

PRIVACY POLICY

Effective: December 2023

Last Updated: January 23, 2023

Introduction

This Privacy Policy was created so you can understand how your data is used. When you utilize our website, you affirm that you understand our privacy policy and agree with it.

All references to "Company," "we," "us," and "our" shall mean Huntington Financial Services LLC (HFS). HFS's privacy policy ("Privacy Policy") tells you about the information we may collect from you or that you may provide when you visit the Website. This privacy policy also informs you of our process for collecting, using, maintaining, protecting, and disclosing that information.

HFS reserves the right to change this Privacy Statement from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Statement. We may also provide additional notice of changes, as appropriate.

The personal identifiable information (personal information) obtained by HFS includes and is generally limited to personal identifying information like social security numbers and date of birth, contact information like address, telephone number, and email address; information from credit report, financial data like account numbers, and IP addresses when consumers view our website, use our online payment function, or complete an online employment application.

1. What Personal Information We Collect

- **Information You Provide:** We receive and store personal information when you sign up for online statements, when you view your account online, when you make an online payment, and when you complete an online job application.
- **Information from Other Sources:** We receive personal information from the current creditor of your account as well as credit reporting agencies and third-party location services for the purpose of "skip tracing". Skip tracing is permissible under the Fair Debt Collection Practices Act 15 USC 1692a and Fair Credit Reporting Act 15 U.S. Code §1681b in connection with the collection of a debt.

- **Usage and Tracking Information:** When you contact our website, we systemically receive "Usage Data" which is the information that your browser sends when you visit the Website. We also receive tracking data in the form of cookies. Cookies are small files that contain a small amount of data, typically a unique identifier. They are sent to your browser by a website and are stored on your device. Our website uses cookies.
- **Company Site Access Information:** We track how consumers access our website to provide a more visibly pleasing experience whether it be through a mobile telephone, tablet, or other device: the type of device, unique device ID, device IP address, device operating system, and diagnostic data.

2. What Do We Use Your Personal Information For

We use your personal information to provide collection services to our clients and offer consumers online account access.

- **In connection with the collection of debt:** Huntington Financial Services LLC (HFS) is a debt collection agency and any information we obtain is used for that purpose. We collect personal information obtained in accordance with the Fair Debt Collection Practices Act 15 USC 1692a § 803.7 Definitions "location Information", the Fair Credit Reporting Act 15 U.S. Code §1681b "Permissible purposes of consumer reports" and provided by the consumer themselves.
- **Website Services:** Online payment capabilities, account access, information request, online employment applications, and other web-based services.
- **Consumer Communications:** We use your personal information to communicate with you in relation to HFS services, required disclosures or to resolve consumer dissatisfaction via different channels (e.g., by phone, e-mail, mail).
- **Compliance Purposes:** As we believe appropriate (a) in order to comply with applicable law & legal process, including to respond to valid requests by public authorities (for example, a court, government agency, or law enforcement), (b) to enforce our terms and conditions, (c) to detect, prevent and/or investigate possible wrongdoing, security incidents, or fraudulent activities in connection with the Company Site, our technology and products, or the like, (d)

to protect our operations or those of our affiliates, (e) to protect our rights, property, privacy, safety, or that of our affiliates, you or others, or (f) to allow us to pursue available remedies or limit the damages that we may sustain.

3. Do we share your personal information.

- The Sale of Consumer Information: HFS does collect personal information in connection of the collection of a debt but does not sell personal consumer information.
- Account Transfer: In accordance with the Fair Debt Collection Practices Act, obtained information is provided to our client when the account is paid in full, settled in full, returned for closure or compliance purposes or withdrawn by client request.
- Advertising: HFS does not share or sell your information for advertising.
- Combining Information: We may combine personal information that you submit on or through the HFS website with information that we collect from and about you from other sources, offline and online, including our client.

4. How Secure Is My Personal Information?

Our online systems are designed with consumer and client data privacy in mind. Our organization goes through an annual audit to ensure organizational and systemic compliance.

- HFS protects the security of personal consumer information during transmission by using encryption protocols and software.
- HFS follows the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.
- HFS utilizes physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal consumer information.
- It is important for the consumer to protect against unauthorized access to your password and to their computers, devices, and applications. Consumers should be sure to sign off when finished using a shared computer.

5. How Secure Is My Personal Information?

You can access your account information, including your name, address, email address, payment options, payment history, profile information.

6. Personal Information Collected

The following are examples of information we collect when performing collection agency services for our client, you create an online profile to review your account data and/or make online payments or your complete online employment application.

- Personal Identifiable Information including Name, address, email address, social security number, telephone number, cellular number, current employment, prior employment.
- We also collect information that does not specifically identify you including credit card numbers, debit card numbers, bank account information and associated expiration dates.

7. Accessing and Correcting Your Information

You can make updates to your contact information on the Website. You may also send us an e-mail at scott@hfs.business to correct any personal information that you have provided to us.

We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

8. California Consumer Privacy Act

California Consumer Privacy Act ("CCPA") Rights: The CCPA requires us to communicate information about rights California consumers have to request access to their personal information (as that term is defined by the CCPA), to request deletion of their personal information, to request additional details about our information practices, to request to opt out of the "sale" of their personal information (if applicable), and the right not to be discriminated against.

For details about how to exercise these rights, please email us at scott@hfs.business, or call our toll-free telephone number at 888-945-3745.

California consumers may designate an authorized agent to exercise these options on their behalf. If you would like to use

an authorized agent registered with the California Secretary of State to exercise these rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests on your behalf. We will not discriminate against you if you choose to exercise your rights.

Sales of Personal Information: We do not sell your personal information within the meaning of the CCPA.

If you have any questions about this Privacy Statement, please contact us at:

Huntington Financial Services LLC.

7222 Edinger Ave S 200 Huntington Beach, CA 92647

Toll Free: 888-945-3745

Email: scott@hfs.business