

## **Privacy Policy**

Credit Solutions, LLC's ("Credit Solutions") utmost concern is protecting our consumers private information. Steps have been taken to protect our "consumer relationship" as well as the privacy of shared or collected sensitive data.

Credit Solutions' website is located at [www.cs-llc.com](http://www.cs-llc.com) (its "website") is not intended for individuals less than the age of eighteen and Credit Solutions does not knowingly collect data relating to individuals less than the age of eighteen.

Nothing in this Privacy Notice is intended to contradict your rights under the Fair Debt Collection Practices Act. Credit Solutions will not disclose any information to third parties that is otherwise prohibited by the FDCPA.

## **Data Controller**

Questions, comments, and complaints about Credit Solutions data practices may be submitted to:

Credit Solutions, LLC  
2277 Thunderstick Drive  
Suite 400  
Lexington, KY 40505

Toll-free Telephone Number: 877-265-1485

## **Information We Collect**

We may have collected the following categories of personal information from consumers within the last 12 months:

<b>Categories of Personal Information</b>	<b>Examples of Specific Types of Personal Information Collected</b>	<b>Collected</b>
A. Identifiers	A real name, alias, postal address, email address, telephone numbers, Internet Protocol address, account number, Social Security number, date of birth, or other similar identifiers.	Yes
B. Personal Information	A name, signature, Social Security number, physical characteristics or description, address, telephone	Yes

	number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, 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, genetic information (including familial genetic information).	Yes
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Internet or other electronic network activity information	Browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Yes
F. Geolocation data	Physical location or movements.	Yes
G. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
H. Professional or employment-related information	Current or past job history.	Yes

I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes
J. 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/	Yes

### **How We Use Your Information**

Personal information is collected solely for the purpose of debt recovery in a lawful manner and remains part of our records until we determine the information is no longer needed, or we are required by law to delete such information. We will collect the minimum amount of data necessary to collect a debt.

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. We do not sell and will not sell your personal information.

### **How We Collect Your Information**

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

- From publicly accessible sources (e.g., property records or court records);
- From your transactions with us;

- From our service providers (e.g., letter vendor, location vendors, payment processing vendors, call analytics vendor, and/or electronic signature service provider);
- Directly from a third party (e.g., third parties contacted during location activities pursuant to 15 U.S.C. §1692b, such as your friends, neighbors, relatives, and/or employer);
- Consumer reporting agencies (CRAs)
- From a third party with your consent (e.g., your authorized representative and/or attorney); and
- From activity on our website.

### **How We Share Your Information**

Credit Solutions may share personally identifiable information it collects with its employees who need to know that information to service your account. Except as provided below, Credit Solutions does not share or disclose any personally identifiable information to any company or marketing group external to Credit Solutions. Credit Solutions may share your personal information with third parties to the extent it is reasonably necessary to manage or service your account, verify employment, determine location, process payment, fulfill a transaction, provide customer service, or as otherwise authorized by law.

Further, Credit Solutions may disclose personally identifiable information (i) to another entity with which Credit Solutions enters or reasonably may enter into a corporate transaction, such as, for example, a merger, consolidation, acquisition, or asset purchase, (ii) to a third party pursuant to a subpoena, court order, or other form of legal process or in response to a request by or on behalf of any local, state, federal, or other government agency, department, or body, whether or not pursuant to a subpoena, court order, or other form of legal process, or in connection with litigation brought against, or on behalf of, Credit Solutions, where appropriate, (iii) to a third party if determined by Credit Solutions in its sole judgment that such disclosure is appropriate to protect the life, health, or property of Credit Solutions or any other person or entity, all in compliance with applicable law, (iv) to third parties as authorized or designated by you, or (v) to conduct any other legitimate business activity not otherwise prohibited by law. The foregoing is not intended to obviate or displace any legal obligations or duties applicable to Credit Solutions.

Except as necessary for Credit Solutions to provide the services, information, or products requested by a website user, or except for the disclosures identified in the preceding paragraphs, the user may opt out of having his or her personally identifiable information, which has been voluntarily provided to Credit Solutions

through or from its website, prospectively retained by Credit Solutions, used by Credit Solutions for secondary purposes, or disclosed by Credit Solutions to third parties.

E-mail posted or sent to Credit Solutions may not be secure against interception by unauthorized individuals. To protect against interception by unauthorized individuals, or because we cannot verify your identity, we may be unable to respond to e-mail requests concerning accounts placed for collection unless you have requested or authorized us to do so.

### **Your Choices**

Credit Solutions offers you certain choices in connection with the personal data it collects from you, including:

**Your Credit Solutions Account:** You may review, update and correct your contact information, including your telephone number and email address, after logging in to the website, or by calling our office.

**Your Choice to Decline Cookies:** Credit Solutions website may utilize a “cookie” to recognize previous visitors and/or save login information. This information is stored on the user’s computer and only includes information previously entered by the user. This can include usernames, passwords, etc. You do not have to allow Credit Solutions’ website to do this in order to visit or use the website. You may adjust your browser settings to decline cookies if you do not want to accept Credit Solutions’ cookies.

**Your Payments:** You can elect not to utilize the payment portal of Credit Solutions’ website and not to make payments via credit card or check.

If you have any questions regarding any of these choices, please contact Credit Solutions.

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### **How Long We Keep Your Information**

Credit Solutions will retain your personal data until we determine the information is no longer needed, or as otherwise required by law.

### **How We Protect Information**

Credit Solutions has implemented physical, electronic, and procedural security safeguards to protect against the unauthorized release of or access to personal information. We employ internal and external system safeguards designed to protect confidentiality and security of personal information.

The confidentiality of any communication or material transmitted to or from Credit Solutions via the website or via e-mail cannot be, and is not, guaranteed. You acknowledge that the technical processing and transmission of the website's content may be transferred unencrypted and involve: (a) transmissions over various networks; and (b) changes to confirm and adapt to technical requirements of connecting networks or devices.

Any information exchanged by you will not be stored on Credit Solutions' website. We utilize third party servers to encrypt information that will be stored. We do not store debit or credit card and/or checking account and routing number information for any payments processed through our website.

If any questions arise about security, please contact Credit Solutions using the information provided above.

### **Links to Other Websites**

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Privacy Notice Changes**

Credit Solutions may change this Privacy Notice at any time. Notice of any new or revised Privacy Notice, as well as the location of the new or revised statement, will be posted on the website after the change. It is the obligation of users visiting the website before the change to learn of changes to the Privacy Notice since their last visit.

Last Updated: [\_\_/\_\_/2020]