

Universal Credit Services, Inc.
Privacy Policy
Last Updated: July 1, 2020

I. Who are We?

Universal Credit Services, Inc. (the “Company” or “UCS”), headquartered in Hartland, Michigan, U.S.A., provides accounts receivable management services for a variety of commercial and consumer market segments.

If you have any questions or comments about Company’s Privacy Policy or our practices, or if you would like to correct, complete, or supplement any of your information we maintain, please contact us as follows:

Universal Credit Services, Inc
Attn: Compliance Officer
P.O. Box 133
Hartland, MI 48353
(800) 931-3711
compliance@ucscollections.com

II. Who and What is Covered by this Privacy Policy?

This Privacy Policy describes the Company’s policies and practices regarding its collection, use, maintenance, and disclosure of your personal data, and sets forth your privacy rights. This Privacy Policy applies both to the Company’s online information gathering and dissemination practices for Company’s web applications including this website (the “Site”), and information collected or received offline, whether directly from you or from other sources.

If you have arrived at this Privacy Policy by clicking through a link on our Site, or by searching for or clicking on a link directing you to any page of our Site, then this Privacy Policy applies to you. When you use the Site, you consent to the use of your information in the manner specified in this Privacy Policy. This policy may change periodically, as we undertake new personal data practices or adopt new privacy policies, so please check back from time to time for updates to the policy posted here. Updates become effective immediately upon posting unless otherwise stated. By your continued use of the Site, you consent to the terms of the most recently revised and posted policy.

Use of our Site is strictly limited to persons who are of legal age in the jurisdictions in which they reside. You must be at least eighteen (18) years of age to use our Site. If you are not at

least 18 years of age, please do not use or provide any information through this Site. Please also review our [Terms of Use](#) governing the use of this site.

III. Other Websites/Third Party Links

You may find links to other, third party websites on UCS' Site. This Privacy Policy does not apply to any website owned and/or operated by or on behalf of any other entity, even if our Site posts a link to those other websites and you click through from our Site. We do not control the content or links that appear on these third party sites, and are not responsible or liable for the practices employed by third party websites linked to or from our Site. Those websites have separate and independent privacy policies. If you visit and/or disclose information through other sites, you are subject to the privacy policies, customer service policies, and practices of those websites. Browsing and interaction on any other website is subject to that website's own terms and policies.

IV. What Personal Information Does The Company Collect, From Where, And Why?

The following is a description of: (i) the categories of personal information the Company may have collected in the preceding 12 months; (ii) the sources from which we may have collected it; and (iii) the business purposes for which we may have collected it. We do not knowingly solicit, collect, or receive information from or about minors under the age of 18 or from persons residing outside of the U.S.A., through the Site or otherwise.

A. Information You Provide Directly

You may choose to voluntarily submit or disclose Personal Information to us (e.g. name, address, email address, telephone number, date of birth, social security number, account information, information provided when negotiating and/or making a payment or setting up a payment plan, including card payment and checking account information needed to process your payment, attorney or court information, bankruptcy information, etc.). That information – whether submitted or disclosed to us through the Site, by mail, e-mail, SMS text, telephone, or other channel, and whether the purpose for your submission is to inquire about or discuss your account or our services or authenticate your identity – is governed by this Privacy Policy.

If you initiate contact or correspond with us orally or in writing, we may keep a record of your contact information and correspondence and we reserve the right to use your contact information, and any other information that you provide to us in your message, to respond thereto, optimize customer service, or attempt to resolve your request or inquiry. Thus, we may use the information you provide to further correspond with you or to accept payment or otherwise manage your account.

If you wish to change or correct any information voluntarily submitted to us, please do so by contacting us in the manner described above.

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For consumer accounts that we service, please note that communications between us are with a debt collector, in an attempt to collect a debt. Any information obtained will be used for that purpose.

B. Information From Third Parties Acting On Your Behalf.

The Company may receive and maintain Personal Information (*e.g.*, name, address, email address, telephone number, date of birth, social security number, account information, financial information, attorney information, court records, etc.) contained in communications with someone other than you, such as your spouse, power of attorney, attorney, or other authorized representative, in connection with the servicing or management of your account.

