

# CALIFORNIA ONLINE PRIVACY POLICY

Last Updated: June 16, 2020

## Introduction

Account Control Technology, Inc., Convergent Outsourcing, Inc., Convergent Healthcare Recovery, Inc., (“Company” or “we,” “our” or “us”) are providing our consumers who are California residents with this “CA Online Privacy Policy,” which contains information about our privacy practices and your rights under California law, including when you use [www.convergentusa.com](http://www.convergentusa.com), [www.convergenthelp.com](http://www.convergenthelp.com), [www.accountcontrol.com](http://www.accountcontrol.com) or [www.accountcontrolholdings.com](http://www.accountcontrolholdings.com) (collectively referred to herein as the “Site”). More information about the CA Privacy Policy applicable to our Site is available at: [[www.convergentusa.com/outsourcing](http://www.convergentusa.com/outsourcing)].

The purpose of our CA Online Privacy Policy is to provide consumers with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of consumers regarding their personal information.

## Categories of Personal Information Collected in the Past 12 Months

“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 consumer or household.

In the past 12 months, we have collected the following categories of Personal Information:

- Identifiers, including first and last name, home address, email address, phone number, Social Security number, or other similar identifiers.
- Professional or employment information, or other affiliated company names.
- Account information, including account number and online account information.
- Financial information, including bank account and payment card information.
- Audio, electronic, visual, or similar information.
- Internet or other electronic network activity information, including, but not limited to, your IP address, unique device identifier, device functionality (including browser, operating system, hardware, mobile network information), your device location, your device characteristics, the time of day you visit our Site, the URL that referred you to our Site, browsing history, search history, and information regarding your interaction with our Site, application, or advertisements, including the areas within our Site that you visit and your activities there.
- Any other information that identifies, relates to, describes, is reasonably capable of

being associated with, or could be reasonably linked, directly or indirectly, with you or your household.

## **Categories of Sources from which Personal Information is Collected**

We collect Personal Information about you from the following categories of sources:

- From you when you voluntarily provide Personal Information to us.
- Our clients who have engaged us to provide services, including financial institutions from whom you have obtained financial products or services.
- Third parties; such as skip tracers, data brokers and government entities; that provide us with outside records about you to supplement the Personal Information we collect directly from you.
- Our third-party service providers that may collect Personal Information about you on our behalf or provide us with Personal Information to support our activities, including payment processors.
- Third parties that support our Site and Internet activities, including advertising networks, internet service providers, data analytics providers, operating systems and platforms, and social networks. This information may be compiled from tracking technologies, such as cookies, web beacons, embedded scripts, browser fingerprinting, ETags, and recognition technologies.
- From other consumers that may have provided us with your Personal Information.

## **Business or Commercial Purposes for Collecting Personal Information**

We may use your Personal Information for the following purposes:

- To provide you with information, such as to send you electronic notices and communications or updates.
- To perform services, including maintaining or servicing accounts, providing customer service, verifying customer information, processing payments, and obtaining information for debt collection purposes.
- To improve the Site, our marketing endeavors, or our product / service offerings.
- To customize your experience with us, including serving you specific content that we believe is relevant to you.
- To help us collect a debt on behalf of one of our clients.
- To contact you with regard to your use of the Site and/or customers relationship, and, in our discretion, changes to our policies.
- To improve your overall experience with us.
- To audit related to our current interactions with you and concurrent transactions, including, but not limited to, quality assurance, and auditing compliance with this policy and other internal and legal standards.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or

illegal activity, and prosecuting those responsible for that activity.

- To debug to identify and repair errors that impair existing intended functionality.
- To undertake internal research for technological development and demonstration.
- To undertake activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance our services or devices.
- For internal business purposes.
- For our operational purposes that are reasonably necessary and proportionate to achieve the operational purpose or is compatible with the context in which the Personal Information was collected.
- To comply with federal, state, or local laws.
- To comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.
- To cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believes may violate federal, state, or local law.
- To exercise or defend legal claims.
- To protect the safety, rights, property or security of you, us, or any third party.
- To detect, prevent, or otherwise address fraud, security, or technical issues.
- To conduct any other legitimate business activities not otherwise prohibited by law.
- For purposes disclosed at the time you provide your Personal Information to us.
- For any purpose for which you have provided consent.

