Hunt & Henriques Privacy Policy

This Privacy Policy describes Hunt & Henriques, LLP's ("us," "our," or "Hunt & Henriques") privacy practices. To obtain a copy of this Privacy Policy in an alternative format please phone us at 1-866-625-9835 or email us at privacy@hunthenriques.com.

Notwithstanding anything contained within this Privacy Policy, and as to debtors, Hunt & Henriques is a debt collector attempting to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

PERSONAL INFORMATION WE COLLECT

AS A COURTESY, THESE DISCLOSURES INCLUDE INFORMATION THAT IS EXEMPT FROM CALIFORNIA CONSUMER PRIVACY ACT ("CCPA"). THE COURTESY DISCLOSURES ARE MADE WITH A RESERVATION OF ALL RIGHTS.

<u>Categories of Personal Information We Collect</u>: We collect the following categories of personal information from the specified sources:

- "Sensitive Personal Information" such as social security number; driver's license; state identification card; passport number; a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; health data (obtained from a person's creditor, credit reports, third-party data providers, and/or the consumer);
- "Identifiers" such as name, alias, postal address, unique personal identifier, online identifier, IP address, telephone number, social security number, account number, email address, signature, physical characteristics or description, passport number, driver's license or state identification card number; insurance policy number; education, employment, or employment history; bank account number, credit card number, debit card number, or any other financial information; medical information; or health insurance information (obtained from a person's creditor, credit reports, third-party data providers, and/or the consumer);
- "Health Information" such as health insurance information and medical diagnosis (if the debt is a medical debt, obtained from a person's creditor and/or the consumer);
- "Protected Characteristics" that are protected under California law such as age (40 years or older); race; sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions); marital status; medical condition; veteran or military status (obtained from credit reports, a person's creditor, and/or the consumer);
- "<u>Commercial Information</u>" such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, or retail information (obtained from credit reports and/or a person's creditor);
- "Internet or Network Activity" such as browsing history, search history, and information regarding a
 consumer's interaction with our website as discussed below in the section titled <u>Cookies</u> (obtained
 from the consumer's access of our websites and/or payment portal);
- "<u>Financial Information</u>" such as banking information, financial account numbers, and payment history (obtained from a person's creditor, credit reports, third-party data providers, and/or the consumer);

- "Geolocation Information" such as geolocation data (including GPS coordinates), location information (obtained from process servers if there is a lawsuit filed, from creditors, and from a consumer's use of our websites and/or payment portal);
- "Sensory Data" such as audio call recordings (obtained when a consumer has a telephone conversation with us);
- "Professional or Employment Related Information" such as current employment, employment history, and salary data (obtained from the consumer's creditor, credit reports, third party data providers, consumer's employer, and/or the consumer);
- "Education Information" such as level of education completed and schools attended (obtained from the consumer's creditor and/or credit reports);
- "Physical Description Information" including physical descriptions of people and photos but we do not
 collect facial scans, biometric identifiers, fingerprints or other forms of traditional "biometric data")
 (obtained from person's creditor, process servers, and/or call recordings with consumers); and
- "Inferences" drawn from other personal information such as profile about a consumer reflecting the consumer's preferences, characteristics, predispositions, behavior, attitudes.

<u>How We Use Personal Information</u>: We collect, use, and disclose personal information for the following purposes:

- Hunt & Henriques is a debt collector and all information that is collected will be used for debt collection purposes. (This use does not apply to our business-to-business connections.)
- Performing services such as maintaining, servicing, and/or collecting on accounts on behalf of creditors.
- Verifying debtor information and processing payments.
- Report collections to creditors and process back-end billing with credits.
- To carry out our contractual obligations or to pursue the contractual rights of creditors.
- To market our business-to-business services.
- Undertaking internal research for technological development and demonstration.
- Debugging to identify and repair errors that impair existing intended functionality.
- Helping to ensure security and integrity to the extent the use of personal information is reasonably necessary and proportionate for these purposes.
- Short-term, transient use, provided the 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 the business.
- Undertaking activities to verify or maintain the quality or safety of a service, system, or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
- To comply with our legal or regulatory obligations.

