

## Privacy Policy

Version 2021.7, December 20, 2021.

Please carefully read this Privacy Policy in order to understand how we will treat the personal information that you provide to us or that we collect from you while you are visiting our web sites; contacting us via mail, email, telephone, fax or instant message; or obtaining products or services from us. Capitalized terms used herein are defined in Section 2, DEFINITIONS. **California residents should see Section 10 for a notice of their rights under the California Consumer Privacy Act of 2018 (“CCPA”).**

### 1. WHO WE ARE

Stretto, Inc.; its wholly-owned subsidiary Credit Infonet, Inc. d/b/a CIN Legal Data Services; and Credit Infonet, Inc.’s wholly-owned subsidiary, Best Case, LLC (collectively referred to hereafter as, “STRETTO”) are the leading providers of information services, software, due diligence products, and practice management solutions. STRETTO offers Consumers and Customers a comprehensive portfolio of innovative products, services and tools that assist in the accurate, efficient, and cost-effective preparation of consumer law cases. STRETTO’s web sites include [www.\\*stretto.com\\*](http://www.*stretto.com*), [app\\*.bestcase.com](http://app*.bestcase.com), [www.cingroup.com](http://www.cingroup.com), [www.cinlegal.com](http://www.cinlegal.com), [www.cincompass.com](http://www.cincompass.com), [www.bestcase.com](http://www.bestcase.com), [www.mycaseinfo.com](http://www.mycaseinfo.com), [www.myhorizontoday.com](http://www.myhorizontoday.com), and all of the web pages and subdomains thereof (“Stretto Sites” and “Sites”). STRETTO also offers Customers bankruptcy forms preparation software including Best Case® Bankruptcy and CINcompass® and trustee practice management software including Trustee Suite™ (collectively, “Stretto Software” and “Software”).

**A. Consumer Reporting Agency.** STRETTO’s wholly-owned subsidiary Credit Infonet, Inc. (“Credit Infonet”) is by definition a consumer reporting agency (CRA) operating in accordance with the requirements of the federal Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq. Credit Infonet resells consumer credit data that is maintained by the national CRAs: Experian®, TransUnion® and Equifax®. To view the Privacy and Opt Out Notice for Credit Infonet, Inc., please visit [www.stretto.com/legal-policies/](http://www.stretto.com/legal-policies/) and click on *Consumer Privacy and Opt Out Notice*.

The FCRA establishes the following principles for all CRAs:

- (i) **Privacy:** A CRA may furnish information from your personal credit profile to a Third Party only if (a) that Third Party has a permissible purpose to receive such information, and (b) you have given the CRA “written instructions” authorizing the CRA under Section 604(a) (2) of the Fair Credit Reporting Act (15 U.S.C. §1681 et. seq.) to obtain your personal credit profile from one or more of the national credit bureaus and provide it to the Third Party.
- (ii) **Access:** Consumers may receive a copy of information a CRA maintains about them. Such reports can be obtained free of charge once per year or for a reasonable fee for additional disclosures. Please visit the following website to obtain more information: [www.annualcreditreport.com](http://www.annualcreditreport.com).
- (iii) **Accuracy:** CRAs must follow reasonable procedures to assure accuracy of the information they maintain and furnish. When you obtain a copy of

your information, you have a right to dispute and have the information reinvestigated and corrected in the CRA's database.

- (iv) **Fairness:** CRAs obtain their information from various sources including public records and direct reports from creditors. The FCRA establishes periods for how long a CRA can report certain types of negative credit data and activity.
- (v) **Accountability:** The Consumer Financial Protection Bureau is charged with overseeing the operations of CRAs and enforcing FCRA requirements.

**B. Security Commitment.** STRETTO is committed to security. Safeguarding the privacy of non-public personally identifiable information we receive is a top priority. Keeping your information secure is very important to us. We employ electronic, physical, and procedural safeguards and best practices to protect your information. However, we cannot guarantee that your information will never be unlawfully intercepted or accessed.

**C. Intended Audience.** The Sites and STRETTO's products and services are intended for the exclusive use of citizens of the United States of America who are 18 or older and other individuals who meet all of the requirements set out in 11 U.S.C. § 109 for being a debtor in a Chapter 7, 11, 12, or 13 bankruptcy. Neither the Sites nor STRETTO's products and services are intended for use by non-U.S. citizens, including but not limited to identifiable natural persons who are citizens of a Member State of the European Union. In addition, neither STRETTO's Sites nor STRETTO's products and services are intended for children, and STRETTO does not knowingly collect any information about children. STRETTO defines a child as any individual under the age of eighteen (18).