## **Categories of Personal Information Disclosed for a Business Purpose in the Past 12 Months**

We may have disclosed your Personal Information to third parties for the following business purposes:

- To our service providers to perform services on our behalf.
- For any purpose for which you have provided consent.
- When you request that we provide Personal Information to third parties.
- To comply with federal, state, or local laws.
- To comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.
- To cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believes may violate federal, state, or local law.
- To exercise or defend legal claims.
- To protect the safety, rights, property or security of you, us, or any third party.
- To detect, prevent, or otherwise address fraud, security, or technical issues.
- To conduct any other legitimate business activities not otherwise prohibited by law.
- For purposes disclosed at the time you provide your Personal Information to us.

We reserve the right to disclose and transfer Personal Information to: (i) a subsequent owner, co-owner or operator; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate

change or transaction, including, during the course of any due diligence process.

## **Categories of Personal Information Sold in the Past 12 Months**

We do not sell Personal Information, and we will not sell Personal Information except as described in this CA Online Privacy Policy or if we provide you with notice and a right to opt-out of such sale.

We do not sell the Personal Information of California consumers, including consumers that are less than 16 years of age, unless the consumer (in the case of consumers between 13 and 16 years of age) or the consumer's parent or guardian (in the case of consumers who are less than 13 years of age) has affirmatively authorized the sale of the consumer's Personal Information.

## **Consumer Rights & Methods for Submitting Requests**

Under the California Consumer Privacy Act, California residents have the right to:

- Request that a business delete any Personal Information about the consumer which the business has collected from the consumer.: We are required to keep your data due to the underlying contractual relationship between you and the creditor. We are also required to keep the personal information for legal reasons for as long as the statute of limitations period lasts for the type of account in collections and for other statutory obligations which sometimes are longer (such as a state licensing statute requiring us to maintain records for a certain period of time or the statute of limitations for a consumer financial law). Once our legal obligation to keep your personal information has expired, we delete the information from our systems in accordance with our data retention policies and procedures.
- Request that a business that collects Personal Information about the consumer disclose to the consumer, free of charge, the following:
  - The categories of Personal Information that it has collected about that consumer.
  - The categories of sources from which the Personal Information is collected.
  - The business or commercial purpose for collecting or selling Personal Information.
  - The categories of third parties with whom the business shares Personal Information.
  - The specific pieces of Personal Information it has collected about that consumer.

To submit a request to exercise any of these consumer rights, please contact us via the entity you are choosing to request information from:

For Account Control Technology, Inc: (ACT):

- ACT Website:
  - [www.accountcontrol.com](http://www.accountcontrol.com)

- Select Contact Us
- ACT Email Address: [relief@accountcontrol.com](mailto:relief@accountcontrol.com)

For Convergent Outsourcing, Inc. (COI)

- COI Website: [www.convergentusa.com/Outsourcing](http://www.convergentusa.com/Outsourcing)
  - Select Contact Us
- COI Email Address: [#clerks@convergentusa.com](mailto:#clerks@convergentusa.com)

For Convergent Healthcare Recoveries, Inc (CHRI)

- CHRI Website: <https://www.convergentusa.com/v1/healthcare/>
  - Select Contact Us
- [chrmanagement@convergentusa.com](mailto:chrmanagement@convergentusa.com)

To protect your privacy, we must verify that the person making a request is actually you. In order to verify your identity to a reasonable degree of certainty, we will match the Personal Information that you provide to us with your request to the Personal Information that we already maintain about you. We may need to request that you provide us with the following additional Personal Information:

- First and Last Name
- Current Mailing Address,
- and one of the following:
  - Last four numbers of the Social Security Number
  - Client or Agency Reference Account Number

You may also designate an authorized agent to make such requests on your behalf by providing us with written permission, signed by you, designating the authorized agent to make requests on your behalf.

We will not discriminate against you if you choose to exercise any of your rights as described in this section.

## **Contact Information**

For questions or concerns about our privacy policies and practices, please refer to requests for information section to submit questions or concerns.

**This California Online Privacy Policy will be updated at least once every 12 months, so please be sure to check back regularly for the latest information.**