C. Information We Receive From Our Clients.

We receive and maintain Personal Information contained in the accounts receivable within the portfolios that we service for our clients. This information may include: name, physical address, email address, telephone number, date of birth, social security number, information contained on credit applications, the original creditor's and our client's account number, the identity of the original and current creditor, employment information, court records, the account balance, payment history and the last date a payment was received on an account, etc. We use this information in connection with the collection and recovery of those accounts receivable and to fulfill our responsibilities to our clients.

D. Information We Receive From Our Service Providers.

The Company may receive and maintain Personal Information from our Service Providers. Service Providers are persons or entities that we contract with to provide a material service in connection with account management and recovery. This may include, for example, location service providers, and data service providers (such as those that scrub accounts). Information that we typically may receive includes updated contact information, bankruptcy activity, military status, death or probate status, etc.

E. Information We Receive From Credit Reporting Bureaus.

The Company may receive and maintain Personal Information provided by one or more of the major Credit Reporting Bureaus. We use this information to seek the collection and recovery of accounts receivable and to fulfill our responsibilities to our clients. This information and the consumer reporting agencies are covered by the federal Fair Credit Reporting Act.

F. Information Received in Connection with Potential Employment.

Company receives Personal Information about potential candidates for employment with UCS, including any resume or application information provided from an applicant, recruiter, or external job service/application website. We use this information to evaluate your candidacy and/or contact you in connection with potential employment.

G. Information Automatically Collected By Your Use Of This Site.

You may use this Site without disclosing to us any personally identifiable information. We do not automatically collect any personally identifiable information from you (e.g., name, address, telephone number, email address, social security number, account numbers, or financial information) when you use the Site. The Site can only collect such information if it is affirmatively provided by you.

Like most websites, however, the Site automatically collects certain non-personally identifiable information during a user's visit. That information may include the internet protocol (IP) address of your device, the location where the device is accessing the internet, browser type and language, internet service provider, type of computer/operating system, date/time stamps, user interface interaction data (e.g., mouse clicks or navigation through the Site), and other information about the usage of the Site, including a history of pages viewed and or uniform resource locator (URL) information (showing where you came from or where you go to next). We use this information to improve the Site's design, estimate user volume and usage patterns, speed up searches, and improve the user experience. We may also use this information to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

More specifically:

I. IP Address

Each time a user visits the Site, we may automatically collect an internet protocol (IP) address and the web page from which the user was directed to the Site. In order to administer and optimize the Site and to diagnose and resolve potential

issues or security threats to our Site or to the Company, we may use an IP address to help identify users and to gather broad demographic information about them.

II. Cookies, Pixel Tags, And Web Beacons

Cookies are small files that a site or its service provider transfers to a user's device through the web browser (if you allow) that enables the site's or service provider's systems to recognize the browser and capture and remember certain information. We use cookies to optimize Site functionality and improve a user's experience while navigating through the Site. Most or all browsers permit you to disable or reject cookies. You can do this by adjusting your preferences in the browser.

Our Site may incorporate "pixel tags," "web beacons," or similar tracking technologies (collectively, "pixel tags") that track the actions of Site users. Pixel tags are used to collect information, such as the internet service provider, IP address, the type of browser software and operating system being used, the date and time the Site is accessed, the website address, if any, from which a user linked directly to the Site and/or the website address, if any, to which the user travels from the Site and other similar traffic-related information.

We may aggregate information collected from Site visits by various users to help us improve the Site and the services that we provide through the Site.

III. Do Not Track

Our Site tracks when visitors enter through a marketing landing page. The Site also keeps a record of third-party websites accessed when a user is on our Site and clicks on a hyperlink. But we do not track users to subsequent sites and do not serve targeted advertising to them.

IV. Analytics Information

Web servers for the Site may gather anonymous navigational information about where visitors go on our Site and information about the technical efficiencies of our Site and services. Anonymous information does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples of anonymous information may include certain information about the internet browser, domain type, service provider and IP address information collected through tracking technologies and aggregated or de-identified data. We use anonymous analytics information to operate, maintain, and provide to you the features and functionality of the Site, improve our services, analyze trends and administer our web applications.

