Privacy Policy Statement

Your privacy is important to Credit Service International Corporation (CSI). Our Privacy Policy covers how CSI collects, uses, maintains, and discloses your personal information.

CSI takes privacy issues seriously. We will not use or disclose any of your information in a manner that is prohibited by applicable laws and regulations.

Personal Information We Collect

Personal identifiable information (PII) is data that can be used to identify an individual. Below are examples of personal information CSI receives and how it is used.

<u>Creditor Provided Information</u>: Information received from the creditor (client) at time of account assignment includes but is not limited to:

- Full name
- Alias
- Address
- Email address
- Phone number
- Social security number
- Date of birth
- Employer
- Creditor/original creditor
- Account number
- Original charge
- Current balance
- Payments/adjustment (history)

<u>Consumer Provided Information:</u> Information you may provide while communicating with our agency by phone, mail, email, SMS, web applications or other channels of communication. For example, if you enroll for online account access through CSI's account portal or complete a payment plan, information you provide or verify includes but is not limited to:

- Name
- Address
- Email address
- Phone number
- Social security number
- Date of birth
- Employer
- Payment Instrument information (credit/debit card, checking, savings)

Web Application or Email: Information collected when you access CSI through email or web applications includes but is not limited to:

- Internet protocol (IP) address
- Browser type and language
- Internet service provider (ISP)
- Type of computer
- Operating system
- Date/time stamp
- User interface interaction data (such as mouse clicks or navigation on our emails or web applications).
- Uniform resource locator (URL): information showing where you came from or where you go to next.
- Email delivered date/time stamp
- Email opened date/time stamp
- Credit/debit card
- Bank account

Using Personal Information

We use personal information to properly identify the consumer for whom we are attempting to collect a debt; to provide or improve service; to analyze trends; administer our web applications; learn user behavior on our emails and web applications; and to comply with state, federal and local laws for compliance purposes. How personal information is used includes, but is not limited to:

- Sending you communications about your account.
- Verifying your identity (example: when you contact our office you will be asked to
 provide your personal identifiable information so we can verify your identity prior to
 discussing specific account information). You may refuse to supply your personal
 identifiable information but know we may not be able to communicate specific account
 information if we are not able to verify your identity.
- Processing payments and other consumer authorized activity such as completing a
 debt validation request, or dispute review and resolution.
- **Helping us** create, develop, and improve our content and service, including through internal auditing and data analysis.
- **Entering your phone number** to consent/opt in for receiving SMS/MMS text messaging alerts, updates, notifications, or other important account information.
- **Entering your email address** to consent/opt in for receiving SMS/MMS text messaging alerts, updates, notifications, or other important account information.
- Evaluating your candidacy if you apply for employment with CSI.

<u>Email Pixel Tags:</u> In some of our emails we may use pixel tags. Depending on your email provider, pixel tags can enable us to tell when the email has been opened. If you prefer not to be tracked in this way, you should not open our emails.

Email "Click-through URL": In some of our email messages, we use a "click-through URL" linked to webpages on the Sites and some link to web pages on third party sites (see Third Party Websites below). We track this click-through data to ensure you can access information in the electronic form and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

<u>Web Application Cookies:</u> Our web applications may also use cookies to gather information so that we can improve the effectiveness of our services. You may choose to refuse non-necessary cookies, but some parts of the website may not function properly without accepting cookies.

<u>Web Application "do not track" requests:</u> We "do not track" our customer over time and across third party websites to provide targeted advertising and therefore do not respond to DNT signals. We do not sell your information about your visit with third parties.

Sources of Personal Information

We receive your personal information from the party placing your account with CSI for services, such as the creditor, current creditor, or servicer.

We receive information from you directly either through a phone call, text message, email correspondence, mailed correspondent, and/or through visits to our web applications.

We sometimes receive information from third party vendors who help us confirm the validity of our information as it relates to address, phone number, bankruptcy, and deceased information.

If you are a potential candidate for employment with CSI, we may have received your p[personal information from a recruiter external website.