## 2. DEFINITIONS

**"Affiliates"** mean companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include nonfinancial companies such as Best Case LLC and Second Bankruptcy Course, LLC; and financial companies such as Stretto, Inc.

**"Aggregate"** and **"Aggregated"** both mean information relating to a group or category of Consumer, Clients or Customers from which the identities of individual persons have been removed and that is not linked to or reasonably linkable to any Consumer, Client, Customer or household, including via a device. Neither "Aggregate" nor "Aggregated" consumer information means one or more individual Consumer, Client or Customer records that have been Deidentified.

**"Case Data"** means a Client's PII that a Customer has input into or caused to be imported into a Stretto Software program. Case Data includes but is not limited to the Client's petition and schedules; bankruptcy forms, plans, claims register, and other pleadings or filings; and other case-related or consumer-related information, documents, and data. Case Data can include Filed Data or Non-Public Data.

**"Client"** means a natural person who is 18 years of age or older, who resides in the United States of America or its territories, who is not a citizen of any country that is a member of the European Union and who either consults one of our Customers for legal services or has a bankruptcy case assigned to one of our Customers as trustee.

**“Consumer”** means a natural person who is 18 years of age or older, who resides in the United States of America or its territories, who is not a citizen of any country that is a member of the European Union and who either accesses one of the Stretto Sites via the Internet or orders STRETTO products and/or services solely for the Consumer’s own personal, family or household purposes.

**“Customer”** means a licensed attorney or bankruptcy trustee and their respective employees who have a continuing relationship with STRETTO by virtue of activating an account at a Stretto Site, ordering or using products or services through the Stretto Sites, and/or using Stretto Software.

**“Deidentified”** means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular Consumer, Client or Customer, provided that a business that uses said Deidentified information: (a) has implemented technical safeguards that prohibit reidentification of the Consumer, Client or Customer to whom the information may pertain; (b) has implemented business processes that specifically prohibit reidentification of the information; (c) has implemented business processes to prevent inadvertent release of Deidentified information; and (d) makes no attempt to reidentify the information.

**“Filed Data”** means Case Data that has been filed with the United States Bankruptcy Court using Stretto Software and is publicly available via a PACER search.

**“Former Customer”** means a Customer who no longer has an active account at a STRETTO Site. We may share the PII collected from Former Customers in accordance with the terms stated in this Policy.

**“Joint Marketing”** means a formal agreement between nonaffiliated financial companies that together market financial products or services to Customers or Consumers.

**“Nonaffiliates”** means companies not related by common ownership or control. Nonaffiliates may be either financial service providers such as the national credit bureaus; or non-financial companies such as bankruptcy forms preparation software vendors, non-profit organizations approved by the U.S. Dept. of Justice to administer the consumer credit counseling courses required under current bankruptcy law, third-party service providers such as Google Analytics, and third-party entities who may purchase Deidentified or Aggregate data from STRETTO for their own market research and marketing purposes.

**“Non-Public Data”** means (a) a Consumer’s PII that is not available to the general public; and (b) Case Data that has not yet been filed with the United States Bankruptcy Court and is not otherwise available to the general public from government records.

**“Personally Identifiable Information”** and **“Personal Information”** (collectively, **“PII”**) mean all information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly with a particular Consumer or household. PII can be either Publicly Available Data or Non-Public Data.

**“Products”** mean products sold by Stretto’s wholly owned subsidiary Credit Infonet, Inc. d/b/a CIN Legal Data Services, including but not limited to federal income tax transcripts, real property appraisal products and consumer credit report products.

**“Publicly Available Data”** means data that is available to the general public, including but not limited to a Consumer’s PII that is lawfully available to the general public from government records.

