

## REVCO SOLUTIONS CALIFORNIA PRIVACY NOTICE

Last Updated: 05/25/2023

This California Privacy Notice (the "Privacy Notice" or "Notice") describes how Revco Solutions ("we," "us," "ours") collects, uses, and discloses Personal Information (defined below) of consumers and business contacts who reside in California, and how to exercise any rights California residents have with respect to this information. This Privacy Notice does not apply to our privacy practices when acting solely as a service provider (as defined under California privacy laws) for another business.

### **NOTICE AT COLLECTION**

## **INFORMATION WE COLLECT**

### **PERSONAL INFORMATION**

We collect information that personally identifies, relates to, describes, or is capable of being associated with you ("Personal Information"), including:

Categories of Personal Information	Examples of Specific Types of Personal Information Collected
A. Identifiers	Real name, alias, signature, driver's license or state identification card number, Social Security number, Revco account login credentials, postal address, email address, telephone numbers, account number, bank account number, credit card number, debit card number, date of birth, insurance policy number, medical information, or health insurance information.

Categories of Personal Information	Examples of Specific Types of Personal Information Collected
B. Protected classification characteristics	Age, language preferences, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
C. Internet or other electronic network activity information	Internet Protocol address, browsing history, search history, and information regarding a consumer's interaction with an internet web site, application.
D. Sensory data	Audio.
E. Professional or employment-related information	Employment or employment history, title, role.
F. Inferences drawn from any of the information identified above	Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
G. Personal Information categories listed Cal. Civ. Code § 1798.80(e)	To the extent collected under another category of Personal Information above.

Some of the Personal Information listed above may be considered Sensitive Personal Information under applicable privacy law. This includes driver's

license number, Social Security number, or other government identification card information, Revco account login credentials, health information, and sexual orientation. Each type of Sensitive Personal Information may overlap with a category of Personal Information listed above.

The type of Personal Information we collect about you may vary based on how you use our Sites and/or Services and your relationship with us.

## **BUSINESS INFORMATION**

We also collect information about businesses and their representatives that engage with us such as EIN, TIN, address, phone number, email address, bank account information. This information is generally not considered Personal Information because it relates to a business. If such Business Information relates to a business contact person, we will treat it as Personal Information.

## **USAGE DATA AND SITE ACTIVITY**

When you visit the website, we automatically collect certain information, like your IP address, browser type and operating system, the domain from which you came, the page you are viewing, and the date and time of your visit ("Usage Data"). We use this information for a number of purposes, such as investigating security incidents, running analytics to understand usage, and for compliance with security standards. If the data we automatically collect is capable of being associated with you, directly or indirectly, we treat it as Personal Information under the categories of Identifiers or Internet or other electronic network information, as appropriate. If this information is not capable of being individually associated with you, we treat it as Usage Data.

## **COLLECTION AND USE LIMITATION**

We will collect the minimum amount of Personal Information necessary to provide our services. 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.

When we act as a service provider to our clients or a third-party debt collector, we are restricted from retaining, using, or disclosing Personal Information for any purpose other than for the business purposes specified in our contract with such client.

## **HOW WE USE INFORMATION**

We may use Personal Information for business purposes, such as to:

- Provide you with our website and payment portal services.
- Perform day-to-day business operations such as accounting, general consumer service operations, business administration, quality assurance and auditing, and other normal business activities on behalf of our clients and service providers.
- Performing debt collection services, including collect on outstanding account balances, processing payments, maintaining, or servicing accounts, providing client services and consumer assistance, verifying client and consumer information, providing analytic services, and furnishing consumer information to consumer reporting agencies.
- Conduct research and analysis for maintaining, protecting, and developing services, maintaining, and improving the safety of our products and services, and preventing misuse.
- Respond to your inquiries or comments.
- Comply with applicable legal requirements, industry standards, contractual obligations, our policies and procedures, and take actions that we deem necessary to preserve and enforce our rights and the rights of others.
- Operate information security and anti-fraud programs including detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity.

We use Sensitive Personal Information as follows:

- *Social security numbers, drivers' licenses, government identification cards* – to provide our services, service accounts, collect on accounts, and as otherwise required by law.
- *Revco account login information* – to permit access to consumer's online accounts, and in connection with our security and anti-fraud programs.
- *Health information to include age, health, prescriptions, diagnostics, insurance or medical claims data* – to verify services provided and current balances due.

We may also use Personal Information and/or Sensitive Personal Information as described to you at the point of collection, with your consent, or as otherwise required or permitted by applicable laws. We only use Sensitive Personal Information related to California residents for purposes permitted by California Consumer Privacy Act regulations (11 CCR 7000 et seq.).

