain each category of your Personal Information, or the criteria used to determine that period of time each category is retained;
 - the categories of sources from which your Personal Information is collected;
 - the categories of third parties to whom your Personal Information is shared or disclosed;
 - the specific pieces of Personal Information we have collected about you; and
 - the length of time we shall retain each category of your Personal Information, or the criteria used to determine that period of time each category is retained ("Disclosure Data").
- To request we correct any inaccurate Personal Information, and that we correct the error, as directed by you;
- To opt-out of the sharing of your Personal Information;
- To receive equal service and pricing, even if you exercise your rights under the CCPA;
- To access Personal Information, including, the Disclosure Data, as applicable;
- To delete any of your Personal Information that we collected from you and retained;
- Limit the use of your sensitive Personal Information to a use what is necessary to perform the Services;
- To sue for data breach; and
- To obtain information of any financial incentives, for the collection of Personal Information, sale of Personal Information, or the deletion of Personal Information, and to enter any financial incentive program if you give us a prior opt-in consent to any such program.

Please note that we are not required to:

- Retain any Personal Information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
- Re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered Personal Information; or
- Provide the Personal Information to you more than twice in a 12-month period.

MAKING YOUR REQUEST

If you, or any authorized agent, wish to exercise your rights under the CCPA, please contact us by using any of the methods set forth below. Authorized agents should submit a written authorization form signed by the CA Consumer with any request.

Please note that you, or an authorized agent on your behalf, may only make an access rights request twice within a 12-month period.

Your “verifiable consumer request” for data access and information deletion must include (this is not required for opt-out requests):

- Enough information to match your identifying information to our personal information (e.g., your full name, mailing address, date of birth, email address, last four digits of your social security number and/or account or other reference number), which should include at least two personal data points that we have in our records for general requests and/or deletions; or
- Enough information to match your identifying information to our personal information (e.g. your full name, mailing address, date of birth, email address, last four digits of your social security number and/or account or other reference number), which should include at least *three* personal data points that we have in our records *and* a signed declaration under penalty of perjury that you are the CA Consumer whose Personal Information is the subject of the request for requests seeking access to specific pieces of Personal Information or deletion of sensitive Personal Information. Please note your data rights request may be manually or electronically signed by any process that satisfies the California Uniform Electronic Transactions Act. As a result, a signed declaration can be provided electronically, if it includes the statement: Under penalty of perjury, I certify that the information in this declaration is true, accurate and complete and that it is my intention that this electronic request [e.g., email, interactive webform] to exercise a data right under the California Consumer Privacy Act shall carry the same force and effect as if I had manually signed this request.

We are not obligated to make a data access or information disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person’s behalf.

Any Personal Information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

Response Timing and Format

We will acknowledge receipt of your request within 10 business days. We endeavor to respond to a verifiable CA Consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable CA Consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable CA Consumer request, unless it is determined to be manifestly unfounded, excessive, or repetitive. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate for the reasonable fee before completing your request.

Denials for Requests to Delete

Under the CCPA, we may deny your request for deletion if one of the following reasons applies:

- Complete the transaction for which the Personal Information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent;
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with a legal obligation; or

- Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the Personal Information.

If we cannot honor your request to delete, we will notify you of the information that cannot be deleted and include the reason why.

HOW TO CONTACT US
Call us at: (844) 497-6383
Email us at: CCPA@conserve-arm.com
Write us at: P.O. Box 7, Fairport, NY 14450
You may submit a request for more information about your Personal Information by clicking the link to Request information about what we collect, share, and disclose .
You may submit a request for deletion or correction of your Personal Information by clicking the link to Request a deletion or correction of my Personal Information .
You may access your Account information via the secure login system on the Portal, where you may be able to update certain Personal Information.

WHAT WE COLLECT

We have collected and our Portal collects and/or has collected non-public “Personal Information” described below, over the last twelve (12) months, that identifies, relates to, describes, references, and is capable of being associated with you, which may include one or more of the categories listed below.