**“Sites”** and **“Stretto Sites”** mean STRETTO’s websites, including [www.\\*stretto.com\\*](http://www.*stretto.com*), [app\\*.bestcase.com](http://app*.bestcase.com), [www.cingroup.com](http://www.cingroup.com), [www.cinlegal.com](http://www.cinlegal.com), [www.cincompass.com](http://www.cincompass.com), [www.bestcase.com](http://www.bestcase.com), [www.mycaseinfo.com](http://www.mycaseinfo.com), and [www.myhorizontoday.com](http://www.myhorizontoday.com).

“Software” and “Stretto Software” mean STRETTO’s bankruptcy forms preparation software programs including Best Case® Bankruptcy, Best Case Cloud Solution™, and CINcompass®, and its trustee practice management software programs Trustee Suite Cloud™ and Trustee Suite Desktop™.

“STRETTO” and “Stretto Companies” means Stretto, Inc.; its wholly owned subsidiary Credit Infonet, Inc. d/b/a CIN Legal Data Services; and Credit Infonet, Inc.’s wholly owned subsidiary, Best Case, LLC.

“Visitor(s)” means any individual who accesses one of the STRETTO Sites via the Internet.

### 3. PERSONAL INFORMATION WE COLLECT VIA SITES

**A. Information Collected.** STRETTO may collect and track the following information when Visitors, Consumers, Customers and/or Clients visit one of our Sites: **(i)** their home server domain name, type of computer, and the type of Web browser they are using; **(ii)** the Internet Protocol Address of their computer; **(iii)** information they knowingly provide to STRETTO on the Sites (including demographic and personal profile data such as name, postal address, email address and phone number), for example by filling out online order forms, registration forms, surveys, or contest entries; **(iv)** aggregate and user-specific information on which pages of the Sites they accessed and their activities on our Sites through the use of electronic technologies such as cookies; **(v)** information they knowingly provide to STRETTO when purchasing Products on the Sites; and **(vi)** information about their transactions with us, our affiliated companies, or others.

**B. Collection Methods.** STRETTO uses the following to collect personal information via our Sites:

**(i)** We use web site analytics and our web servers automatically collect the domain names, not the e-mail addresses, of visitors to the Sites. STRETTO uses this information to measure to measure the use of our Sites, the number of visits, the average time spent on the Sites, the pages viewed per visit, and similar information, with the goal of developing ideas to improve the content and flow of our Sites.

**(ii)** We use cookies on our Sites to ensure a great browsing experience for you and to show you relevant advertising from us. If you continue to use our website, you are agreeing to us placing cookies on your computer or mobile device (unless you have changed your device or browser settings to prevent this). If you do not allow cookies, then our Sites may not work properly for you. You have the right to delete the cookies placed on your computer or mobile device at any time. However, doing so will prevent our Sites from recognizing you and customizing your experience when you revisit the Sites. For more details on the types of cookies we use on our websites and what they do, please read our Cookie Policy.

**(iii)** We use third-party service providers (hereinafter, “TSP”) to collect data from Visitors, Consumers, Customers and/or Clients who visit our Sites. The following table identifies TSPs we use, describes the information the TSP collects, tells how the TPS uses the collected data, and gives information on each TSP’s opt out procedures.

TSP	What Data Does This TSP Collect?	How Does This TSP Use Collected Data?	TSP’s Opt Out Procedures
Google Analytics <i>including Google</i>	Google Analytics uses cookies to collect information such as how	Google Analytics uses collected information to analyze visitors’ use	If you don’t want Google Analytics to be used in your

<p>Data Studio and Google Tag Manager</p>	<p>often users visit the Sites, what pages they visit when they do so, and what other sites they used prior to coming to the Sites. Google Analytics collects only the IP address assigned to a visitor on the date that visitor visits the Sites. Google Analytics then assigns a user ID code to that visitor. Google does not obtain visitors' names or other identifying information. We use Google Analytics measurement service on our web sites to understand how visitors engage with the Sites. We use anonymized information obtained from Google Analytics to improve our Sites.</p>	<p>of the Sites, to generate reports about Site activities for website operators and to provide further services related to use of the Sites and the Internet. <a href="https://policies.google.com/privacy#intro">Google's Privacy Policy: https://policies.google.com/privacy#intro</a>. How Google Analytics Collects and Processes Data: <a href="https://www.google.com/policies/privacy/partners/">https://www.google.com/policies/privacy/partners/</a></p> <p>How Google Analytics Shares Collected Information: <a href="https://policies.google.com/privacy#infosharing">https://policies.google.com/privacy#infosharing</a></p> <p>How Google Analytics Safeguards Data: <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a></p> <p>For more information on Google Tag Manager's terms of service and privacy policy, please visit <a href="http://www.google.com/analytics/tag-manager/use-policy/">www.google.com/analytics/tag-manager/use-policy/</a>.</p>	<p>browser, you can <a href="#">install the Google Analytics Opt-out Browser Add-on</a> by going to <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.</p>
<p>Google reCAPTCHA</p>	<p>reCAPTCHA collects and evaluates various information about visitors to the sites such as the visitor's IP address, how long the visitor has been on the website, or mouse movements made by the visitor. This analysis starts automatically and takes</p>	<p>For more information about Google reCAPTCHA and Google's privacy policy, please visit the following links: <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a> and_</p>	<p>N/A</p>