## **THIRD-PARTY SALE OR SHARING OF PERSONAL INFORMATION**

We do not sell or share your Personal Information to any third party for targeted or cross-context behavioral advertising purposes.

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

Revco Solutions will keep your Personal Information while you have an account placed with us and may retain your Personal Information for up to 10 years thereafter depending on your relationship with us, or as otherwise required by law or pursuant to contractual obligation. Revco Solutions thereafter deletes or anonymizes such information in accordance with applicable laws.

## **OTHER PRIVACY DISCLOSURES**

# HOW WE COLLECT INFORMATION

## YOU

We may ask you to provide us with Personal Information when you communicate with us online or offline, including web forms, surveys, or marketing programs. You may elect to share Personal Information with us; however, if you choose not to provide the requested information, you may not be able to use some or all of the features of our Sites or Services or we may not be able to fulfill your requested interaction. We may capture your contact information such as name, address, phone number, email address, and any other Personal Information you choose to provide, when you contact us.

## CLIENTS

We may collect Personal Information directly from our clients for whom we provide debt collection services. We process this information in accordance with this privacy policy and the applicable client's instructions.

## THIRD-PARTY DATA SOURCES

We may collect Personal Information from third-party data sources such as service providers, other Revco customers, fulfillment and account servicing companies, credit bureaus and/or reporting agencies, analytics firms, third parties contacted during location activities pursuant to 15 U.S.C. §1692b, public records, government agencies, and from a third party with your consent (e.g., your authorized representative and/or attorney).

## COOKIES AND AUTOMATED TOOLS

We use cookies (a small text file placed on your computer to identify your computer and browser) and other automated tools such as pixels to collect website usage data, to improve the site and our services, as well as your experience with the site. Many web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate

when a cookie is being sent. However, certain features of our Sites may not work if you delete or disable cookies. Google Analytics is one tool we use.

## **HOW WE DISCLOSE INFORMATION**

### **SERVICE PROVIDERS**

We may disclose your Personal Information to other businesses (“Service Providers”) to provide services to us or on our behalf. Categories of Service Providers we use include:

- Fulfillment and account servicing vendors.
- Letter vendors.
- Location vendors.
- Payment processors.
- Research and development vendors.
- Consumer reporting agencies.
- Data and business analytics vendors.
- Electronic signature providers.
- IT and network administration vendors.
- Professional service firms and consultants.
- General business operations service providers.
- Computer software platform providers

We require each Service Provider to use reasonable security measures appropriate to the nature of the information involved to protect your Personal Information from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information we provide to them other than as specified by us in connection with the services rendered to our customers. In the past twelve months we may have disclosed one or more categories of Personal Information we collect (listed above) with one or more Service Providers.

## **PERSONAL INFORMATION DISCLOSURES TO CONSUMER REPORTING AGENCIES**

Consumer Reporting Agencies (“CRAs”) collect and maintain information on consumer and business credit profiles on behalf of organizations in the United States. We may disclose information about you with CRAs and may carry out periodic searches with them to verify your identity or manage your account.

Details of your account(s) with us may be sent to CRAs and recorded by them. This information may be supplied by CRAs and may be used and searched by us and other organizations, such as debt collection agencies, in order to:

- consider applications for credit and credit related services;
- locate debtors and recover debts; and
- manage your accounts.

Upon its client’s request, Revco Solutions may furnish account information to Experian, Equifax, and/or Trans Union. You have a right to obtain an annual copy of your credit file from CRAs by visiting <https://www.annualcreditreport.com>.

## **OTHER THIRD-PARTY DISCLOSURES**

We may occasionally disclose your Personal Information to third parties who do not provide services to us, for purposes such as:

- To comply with the law;
- To respond to legal requests (including court orders, investigative demands and subpoenas) if, in our discretion, we believe it is necessary or appropriate;
- To prevent or stop any illegal, unethical, or legally actionable activity;
- To protect the safety, property, or rights of ourselves, consumers, or any other third party;



- If we are merged, acquired, or sold, or in the event of a divestiture, restructuring, reorganization, or transfer of some or all of our assets and the disclosure is necessary to complete the transaction;
- To businesses controlling, controlled by, or under common control with us;
- To conduct any other legitimate business activity not otherwise prohibited by law; and
- For additional purposes with your consent where such consent is required by law.