V. What Personal Information Do We Share With Others?

A. We Do Not Sell Personal Information To Third Parties For Their Own Use.

The Company does not sell your Personal Information to third-parties for their own use and does not allow Company's service providers to sell or use Personal Information for their own purposes. Except as may be described in this Privacy Policy, we also do not disclose to third-parties information about your visits to our Site. Accordingly, there have been no sales of non-public Personal Information to Third-Parties for their own use or further disclosure in the past twelve (12) months. The Company does not knowingly sell non-public Personal Information of minors under 16 years of age.

B. Sharing Information With Our Service Providers.

We may share your Personal Information with other persons or entities that we contract with to provide a material service, referred to as Service Providers. Our Service Providers include location service providers, letter vendors or other communications/delivery service providers, data scrubbers, card-issuing banks or third-party payment processors to complete authorized payments, data security providers, and technological support companies. In connection with providing these business services to the Company, one or more of our Service Providers may have access to identifying information, such as your name, contact information, date of birth, social security number, and account information. We restrict our Service Providers from accessing or using your Personal Information for any purpose other than as reasonably necessary to perform a business purpose that we authorize by contract, and your Personal Information will not be further used by our Service Providers or further disclosed by them to any Third Party.

C. Sharing Information With Clients Pursuant To A Written Contract Through Which We Act As a Service Provider.

We may share your Personal Information with our clients, typically creditors and/or account receivable portfolio owners or managers, that engage us as a Service Provider through a written contract and direct us to gather and/or provide Personal Information in order to fulfill our contract responsibilities. This may include information we have related to your account, such as: name, contact information, date of birth, social security number, account status (settled, balance, litigation, court records, bankruptcy, probate/deceased, active military, etc.), payment information, communications with you, account notes, etc. We share this information in connection with the collection and recovery of those accounts receivable, to satisfy audit rights of our clients, and to fulfill our responsibilities to our clients.

D. Reporting to Consumer Credit Agencies.

Company may provide reports to the three major Consumer Credit Agencies containing Personal Information about the status and current balance of active consumer debt accounts that it is servicing for clients. This information and the consumer reporting agencies are covered by the federal Fair Credit Reporting Act.

E. Sharing Personal Information At Your Direction.

We may share your Personal Information with third parties to whom you or your agents authorize us in advance to intentionally disclose to or allow to use your Personal Information in connection with the services that we provide.

F. Sale Of Our Company Or Company Assets.

In the event of a sale, assignment, liquidation, or transfer of our assets or of any portion of our business, we reserve the right to transfer any and all information that we collect to unaffiliated third-parties in connection with that event.

G. Monitoring, Law Enforcement And Legal Requests.

Company may be required by law enforcement, federal or regulatory entities, or judicial authorities to provide your Personal Information, such as in response to an audit, investigation, or subpoena. Company will only disclose information as legally required or necessary to demonstrate compliance with the law. The Company has no obligation to monitor the Site or the use of the Site or to retain the content of any user session. However, we reserve the right, at all times, to monitor, review, retain and/or disclose any information, as necessary and to the extent possible, to satisfy (and demonstrate our compliance with) any applicable law regulation, legal process or governmental request or to cooperate with law enforcement and other authorities in investigating a claim of illegal activity. We may use IP addresses, if available, to identify a user when we feel it is necessary to protect the Site, our service, clients, potential clients or others.

H. Our Internal Use And Research

The Company reserves the full and unrestricted right to use and disclose de-identified information; anonymized information; aggregated information; or publicly available information that has not been combined with nonpublic Personal Information for purposes including, but not limited to, our own internal use, data mining, analytics, and research.

VI. How Long Do We Retain Personal Information?

We are required to retain certain data, including in some cases personal information, for specific periods of time in order to fulfill the contractual requirements of our clients and to complete the services for which we were hired to perform, to comply with our internal policies and procedures, and/or to comply with applicable law.

VII. How Do We Protect Your Personal Information?

The Company is committed to protecting your privacy. We take data security very seriously, because our reputation and livelihood rely on it. Company takes reasonable security measures and seeks to implement the best practices and procedures in data collection, storage, processing and security, to protect personal information from loss, misuse, unauthorized access, disclosure, alteration or destruction. We maintain physical, electronic and procedural safeguards designed to protect against the unauthorized disclosure of Personal Information, and Personal Information is disposed of properly and securely utilizing industry standards. Our data security policies and practices are periodically reviewed and modified as necessary, and subject to third party assessments annually.

