

Effective Date: 01-01-2025

PRIVACY NOTICE

PURSUANT TO THE IOWA DATA PRIVACY LAW

This Iowa privacy notice (“Notice”) pursuant to the Iowa Data Privacy Law, Iowa Code §715D et seq., (“IDPL”), 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 Iowa (“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 IDPL. Any terms defined in the IDPL 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 IDPL provides consumers with specific rights regarding their personal data. This section describes your rights.

1. **Right of Confirmation:**

You have the right to confirm whether we are processing your personal data and access such personal data.

2. **Right to Deletion:**

You have the right to delete personal data provided by you.

3. **Right to Data Portability:**

You have the right to obtain a copy of your personal data, except as to personal data that is subject to security breach protection, that you previously provided to us in a portable and, to the extent technically practicable, readily usable format that allows you to transmit the data to another controller without hindrance, where the processing is carried out by automated means.

4. **Right to Opt Out:**

You have the right to opt out of the sale of personal data. We do not sell your personal data. If we intend to sell your data, we will provide you with notification of your rights including opt out rights.

B. Our Duties

1. The IDPL requires that we provide you with the following information.

i. **Representations:**

- We have adopted and implemented reasonable administrative, technical, and physical data security practices to protect the confidentiality, integrity, and accessibility of personal data. Such data security practices are appropriate to the volume and nature of the personal data at issue.

- We will not process sensitive data collected from you for a nonexempt purpose without you having been presented with clear notice and an opportunity to opt out of such processing.
 - We will not process personal data in violation of state and federal laws that prohibit unlawful discrimination against you. We will not discriminate against you for exercising any of the consumer rights contained in this chapter, including denying goods or services, charging different prices or rates for goods or services, or providing a different level of quality of goods and services to the consumer.
- ii. Categories of personal data processed by us:
- 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.
- iii. Purpose of processing personal data:
- Helping to ensure security and integrity to the extent the use of personal data 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 data 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 data 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 data or as otherwise set forth in the Iowa collection laws.
- iv. How you may exercise your rights, including the process by which you may appeal our decision with regard to your request:
- When you exercise your rights, we will use commercially reasonable methods for authenticating the identity of the person submitting a request to exercise rights.
 - When you exercise your rights, we will respond without undue delay, which may not be later than 90 days after the date of the receipt of the request. We

may extend the response period once by an additional 45 days when reasonably necessary, taking into account the complexity and number of the consumer's request, so long as we inform you of the extension within the initial 45 day response period, together with the reason for the extension.

- If we cannot take action regarding your request, we must inform you without undue delay of the justification for the inability to take action on the request and provide instructions on how to appeal the decision.
 - We have established an appeal process by which you may appeal any refusal of ours to take action on a request. We will inform you in writing of any action taken or not taken in response to an appeal within 60 days after the date of receipt of the appeal, including a written explanation of the reason or reasons for the decision. If the appeal is denied, we will also provide you with a mechanism through which you may contact the attorney general.
- v. Categories of personal data that we share with third parties:
- Personal identifying information
 - Characteristic information
 - Retail information
 - Professional or employment related information
- vi. Categories of third parties with which we share personal data:
- 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.
- vii. Description of the methods by which consumers can submit requests to exercise their consumer rights:
- Submission: To exercise the access, deletion, correction or appeal rights described above, please submit a verifiable consumer request to us by submitting the submission form located at: www.rauschsturm.com/request-IA.

C. Limitations

The above rights and duties may be limited if any of the following apply:

1. We are both a controller and a processor as those terms are defined by the IDPL. A processor that is a controller shall comply with the IDPL with regard to any personal data that it collects or maintains outside of its role as a processor. Most of the personal data that we collect or maintain is done in context of our role as a processor. 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 processor, we will provide you with the contact information of the business on whose behalf we collect or maintain the information.

2. The IDPL does not apply to:
 - i. The state or any political subdivision of the state;
 - ii. Financial institutions;
 - iii. Affiliates of financial institutions;
 - iv. Data subject to Tit. V of the federal Gramm- Leach- Bliley Act of 1999, 15 U.S.C. § 6801 et seq.;
 - v. Persons who are subject to and comply with regulations promulgated pursuant to Tit. II, subtit. F, of the federal Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191, and Tit. XIII, subtit. D, of the federal Health Information Technology for Economic and Clinical Health Act of 2009, 42 U.S.C. § 17921 - 17954;
 - vi. Nonprofit organizations;
 - vii. Institutions of higher education;
 - viii. Protected health information under HIPAA;
 - ix. Health records;
 - x. Patient identifying information for purposes of 42 U.S.C. §290dd-2;
 - xi. Identifiable private information for purposes of the federal policy for the protection of human subjects under 45 C.F.R. pt. 46;
 - xii. Identifiable private information that is otherwise information collected as part of human subjects research pursuant to the good clinical practice guidelines issued by the international council for harmonization of technical requirements for pharmaceuticals for human use;
 - xiii. The protection of human subjects under 21 C.F.R. pts. 6, 50, and 56.
 - xiv. Personal data used or shared in research conducted in accordance with the requirements set forth in this chapter, or other research conducted in accordance with applicable law.
 - xv. Information and documents created for purposes of the federal Health Care Quality Improvement Act of 1986, 42 U.S.C. §11101 et seq.
 - xvi. Patient safety work product for purposes of the federal Patient Safety and Quality Improvement Act, 42 U.S.C. § 299b-21 et seq.
 - xvii. Information derived from any of the health care- related information listed in this subsection that is de- identified in accordance with the requirements for de-identification pursuant to HIPAA.
 - xviii. Information originating from, and intermingled to be indistinguishable with, or information treated in the same manner as information exempt under this subsection that is maintained by a covered entity or business associate as defined by HIPAA or a program or a qualified service organization as defined by 42 U.S.C. § 290dd-2.
 - xix. Information used only for public health activities and purposes as authorized by HIPAA.