Disclosures to Third Parties

We do not share your personal information with others, except with a limited number of third-party

service providers who help us provide our services, including but not limited to payment processing; mailing; information verification; managing and enhancing customer data, improving our product and services. We share only the minimum amount of information necessary for the third party to assist us in providing our services. We require those third-party service providers to handle data in accordance with relevant laws and ensure they adhere to the security standards we apply to your personal information. Services provided by third-party service providers includes but is not limited to:

- Payment processing: we share your credit/debit card or bank information to the card-issuing bank to process the payment you authorized.
- Content delivery: we share your email address, physical address, or phone number with the delivery service to deliver any communication, message or requested account documents.
- Collectability: we share your name and address to ensure no bankruptcy, deceased, address, or phone changes have occurred since we received account assignment from the creditor.
- Law Enforcement or judicial authorities: we may be court-ordered or subpoenaed to cooperate with law enforcement investigation by providing personal information.
- Local, State or Federal Government Authority: we may be required by law to provide
 your personal information to a local, state, or federal government authority or court. We
 will only disclose information in these instances when there is a lawful basis or if
 disclosure is reasonably necessary to demonstrate compliance with the law.
- Authorized Third-Party: we may provide personal and/or account information to any third-party whom you authorize to receive the information.
- Merger or Acquisition: in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.
- Demographic information: we may share generic aggregated demographic information not linked to any personally identifiable information with our clients, potential clients, and federal, state, or local regulators regarding visitors and users, and their interaction with our products and services.

Sale of Personal Identifiable Information

We do not sell personal information. We prohibit our third-party service providers from selling your information or otherwise using it for marking purposes.

Retention of Personal Information

CSI will retain your personal information for the period required to fulfill our services, meet our contractual obligations, and as required by law. When assessing the retention period, we retain the data for the shortest possible period unless a longer retention period is required by law.

Updating Your Records

To request we correct the data if it is inaccurate, please email CSI at contact@csicontact.com or call 866-844-2358 speak with a representative Monday through Friday, 8am-5pm CST. If you are requesting contact from CSI, it is your responsibility to provide us with true, accurate, and complete information such as phone number, address, email address, or other contact information.

How We Protect Your Information

CSI takes data security seriously. We implement the best practices in data collection, processing, storage, and security to protect against unauthorized access and disclosure. If for some reason CSI discovers that nonpublic personal information is subject to a data security breach, we will comply with applicable laws and regulations to notify you of such data security breach.

Unfortunately, no data transmitted over the internet, or any wireless network can be guaranteed to be 100 percent secure. While we strive to protect your information, you acknowledge that there are security and privacy limitations beyond our control; the security, integrity, and privacy of any and all information exchanged between CSI and its customers cannot be fully guaranteed; and any such information data me be viewed or tampered with in transit by a third party.

Third Party Websites

The site may contain links to other sites of third parties. We do not control the content or links that appear on these other sites and are not responsible for the practices employed by websites linked to or from our site.

We are not responsible for the content or privacy practices of those other sites. Such third parties may have a privacy policy different from ours and the third-party site may provide less security protection than our site. If you decide to visit a third-party site via link on our site, you do so at your own risk.

How We Delete Personal Information

We are required to retain your data due to the underlying contractual relations between you and the creditor. We are also required to retain the personal information for legal reason for as long as the statute of limitations period last for the type of account in collection and for other statutory obligations which sometimes are longer (such as a state licensing statute requiring us to maintain records for a certain period of time or the statute of limitations for a consumer financial law).

Contacting Us

If you have any questions about our privacy policy or practice, please contact our office:

Email: contact@csicontact.com

Phone: 866-844-2358, Monday through Friday 8am-5pm CST

California Consumer Privacy Act

We believe that the services we provide are exempt from coverage under the CCPA. If you are a California resident and want to exercise CCPA rights, please contact us via email contact@csicontact.com or call 866-844-2358, Monday through Friday, 8am-5pm CST.

THIS POLICY WAS LAST UPDATED: 11/9/2023