We will not collect any additional categories of information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated CA Consumer information.
- Information excluded from the CCPA’s scope, such as:

- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

PERSONAL INFORMATION	
Categories	Examples
Identifiers	Name, alias, postal address, email address, account name, unique personal identifier, demographic information, telephone numbers, online identifier, internet protocol address, credit report data, or other similar identifiers, including those received by skip-tracing sources, including sensitive personal information listed below.
Client and Account records	<p>Any material, regardless of form, on which information that identifies, relates to, describes, or is capable of being associated with, a particular individual, is recorded, such as employment information, bank account data, credit card information, current or past job history, or other information contained in the records related to any Account that we may hold.</p> <p>Account Registration data, including email address, username, and password upon creation of an Account login on the Payment Portal, Forms Portal and/or Mobile App.</p> <p>Other information associated with an account may include tax returns, financial statements, loan and credit applications, signature cards or other account documentation containing the consumer's signature, including electronic signatures.</p>
Characteristics of protected classifications	Gender, age, marital status, veteran or military status, and/or data of minors.
Internet activity	Browsing or search history, information about your interaction with the Payment Portal, Forms Portal and/or Mobile App, such as internet protocol ("IP") addresses or other electronic markers for security monitoring purposes.

Audio, electronic, visual, thermal, and olfactory information	Call recordings
Employment-related information	Information gathered about the Consumer's employer for purposes of contact, associated with the ability to provide Services, and provided to facilitate certain Services, Account information that includes professional or employment-related information, places of employment
Education information	As defined in the Family Educational Rights and Privacy Act, non-public educational records such as student identification codes, class registration agreements, grade reports, and student financial and financial aid information
Inferences drawn from any of these pieces of information identified in creating any profile about a Consumer	Consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
Sensitive personal information	<p>Account information, including, but not limited to personal information that reveals a Consumer's social security number, driver's license, state identification card, or passport number;</p> <p>account log-in information, financial account, debit card and/or credit card numbers, bank account numbers and routing numbers and associated check or bank draft information;</p> <p>racial or ethnic origin, contents of Consumer's mail or email, unless the business is the intended recipient of the communication.</p>

USE OF INFORMATION

Please note that we DO NOT sell your Personal Information

We may use your Personal Information for one or more of the following business purposes:
Utilizing your Personal Information, as necessary, to provide collection or billing services on behalf of facilities, businesses, and other entities that we have contracts with ("Client(s)") for account(s) that

have been placed with our office for collection, whether considered in default ("Account(s)") and the services associated with those agreements ("Services")
Performing Services on behalf of our Clients, including debt collection, maintaining or servicing Accounts, providing customer service, processing or fulfilling transactions concerning accounts, verifying or updating information, processing payments, providing analytic services, or providing similar services on behalf of our Clients
Addressing any fraudulent activity or allegations of identity theft related to an Account
Complying with any legal obligation associated with an Account
Lawful, internal uses related to the Services, such as gathering Personal Information to obtain payment on Accounts, submitting any legally allowed information related to submitting Account payment information to a consumer reporting agency
Fulfilling or meeting the reason you provided the Personal Information
Providing, supporting, personalizing, and developing our Portal and Services
Creating, maintaining, customizing, and/or securing any password protected access areas
Processing your requests, purchases, transactions, and payments, and preventing transactional fraud
Providing support and response to any of your inquiries, including any investigation necessary to address your concerns, and monitor, and improve our responses
Personalizing the Portal's experience, delivering content, product, and service offerings relevant to your interests
Responding to law enforcement requests and as required by applicable law, court order, or governmental regulations
To ensure appropriate right party contact and verification purposes in performing services on behalf of our Clients
To fulfill or meet the reason you provided the information. For example, if you share your Personal Information to make a payment, we will use that information to process your payment