- xx. The collection, maintenance, disclosure, sale, communication, or use of any personal information bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency or furnisher that provides information for use in a consumer report, and by a user of a consumer report, but only to the extent that such activity is regulated by and authorized under the federal Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.
 - xxi. Personal data collected, processed, sold, or disclosed in compliance with the federal Driver's Privacy Protection Act of 1994, 18 U.S.C. § 2721 et seq.
 - xxii. Personal data regulated by the federal Family Educational Rights and Privacy Act, 20 U.S.C. § 1232 et seq.
 - xxiii. Personal data collected, processed, sold, or disclosed in compliance with the federal Farm Credit Act, 12 U.S.C. § 2001 et seq.
 - xxiv. Data processed or maintained as follows: (1) In the course of an individual applying to, employed by, or acting as an agent or independent contractor of a
 - xxv. controller, processor, or third party, to the extent that the data is collected and used within the context of that role. (2) As the emergency contact information of an individual under this chapter used for emergency contact purposes. (3) That is necessary to retain to administer benefits for another individual relating to the individual under subparagraph (1) and used for the purposes of administering those benefits.
 - xxvi. Personal data used in accordance with the federal Children's Online Privacy Protection Act, 15 U.S.C. § 6501 — 6506, and its rules, regulations, and exceptions thereto.
 - xxvii. Pseudonymous data in cases where the controller is able to demonstrate any information necessary to identify the consumer is kept separately and is subject to appropriate technical and organizational measures to ensure that the personal data is not attributed to an identified or identifiable natural person
3. Compliance would restrict our ability to:
- i. Comply with federal, state, or local laws, rules, or regulations.
 - ii. Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local, or other governmental authorities.
 - iii. Cooperate with law enforcement agencies concerning conduct or activity that the controller or processor reasonably and in good faith believes may violate federal, state, or local laws, rules, or regulations.
 - iv. Investigate, establish, exercise, prepare for, or defend legal claims.
 - v. Provide a product or service specifically requested by a consumer or parent or guardian of a child, perform a contract to which the consumer or parent or guardian of a child is a party, including fulfilling the terms of a written

warranty, or take steps at the request of the consumer or parent or guardian of a child prior to entering into a contract.

- vi. Take immediate steps to protect an interest that is essential for the life or physical safety of the consumer or of another natural person, and where the processing cannot be manifestly based on another legal basis.
- vii. Prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or any illegal activity.
- viii. Preserve the integrity or security of systems.
- ix. Investigate, report, or prosecute those responsible for any such action.
- x. Engage in public or peer- reviewed scientific or statistical research in the public interest that adheres to all other applicable ethics and privacy laws and is approved, monitored, and governed by an institutional review board, or similar independent oversight entities that determine the following: (1) If the deletion of the information is likely to provide substantial benefits that do not exclusively accrue to the controller. (2) The expected benefits of the research outweigh the privacy risks. (3) If the controller has implemented reasonable safeguards to mitigate privacy risks associated with research, including any risks associated with re- identification.
- xi. Assist another controller, processor, or third party with any of the obligations under this subsection.
- xii. Collect, use, or retain data as follows: a. To conduct internal research to develop, repair products, services, or technology. b. To effectuate a product recall. c. To identify and repair technical errors that impair existing or intended functionality. d. To perform internal operations that are reasonably aligned with the expectations of the consumer or reasonably anticipated based on the consumer's existing relationship with the controller or are otherwise compatible with processing data in furtherance of the provision of a product or service specifically requested by a consumer or parent or guardian of a child or the performance of a contract to which the consumer or parent or guardian of a child is a party.
- xiii. Provide personal data concerning a consumer to a person covered by an evidentiary privilege under the laws of the state as part of a privileged communication.
- xiv. Protect the privacy or other rights or freedoms of any persons, such as exercising the right of free speech pursuant to the first amendment to the United States Constitution, or applies to personal data by a person in the course of a purely personal or household activity.
- xv. Process personal data to the extent that such processing is as follows: a. Reasonably necessary and proportionate to the purposes. b. Adequate, relevant,

and limited to what is necessary in relation to the specific purposes listed in this section.

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.