

Effective Date: 01-01-2023

PRIVACY NOTICE

PURSUANT TO THE VIRGINIA CONSUMER DATA PRIVACY ACT

This Virginia privacy notice (“Notice”) pursuant to the Virginia Consumer Data Protection Act 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 Virginia (“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 Virginia Consumer Data Protection Act of 2021 (“VCDPA”) and other applicable Virginia privacy laws (collectively, “Virginia Privacy Laws”). Any terms defined in the Virginia Privacy Laws 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. Categories of Personal Data Processed

We collect information that is linked or reasonably linkable to an identified or identifiable natural person (“personal data”). Personal data does not include de-identified data or publicly available information. In particular, we have collected the following categories of personal data from consumers:

- 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;
- 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 will always limit collected information, and categories of collected information, to what is reasonably necessary to perform any internal operations.

B. Purposes for Processing of Personal Data

We may use or disclose the personal data we collect for one or more of the following business purposes:

- 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 Virginia Privacy Laws.

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

C. Exercising Your Rights

To exercise your rights set forth in this Notice, please submit a verifiable consumer request to us by either:

- calling us at 855-517-6279
- submitting the form available at: www.rauschsturm.com/privacy-VA

Only you may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The 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.

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 that the request came from the consumer. 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.

If you are dissatisfied with our response to your request, you may appeal by calling us at 855-517-6279 or by clicking the “Appeal” selection of the submission form at: www.rauschsturm.com/privacy-VA.

D. Categories of Personal Data Disclosed

A processor processes personal data on behalf of us. A third party is an entity other than you, Rausch Sturm, an affiliate of Rausch Sturm or a processor. We engage certain trusted third parties to perform functions and provide services to us for a business purpose. We may share your personal information with these third parties, but only to the extent necessary to perform these functions and provide such services. We also require these third parties to maintain the privacy and security of the personal data they process on our behalf.

We have disclosed the following categories of personal data for a business purpose:

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

E. Categories of Third Parties

We disclose personal data for business purposes to the following categories of third parties:

- 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.

F. Consumer Rights

Subject to certain limitations and exemptions outlined in Virginia Privacy Laws, consumers are provided with specific rights regarding their personal data. This section describes your rights.

1. Confirmation Rights:

You have the right to confirm whether or not we are processing your personal data and to access such personal data.

2. Correction Rights:

You have the right to request correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data.

3. Deletion Rights:

You have the right to request that Rausch Sturm delete personal data provided by or obtained about you.

4. Data Portability Rights:

You have the right to request Rausch Sturm provide you with a copy of your personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another business.

5. Processing of Personal Data

Virginia Privacy Laws provide for the right to opt out of the processing of your personal data for (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. However, Rausch Sturm does not and will not process your personal data for any of the reasons outlined in the preceding sentence.

G. 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 updating the “last updated” date on this Notice.

This communication is from a debt collector.