

California Privacy Notice

Last Revised: February 1, 2023

This Privacy Policy provides additional information solely for California residents, as required under the California Consumer Privacy Act of 2018 (“CCPA”). As a California resident, you have certain rights, subject to legal limitations, regarding the collection, use, and sharing of your personal information described below.

The information below applies to personal information as defined in the CCPA collected both online and offline. For purposes of this section, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer/resident or household.

Personal information does not include publicly available information, information that has been de-identified, aggregated consumer information, and 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.

If you have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with our Privacy Notice, which offers you certain choices with respect to the use and sharing of your personal information.

Categories of Personal Information We Collect & Disclose

Category	Examples	Collected	Disclosed for a business purpose(s)
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	YES	YES
B. Personal information categories as described in the California Customer Records statute – Cal. Civ. Code § 1798.80(e)	A name, signature, social security number, physical characteristics or description, address, telephone 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.	YES	YES
C. Characteristics of protected classifications under California law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex/gender (includes pregnancy, childbirth, breastfeeding and/ or related medical conditions), gender identity, gender expression, sexual orientation, genetic information, and veteran or military status.	YES	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	YES
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	<i>NO for customers</i> <i>YES for certain employees</i>	<i>NO for customers</i> <i>YES for certain employees</i>
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	YES

G. Geolocation Data	Physical location or movements.	YES	YES
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information, including call recordings and photographs.	YES	YES
I. Professional or Employment-Related Information	Current or past employment history, qualifications, licensing, and disciplinary record.	YES	YES
J. Non-Public Education information	Education records directly related to a student maintained by an educational agency or institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes and student disciplinary records.	NO	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	YES

In the past 12 months, we have collected, and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure. Some personal information included in the categories may overlap with other categories.

Categories of Sources from Which Personal Information Is Collected

We may collect the categories of personal information listed above from the following categories of sources:

- Information directly or indirectly from you or your agent, including, but not limited to, information from applications, worksheets, questionnaires or other documents (such as name, address, driver's license number, Social Security number and amount of unsecured debt);
- Information directly and indirectly from activity on our services, including, but not limited to, submissions through our website portal or website usage details collected automatically;

- Information about your transactions with us, our affiliates or others (such as products or services purchased, claims made, account balances and payment history);
- Information from Absolute Debt Relief LLC subsidiaries or affiliates;
- Information from third parties, including, but not limited to, service providers, advertising and marketing affiliates, credit reporting agencies, credit and charge card companies;
- Information from public sources (such as information you submit in a public forum, a blog, chat room, or social network).

Business or Commercial Purposes for Using Personal Information

We may use or disclose the personal information we collect for one or more of the following “business purposes” or “commercial purposes” (as defined in the CCPA):

- Auditing Interactions with Consumers. For example: monitoring traffic to our Websites, counting ad impressions, and auditing legal and regulatory compliance;
- Security. For example, maintaining the safety, security, and integrity of our Website, products and Services, databases and other technology assets and our business, including preventing fraud, detecting security breaches and prosecuting violators, and responding to law enforcement requests and meeting requirements of applicable law, court order, or governmental regulations;
- Debugging/Repair. For example, identifying and repairing errors in our Websites’ functionality;
- Certain Short-term Uses. For example, ad customization that does not involve or contribute to profiling;
- Performing Services. For example, creating, maintaining, customizing and securing your account with us, processing your purchases, transactions, and payments, hosting our Websites, fulfilling subscription orders, managing databases, performing analyses, billing, and marketing services such as managing promotions and contests;
- Internal Research for Tech Development. For example, testing, research, analysis, and product development, including to develop and improve our Website, products, and Services;
- Quality and Safety Maintenance and Verification. For example, improving, upgrading or enhancing our products, Services or Websites, and verifying the quality or safety of our Websites or Services;
- Other Commercial Purposes. For example, as described to you when collecting your Personal Information such as for promotions or contests, or to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which Personal Information we hold is among the assets transferred.