****THE INFORMATION BELOW APPLIES TO CALIFORNIA RESIDENTS****

VIII. Rights Under The California Consumer Privacy Act.

A. The CCPA And Personal Information.

The California Consumer Privacy Act (“CCPA”), effective January 1, 2020, as clarified by the Regulations issued by the California Attorney General, grants privacy rights to California consumers in connection with their Personal Information.

Personal Information or “PI” is “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” PI, as defined in the CCPA, does not include personal information that is already subject to sector-specific privacy laws, including the Gramm-Leach-Bliley Act (GLBA) or the Health Insurance Portability and Accountability Act of 1996 (*HIPAA*), a federal law that imposes requirements on financial institutions to protect consumer data.

A consumer has rights regarding his/her PI, including:

- A right to know what PI is collected, used, shared or sold by the business;
- A right to access PI collected and retained by the business;

- A right to require businesses and, by extension, their service providers, to delete PI, subject to certain exceptions;
- A right to opt-out of the business' sale of PI; and
- A right to non-discrimination in terms of pricing or service for choosing to exercise a privacy right under the CCPA.

B.

A business subject to the CCPA must, at or before the point of collection of PI, inform a consumer as to the categories to be collected and the purposes for which it shall be used.

C. Consumer Right To Know.

A covered business must disclose in its privacy policy the PI it has collected, sold, or disclosed for a business purpose in the past 12 months.

A business must disclose the following in response to a verifiable request to know:

- The categories of PI the business has collected about the consumer;
- The categories of sources from which that PI was collected;
- The business or commercial purpose for collecting or selling PI;
- The categories of third parties with which the business shares PI;
- The categories of PI the business sold and categories of third parties to which it was sold;
- The categories of PI the business disclosed for a business purpose and associated categories of third parties to whom those categories were disclosed; and
- If requested, the specific pieces of PI the business has collected.

D. Consumer Right To Delete.

A California consumer has the right to request that a covered business delete his/her PI, subject to certain exceptions. Once a request is reasonably verified by the business, the PI requested to be deleted must be removed from the records held by that business and the business must direct its Service Providers with whom the information was shared to also delete the information, unless it is subject to an exception.

A request to delete may be denied if retaining the information is necessary to:

1. Complete the transaction for which it collected the PI, provide a good or service requested by the consumer, take action reasonably anticipated within the context of the ongoing business relationship with the consumer, or otherwise perform a contract with the consumer.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. 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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with the business.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of the information that are compatible with the context in which the consumer provided it.

E. Consumer Right To Non-Discrimination.

A business must not discriminate against a consumer who exercises CCPA rights. A business may charge different prices or provide a different quality of goods or services, but only if the difference is reasonably related to the value provided to the consumer by the consumer's data. A business may offer financial incentives to a consumer for the collection, sale, or deletion of personal information on a prior, opt-in consent basis.

F. Consumer Right To Opt-Out.

A business that sells PI to third parties must provide notice to consumers, clearly inform them of the right to opt out of the sale, and provide a "Do Not Sell My Personal Information" link on its website that enables the consumer to opt out of future sales.

A business is prohibited from selling the PI of a consumer the business knows is less than 16 years of age, unless (for a child between 13 and 16 years of age) the child has affirmatively authorized the sale or (for a child less than 13 years of age) the child's parent or guardian has affirmatively authorized the sale.

G. Privacy Policy Requirements.

A business must include the following in its privacy policy, to be updated every 12 months:

- A description of consumer CCPA rights, including the right to opt out of the sale of PI and a separate link to a "Do Not Sell My Personal Information" internet webpage if the business sells PI;
- The method(s) by which a CCPA request can be submitted; and

- A list of the categories of PI the business has collected, sold, or disclosed for a business purpose in the preceding 12 months.

IX. How Do I Exercise My CCPA Rights?

A. Instructions For Submitting A CCPA Consumer Rights Request To Us

If you are a California resident and wish to submit a CCPA Request to the Company, you may use one of the following methods:

Mail:

Compliance Officer
Universal Credit Services, Inc
P.O. Box 133
Hartland, MI
48353

Call us, Toll Free, at (800) 931-3711

E-mail us at compliance@ucscollections.com

Please be advised that we are only required to respond to your request to know or access twice in any 12-month period.