	<p>place completely in the background. reCAPTCHA forwards the data collected during the analysis to Google.</p> <p>We use reCAPTCHA to check whether the data entered on the Sites (such as on a contact form) has been entered by a human or by an automated program. To do this, reCAPTCHA analyzes the behavior of the website visitor based on various characteristics.</p>	<p><a href="https://www.google.com/recaptcha/intro/android.html">https://www.google.com/recaptcha/intro/android.html</a></p>	
<p><b>Facebook Tracking Pixel</b></p>	<p>Facebook Tracking Pixel uses data tags and cookies to collect information from a webpage's header, such as a Visitor's IP address or browser, which it then forwards to an advertiser. The advertiser uses the information for the purpose of providing advertising to its customers that is based on the customers' personal interests.</p> <p>We use Facebook Tracking Pixel to monitor how Site Visitors move from one page within our Sites to another, to understand whether Site Visitors have come to our Sites from an online advertisement displayed on a third-party website, to measure how ads have been viewed, and to improve Site performance.</p>	<p>Facebook may link information collected from Site Visitors to those Visitors' Facebook accounts and/or use it for its own promotional purposes, in accordance with Facebook's Data Usage Policy posted at <a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>.</p>	<p>Contact Facebook at the following address to object to the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads: <a href="https://www.facebook.com/settings?tab=ads">https://www.facebook.com/settings?tab=ads</a>.</p>

<p><b>Twitter Tracking Pixel</b></p>	<p>Twitter Tracking Pixel uses data tags and cookies to collect Visitors' IP addresses, track users' web browsing, associate users with certain browsers or devices, and associate Visitors' Twitter accounts with information about users' browsers or devices. Twitter does not associate web browsing history with a Visitor's name, email address, phone number, or Twitter handle.</p> <p>We use Twitter's Conversion Tracking Program to measure the number of Twitter users that perform a desired action after viewing and engaging with our ads on Twitter. It gives us the capability to measure which of our campaigns drive actions such as site visits, sign ups, and purchases.</p>	<p>Twitter's Privacy Policy: <a href="https://twitter.com/privacy?lang=en">https://twitter.com/privacy?lang=en</a></p> <p>How Twitter uses cookies and similar technologies: <a href="https://help.twitter.com/en/rules-and-policies/twitter-cookies#">https://help.twitter.com/en/rules-and-policies/twitter-cookies#</a></p>	<p>If you do not want Twitter to show you interest-based ads on and off of Twitter, there are several ways to turn off this feature: <a href="https://twitter.com/personalization">https://twitter.com/personalization</a></p> <p>If you are online and want to opt out of seeing interest-based advertising from Twitter in your current browser, visit <a href="http://optout.aboutas.info">optout.aboutas.info</a> and <a href="http://www.networkadvertising.org/choices">www.networkadvertising.org/choices</a>.</p>
<p><b>AppDynamics</b> including APM, Database Visibility, and Browser Real User Monitoring Software</p>	<p>AppDynamics collects the following data from Site Visitors who are our customers: STRETTO account number, current time, business name, software serial number, user ID and username.</p> <p>We use AppDynamics' software products to monitor and analyze the performance of our business applications and the databases and infrastructure that support them.</p>	<p>AppDynamics Privacy Policy: <a href="https://www.appdynamics.com/privacy-policy/">https://www.appdynamics.com/privacy-policy/</a></p>	<p>To opt out of interest-based advertising, send an email to <a href="mailto:privacy@appdynamics.com">privacy@appdynamics.com</a>.</p>



**C. How We Use the Information.** STRETTO uses the personal information and other data collected from the Sites for (i) editorial and feedback purposes; (ii) marketing and promotional purposes; (iii) statistical analyses of visitors' behavior; (iv) product development; (v) content improvement; (vi) customization of the content and layout of the Sites; and (vii) contacting you via calls and mailings regarding updates to the Sites, new products and services, and upcoming events.

