

## Premiere Credit of North America Privacy Policy for California Residents

### Privacy Policy – Applicable to California Residents

This Privacy Policy is for California residents (“consumers”). It supplements the information contained in Premiere’s Privacy Policy and applies to all Premiere companies. We adopt this policy to comply with the California Consumer Privacy Act (“CCPA”). Any terms defined in the CCPA have the same meaning used in this policy.

#### 1. Information We Collect About You

We may collect and use the following personal information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer, device, or household (“personal information”). We have collected the following categories of personal information from consumers within the last 12 months; however, please know the specific personal information that we collect will vary based on our relationship or interaction with an individual:

- A. **Account information** such as a consumer’s name, Social Security number, date of birth, postal address, email address, telephone numbers, account numbers, account history, and other information associated with an account. Other information associated with an account, for example, may include information provided on a financial statement, such as a consumer’s family size, income, and expenses; or a signature on related documents such as an application or a repayment agreement.
- B. **Skip tracing information** to help us identify and locate a consumer, such as information a consumer posts/shares publicly on social media websites, work history and/or places of employment, addresses and phone numbers, and/or information from a credit report.
- C. **Transaction information** such as payment information (e.g., bank routing and account number, credit card number and information, etc.)
- D. **Registration information** such as a consumer’s username, password, and answers to security questions when setting up access to their account online.
- E. **Geolocation data** such as the physical location of the electronic device used when signing a document electronically.
- F. **Audio, electronic, visual and similar information**, such as call and video recordings.
- G. **Website usage information** such as an Internet Protocol (“IP”) address, geographical location, browser type and version, operating system, system service provider, device type, (if mobile) the type of mobile device and service provider, search traffic source, social traffic source, referral source, search terms, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of a viewer’s use of our websites.
- H. **Characteristics of protected classifications** under California or federal law, such as marital status or veteran status.
- I. **Inferences** drawn from any of the personal information listed above to create a profile about, for example, an individual’s preferences and characteristics.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:

- 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;
- 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.

## **2. How Your Personal Information is Collected**

We collect most of this personal information directly from our clients whom we provide services to, as well as directly from you, such as through telephone conversations, written correspondence through the mail, email or fax, by viewing your public social media/network pages or posts, or other information available publicly online. However, we may also collect information:

- From public record sources (e.g., property records or court records);
- From our service providers (e.g., letter vendor, skip tracing vendors, payment processing vendors, call analytics vendor, and/or electronic signature service provider);
- Information from our affiliates;
- Directly from a third party (e.g., third parties contacted during skip tracing activities pursuant to 16 U.S.C. § 1692b, such as your friends, neighbors, relatives, and/or employer);
- From a third party with your consent (e.g., your authorized representative and/or attorney); and/or
- From activity on our website.

## **3. Why We Use Your Personal Information**

We may use or disclose your personal information for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you supplied information as part of a loan application, we may use that information to collect on the loan, or if you share your personal information to make a payment, we will use that information to process your payment.
- Performing our services, including debt collection, maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying information, processing payments, providing analytic services, or providing similar services on behalf of our business clients.
- To provide you with information or services that you request from us.
- Auditing related to a current interaction with the 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 consumer or otherwise alter an individual consumer’s experience outside the current interaction.
- Undertaking internal research for technological development and demonstration.
- Operating, understanding, optimizing, developing, or improving our sites, applications, services and operations, including by using analytics tools.

- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned or controlled by the business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As necessary or appropriate to protect the rights, property or safety of us, our clients, consumers, or others.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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

#### **4. Who We Share Your Personal Information With**

We routinely share personal information with:

- Our affiliates when deemed appropriate, including companies within Performant Financial Corporation's group of subsidiaries, of which Premiere is one;
- Service providers we use to help deliver our services, such as letter vendors, website hosting, information technology and related infrastructure, email delivery, and auditing;
- Other third parties we use to help us run our business, such as banking services, communications infrastructure, insurers, storage providers, legal professionals, tax professionals, and auditors;
- Third parties approved by you, including third-party payment providers;
- Credit reporting agencies; and
- Government agencies as required by laws and regulations.

In the preceding twelve (12) months, we have not sold any personal information. Also, we do not market or advertise to consumers.

#### **5. Your Rights**

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

##### ***a. Disclosure of Personal Information We Collect About You***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we share personal information, if any.
- The specific pieces of personal information we have collected about you.

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;
- Reidentify 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.
- Honor your request in some instances, such as when we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. We will advise you in our response if we are not able to honor your request. We will not provide Social Security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

**b. Disclosure of Personal Information Sold or Used for a Business Purpose**

In connection with any personal information we may sell or disclose to a third party for a business purpose, you have the right to know:

- The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and
- The categories of personal information that we disclosed about you for a business purpose.

**c. Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- 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 our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent.

- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with an existing legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

**d. Protection Against Discrimination**

You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:

- Deny goods or services to you;
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

**6. How to Exercise Your Rights**

To exercise any rights described herein, please submit a verifiable consumer request to us by either:

- Phone: (855) 403-1894
- Mail:  
Attention: Compliance Department – CA Privacy Rights  
Premiere Credit of North America  
PO Box 19309  
Indianapolis, IN 46219

Please note that you may only make a data access or data portability disclosure request twice within a 12-month period.

**7. Verifying Your Identity (i.e., verifiable consumer request)**

If you choose to contact us, you will need to provide us with:

- Enough information to identify you (i.e., your full name, postal address, and account or matter reference number);
- Proof of your identity:
  - If you have an account with us, provide the last four numbers of your Social Security number and date of birth
  - If you do not have an account with us, provide your phone number and a copy a government issued identification card showing your address
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We are not obligated to make a data access 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 you request will be used solely for the purposes of verification.

## **8. Response Timing and Format**

We endeavor to respond to a verifiable 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 verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. 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 before completing your request.

## **9. Changes to Our Privacy Notice**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated policy on our website (with a new "Last Updated" date) and/or notify you by other means consistent with applicable law.