We are required to keep a record of your CCPA request for at least 24 months, including any assigned reference number, the request date and nature of the request, the manner in which the request was made, the date and nature of our response, and the basis for any full or partial denial.

B. Verification Of The Person Making A Request.

We need to be reasonably sure that the person making the request about your PI is you, or a representative authorized to make a request on your behalf. We cannot comply with your request if we cannot verify your identity or your authority to make a request for another person. Accordingly, before we can provide you with any substantive response, we must ask for information such as your full name, mailing address, account number, or the last four digits of your social security number, to attempt to verify your identity and locate your records, if any.

To the extent possible, we will not ask you for new information to verify your identity, but instead will request information that we can cross-check against existing records. If we are unable to verify your request without new information, we will delete the new information as soon as practical after processing your CCPA request, except as may be required to comply with the CCPA's record retention requirements.

We will never require you to create an account with us in order to verify your request, but if you already have an account we may use that information to assist with verification. We will only use information you provide to us during the verification process to try to verify your identity or your authority to make the request for another person.

Requests to access the specific pieces of information we may hold, and not just a list of the categories of information, require heightened verification procedures, and we will require you to submit a written declaration under penalty of perjury stating that you are the consumer whose PI is the subject of the request. In addition, certain pieces of information, such as a social security number, driver's license number, government- issued identification number or financial account numbers, account passwords or account security questions and answers, will not be disclosed in response to a CCPA request.

If you wish to authorize someone else to act on your behalf in connection with your CCPA rights, we must receive proof that this person is authorized to do so. Proof can be provided by a consumer verifying his/her own identity directly with us and then providing written authority for a designated person to act on the consumer's behalf, or through receipt of a power of attorney or other legal documentation of authority, or proof of registration with the California Secretary of State as a designated representative of another consumer. You may also make a verifiable consumer request on behalf of a minor child, which requires that you submit proof of your status as a parent or legal guardian.

C. How and When Will We Respond?

Within 10 business days of receipt of your request, we will provide confirmation of your request and an associated reference number. This may be provided by letter, email, or at the conclusion of a web form submission or phone call during which you submit a request.

If you submit a Request to Delete, we may require you to re-confirm your choice to delete the information after verifying your request, but prior to any actual deletion that may be required.

The Company strives to provide a response within 45 days of receiving your request. If we need additional time, or can't verify your request, we will let you know.

We will send our response to your request by U.S. mail or email, at your option. Any information we provide will cover only the 12-month period preceding receipt of

your request.

If we cannot respond to or comply with your Request to Know or Request to Delete, or we otherwise deny your request, we will explain our reasoning and decision in our response. We may, for example, deny a CCPA request if: (1) the request cannot be acted upon because the personal information that was collected and is maintained is solely in our role as a Service Provider, as that term is defined in the CCPA, (2) we cannot verify your identity, (3) we need to retain the information you seek to have deleted in order to complete the transaction for which it was collected, or (4) the information we maintain for you is exempt from the CCPA, such as information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act (GLBA) or the Health Insurance Portability and Accountability Act of 1996 (*HIPAA*).

We do not charge a fee to process your request unless it is excessive, repetitive, or manifestly unfounded, and we have informed you in writing of the reasoning behind a charge and its estimated cost. We will provide a cost estimate before completing your request if we determine that a charge is warranted.

D. Disclosure of Company's Service Provider Status

Company is a "Service Provider" of its clients, as that term is defined in the CCPA. Any PI that Company collects, maintains or processes is at the direction of and/or within the scope of Company's role as a Service Provider and in order to fulfill our contractual responsibilities for the business purpose established in our client contracts. We do not collect or use your PI for our own purposes or any commercial purpose that falls outside the scope of our client contracts. We do not share or disclose PI for any reason that falls outside the scope of our contractual business purpose.

When a Service Provider receives a request to know or a request to delete from a consumer, it shall either act on behalf of the business for which it serves as a Service Provider in responding to the request or inform the consumer that the request cannot be acted upon because the request has been sent to a Service Provider. Thus, Company may respond to your request to know or request to delete by explaining that Company has collected, maintained or processed your PI solely in Company's role as a Service Provider of Company's client and, if feasible, we will provide you with contact information to submit a CCPA request to that client.