#### 4. PERSONAL INFORMATION WE COLLECT VIA SOFTWARE

##### A. Information Collected.

(i) STRETTO collects the following personal information whenever Customers use one of our Stretto Software products, whether desktop software or software-as-a-service products: (a) the Software licensee's name and serial number; (b) the Internet Protocol Address of licensee's computer; (c) the identity of the jurisdictions in which licensee is preparing forms using the Software; (d) the package, version and release numbers of the Software and any add-ons installed; (e) the total number of files created by the licensee in the Software; (f) electronic case filing logs that are automatically created by the Software to allow for the maintenance and monitoring of electronic case filing functions; and (g) one or more electronic copies of Filed Data, or data contained in petitions, schedules and forms that Customers have filed with the United States Bankruptcy Courts using the Software's electronic filing interface with PACER.

(ii) STRETTO also collects both Publicly Available and Non-Public Data of Clients that Customers input into or cause to be imported into one of our Software programs. Publicly Available Data can include a Client's full name, address, and real property owned. Non-Public Data has not been filed with the United States Bankruptcy Court, and is not otherwise publicly available information. Such data may include but is not limited to the following: (a) the identity of Client's creditors, the amounts Client owes to creditors, the Client's income, the Client's personal property, any appraisals of the value of Client's real property and any additional assets of, or liens against the property of the Client; (b) additional notes added to the Software by the Customer, which may include details and notes related to a Client, the cases, or a Client's assets, income, creditors, etc. that are not included in a Client's schedules or voluntary petitions; (c) details about claims filed in a Client's cases; and/or (d) Client information manually uploaded into the Software by the Customer.

**B. Collection Methods.** STRETTO collects information from Customers' use of desktop Software like Best Case Bankruptcy whenever Customers use certain features and on-line services of the Software, including but not limited to using the Software to order STRETTO products and services, using the Software's "Check for Updates" feature, and using the Software's electronic filing interface with the United States Bankruptcy Courts. STRETTO collects information from Customers' use of cloud Software as a service like CINcompass and Best Case Cloud Solution whenever Customers are logged in to their accounts.

**C. How We Use the Information.** STRETTO uses Personal Information, Non-Public Data and other data collected from Software in the following ways: (i) to fulfill actions the Software licensee or Customer initiates through the Software, such as electronic case filings and the processing of a Client's credit card payments within the Software; (ii) to provide customer support to licensees or Customers; (iii) to prevent or address service or technical



problems; **(iv)** to comply with any request of a governmental or regulatory body (including subpoenas or court orders); **(v)** to improve and support development of Products and Software; **(vi)** for Product fulfillment purposes; **(vii)** to conduct internal audits for compliance; **(viii)** to conduct secure internal research and development on the Service; **(ix)** to collect, securely store and share with Affiliates and Nonaffiliates both Filed Data and Deidentified or Aggregate Non-Public Data and Case Data for their everyday business purposes and for business development, marketing, and market research purposes; and **(x)** to collect, securely store and sell to Non-Affiliates both Filed Data and Deidentified or Aggregate Non-Public Data and Case Data for general commercial purposes. Please see Section 6 for information on your options for limiting our use and sharing of Personal Information collected via Software.

