

Effective Date: 01-01-2020

PRIVACY NOTICE

PURSUANT TO THE CALIFORNIA PRIVACY RIGHTS ACT

This California privacy notice (“Notice”) pursuant to the California Privacy Rights Act of 2020, Cal. Civil Code § 1798.100 et seq., (“CPRA”), supplements the information contained in the Privacy Policy of Rausch Sturm LLP (“Rausch Sturm,” “we,” “us,” or “our”), and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). Rausch Sturm is a debt collector. This Notice applies to both our online and offline practices. We adopt this Notice to comply with the CPRA. Any terms defined in the CPRA have the same meaning when used in this Notice. For questions concerning this Notice or to obtain a copy of this Notice in an alternative format or in Spanish, please call us at 855-517-6279.

A. Consumer Rights

The CPRA provide consumers with specific rights regarding their personal information. This section describes your rights.

1. General Duties of Businesses that Collect Personal Information:

You have the right to be advised at or before the point of collection of the following:

- The categories of personal information to be collected and the purposes for which the categories of personal information are collected or used and whether that information is sold or shared;
- The categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used and whether that information is sold or shared;
- The length of time that we intend to retain each category of personal information and sensitive personal information, or the criteria used to determine that period.

We will not sell or share your personal information or sensitive personal information. If in the future, we anticipate selling or sharing your personal information, we will provide you with the opt-out rights pursuant to the CPRA.

We collect, use and retain personal information only as reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed, and will not be further processed in a manner that is incompatible with those purposes.

If we should disclose personal information to a service provider or contractor for a business purpose, we have enter into an agreement with the service provider or contractor that:

- Specifies that the personal information is sold or disclosed by the business only for limited and specified purposes;

- Obligates the service provider or contractor to comply with applicable obligations under this title and obligate those persons to provide the same level of privacy protection as is required by this title;
- Grants us the rights to take reasonable and appropriate steps to ensure that the service provider or contractor uses the personal information in a manner consistent with our obligations under the CPRA;
- Requires the service provider or contractor to notify us if it makes a determination that it can no longer meet its obligations; and
- Grants us the right, upon such notice, to take reasonable and appropriate steps to stop and remediate unauthorized use of personal information.

We have implemented reasonable security procedures and practices appropriate to the nature of the personal information to protect the personal information from unauthorized or illegal access, destruction, use, modification or disclosure.

2. Deletion Rights:

You have the right to request that Rausch Sturm delete any personal information about you that we have collected from you. However, this right does not apply where we need to retain the personal information in order to do any of the following:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform a contract between Rausch Sturm and you;
- Help ensure security and integrity to the extent the use of your information is reasonably necessary and proportionate;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 of Title 12 of Part 2 of the Penal Code;
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete such research, if you have provided informed consent;
- To enable solely internal uses that are reasonably aligned with your expectations based on the your relationship with Rausch Sturm and compatible with the context in which you provided the information; or
- Comply with a legal obligation.

Additionally, in the context of our role as a service provider, we are not obligated to comply with requests to delete information which is collected or maintained in our role as a service provider. Furthermore, requests to delete may be denied if deletion could restrict our ability to comply with federal, state or local laws, as well as our ability to exercise or defend legal claims.

Any information collected about you in the act of employment or any hiring stage at Rausch Sturm or associated providers or information necessary to retain for administrative benefits of another person may not be deleted.

If there are no applicable exclusions, once we receive your verifiable consumer request, we will delete any of your personal information which we have collected from you.

3. Correction Rights:

You have the right to request that we maintain accurate personal information about you. If we receive a verifiable request from you to correct inaccurate personal information, we will use commercially reasonable efforts to correct the inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

4. Right to Know What Personal Information is Being Collected:

Rausch Sturm does not and will not sell or share your personal information. You have the right to request that we disclose to you the following:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information was collected.
- The business or commercial purpose for collecting personal information.
- The categories of third parties to whom we have disclosed personal information.
- The specific pieces of information we have collected about you.