<u>How We Disclose Personal Information</u>: We disclose personal information to service providers, contractors, and/or third parties. When we disclose personal information to a service provider or contractor, we enter a contract that describes the purpose and requires the service provider to keep that

personal information confidential and not use it for any purpose except performing the contract or as otherwise allowed under applicable law. We disclose personal information as follows:

- With <u>our clients and other attorneys retained by our clients</u>, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Internet and Network Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.
- With <u>account servicing systems</u>, <u>wire transfer vendors</u>, <u>payment processors</u>, <u>and fraud prevention vendors</u>, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Internet and Network Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.
- With shipping providers and process servers, we disclose Identifiers and Other Personal Information.
- With our <u>data analytics</u>, <u>network monitoring services</u>, <u>and incident response providers</u>, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Internet and Network Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.
- With word processing, communication applications, and calendar providers, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Financial Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.
- With our <u>advisors</u> such as lawyers, accountants, auditors, banks/lenders, insurers, and consultants, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Internet and Network Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.
- With our government and regulatory agencies, we disclose Sensitive Personal Information, Identifiers,
 Health Information, Protected Characteristics, Commercial Information, Internet and Network
 Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment
 Related Information, Education Information, Physical Description Information, and Inferences.
- With <u>law enforcement</u>, government entities, courts, and pursuant to <u>legal process</u> where required by law, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Internet and Network Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.
- As part of <u>business transfers or mergers</u>, we disclose Sensitive Personal Information, Identifiers, Health Information, Protected Characteristics, Commercial Information, Internet and Network Activity, Financial Information, Geolocation Information, Sensory Data, Professional or Employment Related Information, Education Information, Physical Description Information, and Inferences.

How Long We Retain Personal Information:

Based on contractual requirements and/or legal requirements, personal information is maintained for a specified period of time, as required by legal, regulatory, or industry requirements. Additional information such as emails and vendor agreements are maintained for business purposes for an indefinite amount of time.

Employees / Former Employees / Applicants:

If you are an employee, former employee, owner, officer, director, emergency contact, beneficiary, or job applicant with Hunt & Henriques, please visit our California Employee and Applicant Privacy Policy for information on your rights and how to exercise those rights. This information was previously provided to you in relation to your employment or application for employment.

YOUR RIGHTS UNDER THE CCPA

The CCPA provides California residents with specific rights regarding their personal information - the Right to Know, the Right to Delete, the Right to Correct, the Right to Limit use of Sensitive Personal Information, the Right to Opt-Out of the Sale of Personal Information or Sharing of Personal Information, and the Right to Non-Discrimination. This section describes your CCPA rights and explains how to exercise those rights, if applicable.

<u>Right to Know</u>: the right to request that we disclose the personal information we collect:

- <u>Categories of Personal Information</u>: the categories of personal information we collect, the sources from which personal information is collected, the purpose for collecting the personal information, the categories of third parties with whom we disclose personal information and the corresponding categories of personal information, and the categories of personal information that we sell or share (if applicable); or
- Specific Personal Information: The specific pieces of personal information we have collected.

<u>Right to Delete</u>: the right to request that we delete personal information about them.

Right to Correct: the right to request that we correct personal information about them.

<u>Right to Opt Out</u>: the right to opt out of the sale or "sharing" of personal information. ("Sharing" means the disclosure of personal information for cross-contextual behavioral advertising.) However, we do not sell or "share" personal information. We do not knowing sell or "share" the personal information of minors under 16 years of age without affirmative authorization

<u>Right to Non-Discrimination</u>: We will not discriminate against consumers for exercising their rights under the CCPA.

Right to Limit the Use of Sensitive Personal Information:

You have the right to direct a business that collects your sensitive personal information to limit its use to uses which are necessary to perform the services or provide the goods reasonably expected. However, we only use Sensitive Personal Information as exempt from the CCPA; to provide the goods and services requested by you; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for such actions; to ensure people's physical safety; to perform services on our behalf; to verify or maintain the quality or safety of our products, services, and devices

<u>How to Submit a Request</u>: to make a privacy request on behalf of yourself, or as an authorized agent for a consumer, please call us at 1-866-625-9835, email us at <u>privacy@hunthenriques.com</u>, or <u>fill out this</u> form.

Once we receive your request, we will verify your identity. If we can verify the request, we will respond within 45 days. To verify, we will match personal information from the request with what we have on file. If we cannot verify that the request came from the consumer, we will notify the consumer.

To designate an authorized agent, we require either a power of attorney or written authorization from the consumer. We will need to verify the authorized agent's identity as well.

<u>Retention of Personal Information</u>: Based on contractual requirements and/or legal requirements, personal information is maintained for a specified period of time. Additional information such as emails and vendor agreements are maintained for business purposes for an indefinite amount of time.

COOKIES AND WEBSITE TECHNOLOGY

We receive and store certain types of information when you interact with us online. For example, like many websites, we use "cookies," and we obtain certain types of information when your web browser accesses the www.hunthenriques.com website and other content served by or on behalf of Hunt & Henriques on other websites. Please see below for a list of examples.