**5. RESERVED.**

**6. HOW WE USE AND SHARE PERSONAL INFORMATION AND NON-PUBLIC INFORMATION**

**A.**

STRETTO shares Personal Information for the following reasons:	Can you limit this sharing?
For our everyday business purposes, such as to process your transactions; maintain your account(s); conduct our core businesses; develop, enhance, position, and market our core products and services; respond to court orders, subpoenas, and legal investigations; or to report consumer disputes to the credit bureaus.	No, you cannot limit this sharing.
For our marketing purposes, to offer our Products and Services to you.	Yes, you can limit this sharing.
For Joint Marketing with other financial companies.	Yes, you can limit this sharing.
For our Affiliates' everyday business purposes, information about your transactions and experiences.	No, you cannot limit this sharing.
For our Affiliates to market to you.	Yes, you can limit this sharing.
For Nonaffiliated Entities to market to you. STRETTO will make Personal Information or Non-Public Information available to Nonaffiliates for the purpose of marketing to you only under the following limited circumstances: the Personal Information or Non-Public Information has been Deidentified or Aggregated with data from multiple Clients, Consumers, Customers and/or Visitors so that it no longer identifies you; the Personal Information or Non-Public Information is already publicly available or in the public domain; you have knowingly and voluntarily authorized STRETTO to disclose the Personal Information or Non-Public Information to third parties; and/or the Personal Information or Non-Public	Yes, you can limit this sharing.

<p>Information is provided to a third-party mail house contracted by STRETTO to conduct a marketing mailing, and said mail house is contractually prohibited from using the data for any other purpose.</p>	
<p><b>For Nonaffiliated Entities for their general commercial purposes.</b> STRETTO will sell your Personal Information or Non-Public Information to Nonaffiliates for their general commercial purposes only under the following limited circumstances: the Personal Information or Non-Public Information has been Deidentified or Aggregated with data from other Clients, Consumers, Customers and Visitors so that it no longer identifies you; the Personal Information or Non-Public Information is already publicly available, meaning that it has been lawfully made available by federal, state, or local government records; and/or you have knowingly and voluntarily authorized STRETTO to disclose the Personal Information or Non-Public Information to third parties.</p>	<p>Yes, you can limit this sharing</p>

**B.** Please note, STRETTO does not share information about your creditworthiness with any entity, Affiliate or Nonaffiliate.

**C.** In the event that STRETTO should be requested or required (as by subpoena, civil investigative demand or similar process) to disclose any Personal Information or Non-Public Information that is input into, accessed through or maintained or stored in a database related to the Sites or Software to any third party, STRETTO will use reasonable efforts to notify Consumers, Customers, Clients and Visitors, as applicable, so that these individuals may seek a protective order or take other appropriate action. Notwithstanding, STRETTO shall have no liability to Consumers, Customers, Clients and Visitors, or any third parties for disclosing such Personal Information or Non-Public Information as contemplated by the previous sentence even if the individuals involved were not afforded sufficient time to seek a protective order or to take other appropriate action.

**D. Former Customers.** When you are no longer our Customer, we continue to share your Personal Information or Non-Public Information as described in this notice. However, you can contact us at any time to limit our sharing.

**7. HOW TO LIMIT OUR SHARING**

**A. Consumers, Customers and Clients.** If you would like to limit our sharing of your Personal Information, you should visit us online at <https://account.myhorizontoday.com> and navigate to “My Accounts”. In the alternative, you may contact us by calling **1.866.218.1003**, emailing [Legal@stretto.com](mailto:Legal@stretto.com), or writing to STRETTO, ATTN: Opt-Out, 4540 Honeywell Court, Dayton, OH 45424.

**B. Visitors.** If you are a Visitor to the STRETTO Sites, you may opt out of having your Personal Information collected by STRETTO, used by STRETTO for secondary purposes, disclosed to third parties, or used to send promotional correspondence, by

contacting STRETTO. You may contact us by calling **1.866.218.1003**, emailing [Legal@stretto.com](mailto:Legal@stretto.com), or writing to STRETTO, ATTN: Opt-Out, 4540 Honeywell Court, Dayton, OH 45424.

## 8. HOW WE SAFEGUARD PERSONAL INFORMATION

A. At STRETTO, we use our best efforts to ensure that no unauthorized parties have access to any Consumer's, Customer's or Client's Personal Information. Whenever a consumer credit product or due diligence product is ordered for a Client, we utilize up-to-date Internet technology to authenticate the Client's identity and to obtain the Client's legitimate authorization and written instructions for the transaction. We provide training to our employees and agents to help ensure that Personal Information will be handled responsibly and in accordance with this Privacy Policy.