Categories of Third Parties Personal Information Is Shared With

We may disclose personal information to the following categories of third parties for a “business purpose” or “commercial purpose” (as defined in the CCPA):

- Absolute Debt Relief LLC affiliates and subsidiaries;
- Vendors and service providers;
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you;
- Government agencies as required by laws and regulations.
- An entity involved in the sale of our business.

Sale of Personal Information

In the past 12 months, we have not “sold” personal information subject to the CCPA, including personal information of minors under the age of 16. For purposes of this Notice, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration. As noted elsewhere in this Notice, we share personal information with other businesses for a variety of reasons. While we often benefit from such exchanges, we do not share personal information for the sole purpose of receiving compensation for that information. However, we support consumer choice regarding use of consumers’ personal information and for this reason, refer you to the “**Right to Opt-out of Sales**” section immediately below for more information on how to register your choice with us with regard to future uses of your personal information.

Your CCPA Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your rights under the CCPA and explains how to exercise those rights. Subject to certain exceptions, California consumers have the right to make the following requests:

Right to Opt-out of Sales: We are not selling personal information of California residents. Further, we will not sell personal information if we have actual knowledge that the consumer is less than 16 years of age, unless we receive affirmative authorization (“opt-in”) from either the consumer between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age.

If you would like to register your choice with regard to future uses of your personal information, please visit our CCPA Request form by clicking [here](#), and we will register your details for this purpose.

Right to Access: 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 request, we will disclose to you:

- the categories of personal information we collected about you;
- the categories of sources of personal information we collected about you;
- our business or commercial purposes for collecting or selling that personal information;
- the categories of third parties with whom we have disclosed or shared that personal information; and
- the specific pieces of personal information we collected from you.

Right to Delete: You have the right to request that we delete and direct any service providers that have received that personal information to delete, the personal information that we have collected and retained, subject to certain exceptions, including if we need the personal information for a reason related to our business, such as:

- providing goods or services to you;
- detecting and resolving issues related to security or functionality;
- complying with legal obligations;
- conducting research in the public interest;
- exercising free speech or ensuring another's exercise of free speech; or
- using the information for internal purposes that a consumer might reasonably expect.

Once we receive and confirm your verifiable request, we will delete (and, if applicable, direct our service providers to delete) your personal information from our records, unless an exemption applies.

Submitting Requests: You can submit an access request and/or deletion request by either:

- Accessing our [CCPA Request Form](#)
- Calling us at [1-949-298-8600](tel:1-949-298-8600)
- Emailing us at privacy@absolutedr.com

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: providing your email and phone verification, known customer information, and/or other information needed to verify your identity depending on the sensitivity of the Personal Information in question.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Response Timing and Format: We use good faith efforts to respond to a verifiable consumer request within forty-five (45) days after its receipt. If we need more time (up to 90 days), we will inform you of the reason and the needed extension period in writing.

We will deliver our written response by email if one is attached to your account with us. If no email is on file, we will deliver our written response by first class mail to the mailing address attached to your account with us.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. If we cannot comply with any portion of a request, the response we provide will also explain why, if applicable.

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.

Non-Discrimination: You have the right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA. We will not discriminate against you for exercising any of your CCPA rights or impose unreasonable requirements on financial incentives offered to California consumers related to your personal information. We may offer different prices, rates, or quality of goods or services if the difference is reasonably related to the value of your personal information.

Changes to this Notice

This Notice may change at any time and from time to time to reflect changing legal, regulatory or operational requirements. If we make material changes, we will post the updated notice on this page and change the "Last Revised" date at the top. Any amendments or modifications to this Notice will become effective immediately upon posting. Your continued use of any of Our Services following the posting of an updated version of this Notice will constitute your acceptance of the updated Notice. If you do not agree with the revised Notice, please discontinue use of any of Our Services.

SUBMIT A REQUEST

FOR CALIFORNIA RESIDENTS ONLY

As a California resident, you have certain rights, subject to legal limitations, regarding the collection, use, and sharing of your personal information under the California Consumer Privacy Act (“CCPA”) as described in our Privacy Policies and the California Privacy Notice.

If you would like to submit a request under the CCPA, please complete and submit the form found on our website.

Please note that while we will comply with any applicable obligations under the CCPA, we may not have an obligation to, or may not be able to, honor your request.