To provide you with information, products, or services that you request from us or to respond to inquiries received from you on your behalf regarding the services provided on behalf of our Clients
Monitoring or auditing activities related to a current interaction with the CA Consumer and concurrent transactions
Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
Debugging to identify and repair errors that impair existing intended functionality
Short-term, transient use, provided the Personal Information is not disclosed to another third party and is not used to build a profile about a CA Consumer or otherwise alter an individual consumer's experience outside the current interaction
Undertaking internal research for technological development and demonstration
Undertaking activities to implement, operationalize, improve, upgrade, or enhance the services performed on behalf of our clients and consumers (including CA Consumers), as well as the tools used to provide those services, including analytics and other information analysis tools
To respond to law enforcement or other governmental requests and as required by applicable law, court order, or governmental contracts or regulations
As necessary or appropriate to protect the rights, property, or safety of CA Consumers, us, our clients, or others
As described to you when collecting your Personal Information, or as otherwise set forth in the CCPA

WHERE WE GET OUR INFORMATION

The sources that our Personal Information comes from include:
Clients
Service Providers (e.g., letter vendors, skip-tracing vendors, payment processing vendors, call analytics vendor and/or electronic signature service providers)

Directly from a third-party pursuant to 16 U.S.C. §1692b (e.g., friends, neighbors, relatives, and/or employers)
Personal Information received from the Portal, whether on a computer or mobile application
Email, text and other electronic messages between a CA Consumer and us, related to the Services
Personal Information orally received from a CA Consumer during a telephone call related to the Services
Written correspondence sent to our office or the Client regarding an Account
Directly from CA Consumers, including Personal Information that CA Consumers input into the Portal, to utilize the Services
Pieces of information from limited sources, including data received from: the Client upon placement of a CA Consumer's Account; the Client to supplement Account information
Publicly accessible sources (e.g., property records, social media, or court records)
From a third party with your consent (e.g., your authorized representative and/or attorney)

WHO WE SHARE OR DISCLOSE PERSONAL INFORMATION TO

We may share or disclose the Personal Information we collect about CA Consumers as described herein, or otherwise disclosed to you at the time the Personal Information is collected, including with:
Creditors to whom we provide our Services and/or their authorized agents or subcontractors
Consumer reporting agencies
Providers we use to help deliver our Services, such as letter vendors, skip-trace vendors, applications and website vendors, payment service providers, monitoring and auditing service providers, warehouses, and delivery companies
Legal authorities, as required by law
Third parties, as requested and authorized by CA Consumers

Third parties, allowed by law, such as spouses, legal representatives, and/or attorneys
Other third parties, authorized by law, that we use to help us run our business, such as legal, tax, banking, and other service professionals, insurers, brokers, auditors, and state and federal regulators;

EQUAL SERVICING

CA Consumers will not receive any variation in the service or pricing of the Services, or your Account, because of you, exercising of your rights under the CCPA.

We will not discriminate against you for exercising any of your CCPA rights, which ensures that we will not:

- Deny you any access to Services;
- Charge you different prices or rates for Services, including through granting discounts or other benefits, or imposing penalties (any offers or settlements that may be presented are granted by the Clients in connection with our contractual agreements with them and do not correspond in any way to the rights granted under the CCPA);
- Provide you a different level or quality of Services; or
- Suggest that you may receive a different price or rate for Services, or a different level or quality of services.

WE DO NOT PROVIDE ANY FINANCIAL INCENTIVE PROGRAMS FOR THE COLLECTION, SALE, REQUEST FOR DELETION OF ANY PERSONAL INFORMATION, OR OTHER UTILIZATION OF THE RIGHTS GRANTED UNDER THE CCPA.

Contacts for More Information

For Fiscal Service Accounts: Joe Sadowski at 888-889-2406

For IRS Accounts: Joe Sadowski at 844-421-1088

For All Other Accounts: Chris Gent at 866-622-9867

Changes to our CA Supplement

We reserve the right to amend this CA Supplement at our discretion and at any time. When we make changes to this privacy policy, a notice will be posted on our website homepage at www.conserve-arm.com.