Cookies

Cookies are unique identifiers that we transfer to your device to enable our systems to recognize your device. Examples of the information collected or disclosed as a result of cookies includes browser type, version, and time zone setting, browser plug-in types and versions, operating system, and platform; the full Uniform Resource Locator (URL) clickstream to, or through, and from our website, including date and time; cookie number; and previous interactions with the www.hunthenriques.com website. We may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our website for fraud prevention and other purposes. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.

The Help and Settings features on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-on's settings or visiting the website of its manufacturer.

SOCIAL MEDIA OR REVIEW SITES

We encourage you to review your privacy options and settings with the social media platforms, websites used to leave reviews, and networks you use to understand what choices you have about disclosing your information through those platforms, sites, and networks.

DO NOT TRACK

Our site does not respond to "Do Not Track" signals.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make material changes to this privacy policy, we will post it on our website. We will not email or otherwise send

you personal notification of such changes, so we recommend that you check our website frequently to see recent changes.

HOW TO CONTACT US

If you have any questions or comments about this policy, the ways in which we collect and use your personal information, your rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

This privacy policy was last updated on August 21, 2025.

HUNT & HENRIQUES PRIVACY NOTICE PURSUANT TO THE CALIFORNIA CONSUMER PRIVACY ACT ADDRESSED TO EMPLOYEES AND APPLICANTS

(To obtain a copy of this notice in an alternative format please phone us at 1-866-625-9835 or email us at privacy@hunthenriques.com. You can also download a PDF file of this notice here.)

The California Consumer Privacy Act as amended by the California Privacy Rights Act requires that we disclose the categories of personal information we typically collect and use in the context of a person's role as a job applicant or employee. We typically collect the following categories of information from you and others as noted:

- Identifiers such as personal identifying information, including, but not limited to name, address, telephone number, social security number, email address, driver's license number, bank account information, as well as other identifying information from you, your creditor, credit reports and/or third= party data providers;
- Personal information as defined in the California Customer Records Act, Cal. Civ. Code Section 1798.80 such as contact information, health information, insurance information, financial information, results of drug testing and criminal background information.
- Protected classifications under California or federal law such as age, race, color, citizenship, marital status, gender, etc. from you and providers of background checks:
- Internet or similar activity information such as IP address from your browsing history, search history, information on an interaction with websites and applications;
- Geolocation data such as device location if you work remotely;
- Audio, electronic, visual or similar information such as call and video recordings;
- Biometric information such as genetic, physiological, behavioral and biological characteristics or activity patters or other identifying information such as fingerprints, voiceprints, photos or other physical patters;
- Professional and employment related information from you and/or third-party data providers;

- Educational information from you and/or third-party data providers;
- Information such as work history and performance evaluations; and
- Certain inferences concerning an individual's preferences, abilities, aptitudes and characteristics

We collect personal information relating to employees and applicants who are California residents in a variety of contexts, including in connection with applications for employment, Human Resource activities and job-related activities. The categories of personal information that we collect and use about a California resident will depend on our specific relationship or interaction with that individual, and the examples provided in each category above are for illustrative purposes only.

Purposes for Which We Use Personal Information:

We may use personal information relating to employees and applicants who are California residents for one or more of the following business purposes:

- Evaluating employment applications and employee performance
- Providing and maintaining our employee related services
- Conducting background checks
- Protecting against security risks
- Conducting research and data analysis
- Maintaining our facilities, systems, and infrastructure
- Improving our employee related services
- Carrying out our legal and business purposes, such as complying with federal, state, or local laws, responding to civil, criminal, or regulatory lawsuits or investigations, exercising our rights or defending against legal claims, resolving complaints and disputes, performing compliance activities, performing institutional risk control, and otherwise operating, managing, and maintaining our business
- As otherwise disclosed to you at or before the point of collecting your personal information

We may also use personal information relating to California residents for one or more of the specific "business purposes" listed in the California Consumer Privacy Act as amended by the California Privacy Rights Act:

- Auditing related to an employee
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use
- Performing services on behalf of clients or their service providers, including
 maintaining or servicing employees' accounts, providing employees service,
 processing or fulfilling orders and transactions, verifying employees or applicant's
 information, processing payroll, or providing similar services on behalf of Hunt &
 Henriques law firm or its service providers

- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service that is owned or controlled by Hunt & Henriques and to improve, upgrade, or enhance the service that is owned or controlled by our clients.

Changes to This Privacy Disclosure

We may change or update this Privacy Disclosure in the future. When we do, we will post the revised Privacy Disclosure to Employees and Applicants on our website and on The Control List. This Privacy Disclosure was last updated and became effective on August 21, 2025.