In the past twelve months, we may have disclosed the categories of Personal Information (listed above) to the following categories of third parties:

- CRAs: all categories of Personal Information required to furnish information regarding an account.
- Third parties authorized by consumers, such as attorneys representing the consumer and debt settlement companies: all categories of Personal Information the consumer directs us to disclose.
- Government agencies and courts: identifiers.
- Parties to Litigation: identifiers.

## **Information Security**

### **SECURITY AND CONFIDENTIALITY**

Revco Solutions strives to protect Personal Information that we collect, maintain, and disclose through the use of reasonable administrative, physical, and technical safeguards. Personal information submitted online is transmitted through transport layer security (TLS), which is a protocol for establishing a secure connection for transmission. Our security program is designed to: (1) ensure the security and confidentiality of Personal Information, (2) protect against any anticipated threats or hazards to the security or integrity of the information, and (3) protect against unauthorized access, alteration, and unlawful disclosure of the information. We dispose of

such information by taking reasonable measures to protect against unauthorized access to or use of the information.

## **CHILDREN'S PRIVACY**

Our website is not intended for individuals under the age of 18. We do not knowingly collect Personal Information of individuals under the age of 18 on our website.

## **California Privacy Rights**

As a resident of California, you may have additional rights to access and control your Personal Information. Exemptions may apply. We are unable to act upon a request submitted to us relating to Personal Information we process solely as a service provider, as defined under California privacy laws, on behalf of a client. If you submit a request related to Personal Information we process in this context, we will inform you of the identity of the applicable client so that you may submit your request directly to them. Consumer privacy rights include:

### **RIGHT TO ACCESS PERSONAL INFORMATION**

You have the right to request twice per 12-month period that we provide you (i) the categories or specific pieces of Personal Information we collected about you; (ii) the categories of sources from which we collected your Personal Information; (iii) the business or commercial purpose for which we collected your Personal Information; and (iv) the categories of third parties with whom we sold, shared, or disclosed your Personal Information, including the categories of Personal Information sold, shared, or disclosed to each and the purposes for doing so. We are not permitted to provide access to specific pieces of Personal Information that creates a high risk of potential harm from disclosure to an unauthorized person such as social security numbers and driver's license numbers.

### **RIGHT TO DELETE PERSONAL INFORMATION**

You have the right to request that we delete your Personal Information, however, we are not required to honor a deletion request if a legal exemption applies such as if we need the information to complete a requested or reasonably anticipated transaction, prevent security incidents or fraud, enable internal uses that are reasonably aligned with your expectations, or comply with legal obligations. We will retain a copy of your deletion request for at least two years as required by law.

## **RIGHT TO CORRECT PERSONAL INFORMATION**

You have the right to request that we correct inaccurate Personal Information we maintain about you. After you request to correct inaccurate Personal Information, we will provide instructions for you to provide us with optional documentation to support your request and we will consider it. We may decline to correct your Personal Information if a legal exemption applies such as if we determine that your request is fraudulent or abusive or if we determine, based on the totality of the circumstances, that your correction is more likely inaccurate than accurate. We may decide to delete your allegedly inaccurate Personal Information instead of correcting it.

## **SUBMITTING A REQUEST**

If you wish to exercise any of the rights listed above, please contact Revco Solutions by doing one of the following:

- Submit online to [mail@revcosolutions.com](mailto:mail@revcosolutions.com).
- By mailing a request to: PO Box 965, Columbus, OH 43216
- Toll free telephone: 1-855-202-0113

You will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We are not obligated to fulfill your request 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. We will process verified requests within 45 days, subject to any applicable exceptions and extensions permitted by law.

### **AUTHORIZED AGENT**

If you are an authorized agent submitting a request for another consumer, you must provide a copy of a lawful power of attorney or written authorization from the Consumer (along with proof of your identity). You will be provided options on how to provide this documentation after submitting the request. We may contact you or the Consumer on whose behalf you claim to act to verify your authorization.

### **NON-DISCRIMINATION NOTICE**

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

### **CALIFORNIA "DO NOT TRACK" DISCLOSURE**

Do Not Track is a web browser privacy preference that causes the web browser to broadcast a signal to websites requesting that a user's activity not be tracked. Currently, our Sites and Services do not respond to "do not track" signals.

### **POINT OF CONTACT**

If you have any questions or comments about Revco Solutions' privacy policy or our privacy practices, please contact us at:

Revco Solutions  
Attn: Consumer Assistance  
PO Box 965  
Columbus, OH 43216

Phone: 1-855-202-0113

[mail@RevcoSolutions.com](mailto:mail@RevcoSolutions.com)