If we receive a verifiable request for the above information, we will provide you with the requested information, to the extent that it is different from the below general information, and to the extent that we are otherwise obligated to comply with the request:

- Categories of personal information we collect:
 - personal identifying information, like name, address and account number, as well as other identifying information, which we obtain from the consumer's creditor, credit reports and other skip trace tools, and the consumer;
 - characteristics such as age, gender, etc., which we obtain from the consumer's creditor and consumer's credit report;
 - retail information, which we obtain from the consumer's creditor and the consumer's credit report;

- commercial information, including records of personal property;
- internet activity regarding online payments and account updates, which we collect if the consumer visits our website or payment portal;
- geolocation data, which we obtain from process servers;
- recordings, which are made when the consumer has a telephone conversation with us;
- professional and employment related information, which we obtain from the consumer's creditor, credit reporting agencies, the consumer, and other skip trace sources; and
- educational information, which we obtain from the consumer's creditor, credit reporting agencies, the consumer, and other skip trace sources.
- We collect personal information from the following categories of sources:
 - Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
 - Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
 - Directly or indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.
 - From third-parties, service providers and contractors that interact with us in connection with the services we perform. For example, from government and/or publicly available data bases.
- We collect personal information only as reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed, or for another disclosed purpose that is compatible with the context in which the personal information was collected. Our business purposes for collecting personal information are as follow:
 - Helping to ensure security and integrity to the extent the use of personal information is reasonably necessary and proportionate for these purposes;
 - Debugging to identify and repair errors that impair existing intended functionality;
 - Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with us.
 - Performing services on our behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments,

providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.

- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufacture for, or controlled by the business.
- Other business or business operational purposes as follows:
 - Debt collection.
 - To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to process a payment, we will use that information to process said payment.
 - To provide you with information or services that you request from us.
 - To provide you with email or text alerts and other notices concerning our services.
 - To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for collections.
 - To carry out our obligations and enforce our rights arising from any contracts entered into between you and our clients, including for collections.
 - To improve our website and present its contents to you.
 - For testing, research, analysis and service development.
 - As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
 - To respond to law enforcement requests and as required by applicable law, court order, governmental regulations, or comply with a court order or subpoena to provide information.
 - As described to you when collecting your personal information or as otherwise set forth in the California Collection Laws.
- We disclose personal information for business purposes to the following categories of third parties:
 - Service providers and contractors.
 - 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.

5. Right to Know What Personal Information is Sold or Shared:

Rausch Sturm does not and will not sell or share your personal information. Rausch Sturm does disclose personal information for business purposes. You have the right to request that we disclose to you, upon our receipt of a verifiable request:

- The categories of personal information we collected about you.
- The categories of personal information that we disclosed for a business purpose
- The categories of persons to whom personal information was disclosed for a business purpose.

We engage certain trusted contractors and service providers to perform functions and provide services to us for a business purpose. We may disclose your personal information with these third parties, but only to the extent necessary to perform these functions and provide such services. The following are the categories of personal information that we have disclosed for a business purpose:

- Personal identifying information
- Characteristic information
- Retail information
- Professional or employment related information

6. Right to Non-Discrimination:

Rausch Sturm will not discriminate against you for exercising any of your rights under the CPRA. Unless permitted by the CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- Retaliate against an employee, applicant, or independent contractor for exercising their rights.

B. Exercising Your Rights

1. Submission:

To exercise the access, deletion, or correction rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 855-517-6279
- Submitting the form located at: www.rauschsturm.com/request-CA

2. Verifiable Request:

A verifiable request may be made by you, by a natural person or a business entity that you have authorized to act on your behalf, or by a person who has the power of attorney or is acting as a conservator for the consumer, and that we can verify using commercially reasonable methods.

You may also make a verifiable consumer request on behalf of your minor child. A verifiable 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.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

3. How We Verify:

To verify your request, we will compare information you provided with the information Rausch Sturm already has. We will match 2-3 identifying, personal information data points to verify the request. We cannot provide you with personal information if we cannot verify your identity or your authority to make the request. If we cannot verify the request, we will notify you.

C. Service Provider

We are both a business and a service provider as those terms are defined by the CPRA. A service provider that is a business shall comply with the CPRA with regard to any personal information that it collects or maintains outside of its role as a service provider. Most of the personal information that we collect or maintain is done in context of our role as a service provider. If we deny your verified request pursuant to this notice because all of the information collected or maintained about you has been pursuant to our role as a service provider, we will provide you with the contact information of the business on whose behalf we collect or maintain the information.

D. Changes to Our Privacy Notice

This Notice was last updated on 01-01-2025. We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will notify you by updating the “last updated” date on this notice.

This communication is from a debt collector.