B. To protect your Personal Information from unauthorized access and use, we use reasonable physical, electronic, and procedural safeguards to protect the privacy of data stored within our network, including the following: 128-bit SSL Encryption; Secure User Names & Passwords to authenticate users accessing the system; a commercially reasonable firewall; and tracking of Consumer and Customer IP addresses to detect and diagnose problems and potential system abuse. In addition, STRETTO does not use IP addresses to identify Consumers or Customers; link IP addresses to Consumer or Customer account or access information; or authorize the scanning of its network systems or attempted penetration testing of any degree without the written consent of management.

C. Neither STRETTO nor our affiliates will ever send Consumers, Customers or Clients a request via e-mail for Personal Information (e.g., social security number, account number, date of birth, etc.). If you receive an e-mail appearing to come from STRETTO or one of its affiliates asking for Personal Information, please contact the appropriate department below so that we can take the proper action to protect you.

### **For communications regarding Trustee Suite™ by Stretto and Stretto's document portal**

Mail: STRETTO, 410 Exchange, Ste. 100, Irvine, CA 92602

Phone: 1.800.634.7734

Email: [web-webmaster@stretto.com](mailto:web-webmaster@stretto.com)

### **For communications regarding Best Case® by Stretto, CIN Legal Data Services, CINcompass® and/or the Best Case® by Stretto client portal**

Mail: STRETTO, 4540 Honeywell Court, Dayton, OH 45424

Phone: 1.866.218.1003

Email: [CINCLR@stretto.com](mailto:CINCLR@stretto.com)

## 9. CONTACTS FOR CHANGES AND ADDITIONAL INFORMATION

A. If you have questions or concerns regarding this Notice or the protection of your Personal Information and privacy rights, or you would like to update or correct information you have provided us, you can do so by emailing us at [Legal@stretto.com](mailto:Legal@stretto.com) or calling us at **1.866.218.1003**.

B. For additional information about privacy or consumer reporting, visit the following Web sites:

Consumer Financial Protection Bureau: [www.cfpb.org](http://www.cfpb.org)

TransUnion: [www.transunion.com/corporate/personal/personal.page](http://www.transunion.com/corporate/personal/personal.page)

Consumer Data Industry Association: [www.cdiaonline.org](http://www.cdiaonline.org)

Experian: [www.experian.com/consumer/credit\\_education.html](http://www.experian.com/consumer/credit_education.html)

Federal Trade Commission: [www.ftc.gov](http://www.ftc.gov)

Equifax: [www.econsumer.equifax.com](http://www.econsumer.equifax.com)

## 10. CALIFORNIA PRIVACY RIGHTS.

This section has been incorporated into STRETTO's Privacy Policy to comply with the California Consumer Privacy Act of 2018 ("CCPA"). Any capitalized terms defined in the CCPA have the same meaning when used within this Section 10.

A. Under the California Consumer Privacy Act (CCPA), if you are a California resident, you have the following rights.

### (i) Right to Access/Disclosure Right

You have the right to request a disclosure of the Personal Information collected, sold, and shared about you over the past 12 months and the purpose for doing so. Upon submission of a verifiable consumer request, we will provide you with the following information:

- The categories of Personal Information we collected about you;
- The categories of sources for the Personal Information we collected about you;
- Our business or commercial purpose for collecting or selling that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about you;
- A list that includes the Personal Information that we disclosed for a business purpose, identifying the category of Personal Information that each category of recipient obtained; and
- A separate list that includes the Personal Information we sold, identifying the Personal Information categories that each category of recipient purchased.

*Please be aware that the disclosure results will not include credit report information, certain health information, financial information or driving records.*

If we provide this information to you electronically, the information will be in a portable format. To the extent that it is technically feasible, we will provide you the information in a readily useable format that you can easily transfer to another entity.

### (ii) Right to Deletion

If we collected Personal Information from you, you have the right to request the deletion of this Personal Information.

Please be aware that data STRETTO has collected under the Fair Credit Reporting Act (FCRA) for the purposes of credit reporting will not be deleted. Other exemptions from requests for deletion include information governed by the Gramm-Leach-Bliley Act (GLBA), Driver's Privacy Protection Act (DPPA) and Health Insurance Portability and Accountability Act (HIPPA).

**(iii) Right to Be Free from Discrimination**

California residents have the right to be free from discrimination for exercising any of the California consumer privacy rights. If you choose to exercise any of your CCPA rights, we will not:

- Deny you goods or services;
- Charge you a different price or rate for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of good or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**(iv) Right to Opt-Out of the Sale of Personal Information**

California residents have the right, at any time, to direct a business not to sell their personal information. *STRETTO does not sell the Personal Information of California residents to any third parties.*

**(v) Right to Opt-In the Sale of Personal Information for Children**

A California resident minor (between ages 13 and 16) or child's parent or guardian (if the child is under the age of 13) must opt-in to allow us to sell your personal information.

**(vi) Right to Know**

You have the right to know the categories of personal information we collect and the purpose for the collection. You have the right to know the categories of personal information that we collected, sold, and disclosed for a business purpose during the prior 12 months.

**B.** For more information about the CCPA, please access the full text of the law at [California Consumer Privacy Act of 2018](#).

**C. Making a CCPA Request.** To make a request under the CCPA, please use one of the following contact methods. In order to verify your identity and process your request, we will require you to provide us with your first name, last name, social security number, and current address.

**(i) Request by U. S. Mail, Email or Fax:** Please fill out the [CCPA Request Form](#) completely. Sign and date the form. Mail the form and a legible copy of a state-issued photo ID showing your current name and address BY FAX to 1.866.307.1003 OR BY EMAIL to [Legal@stretto.com](mailto:Legal@stretto.com) OR BY MAIL to STRETTO, ATTN: CCPA Request, 4540 Honeywell Court, Dayton, OH, 45424.

(ii) Request by Telephone: Please call 1.866.218.1003 between the hours of 8:00 a.m. and 8:00 p.m. ET, Monday – Friday.

(iii) Online Request: *This option is under development. Please select another option.*

**D. Authorized Agent.** If you would like to designate an authorized agent to make a CCPA request on your behalf, please submit your request by U.S. Mail as described in Section 10. C. (i) and include a signed authorization permitting a named agent to request information on your behalf.

**E. Personal Information We Collect from California Residents.**

(i) In the past 12 months, we have collected the following categories of Personal Information about California residents:

- Personal and online identifiers, such as first and last name, email address, or unique online identifiers;
- Commercial or transactions information, such as records of property or products or services purchased, obtained or considered;
- Internet or other electronic network activity information, such as browsing history, search history, interactions with a website, email, application, or advertisement;
- Biometric information, such as call recordings;
- Geolocation information;
- Professional or employment-related information;
- Inferences drawn from the above information about your predicted characteristics and preferences; and
- Other information about you that is linked to the Personal Information above.

(ii) In the past 12 months, we have not collected the following categories of Personal Information about California Residents:

- Categories of information described in Section 1798.80(e) of the California Civil Code, such as physical characteristics or description, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, medical information<sup>1</sup>, or health insurance information;
- Characteristics of protected classifications under California or federal law, such as race or gender;
- Sensory information, such as audio, electronic, visual, thermal, olfactory, or similar information; or
- Education information.<sup>2</sup>

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<sup>1</sup> Except to the extent that such information may constitute Case Data that has been entered into Stretto Software by a Customer.

<sup>2</sup> Except to the extent that such information was provided to Stretto in connection with an application for employment with Stretto.

**F. Categories of Sources Used to Collect California Information.** We collect Personal Information from California residents using the following categories of Sources:

- California residents themselves when they visit our websites and/or use our products or services;
- Consumer Reporting Agencies, such as Experian, TransUnion and Equifax;
- Online and Mobile Websites & Applications, through Cookies and web site analytics Service Providers such as Google Analytics;
- Other Authorized Data Compilers;
- Public Records, such as judgments and foreclosures;
- Publishing Product Companies, such as LexisNexis;
- Government Entities, such as the Internal Revenue Service;
- Attorneys Representing California Residents in bankruptcy cases; and
- Trustees assigned to the bankruptcy cases filed by California Residents.

**G. Why We Collect, Use, and Share California Information.** We collect, use, and disclose the personal information described in *Section 10. E. (i.)* for one or more of the following commercial and business purposes:

(i) **Commercial Purposes.** Our Commercial Purposes as identified in the CCPA include marketing, developing insights as to consumer interests and behaviors, keeping contact information up to date and relevant and enabling relevant and personalized marketing messages.

(ii) **Business Purposes.** Our Business Purposes as identified in the CCPA include:

- Internal research
- Auditing
- Quality control
- Improving our services
- Legal compliance
- Order fulfillment
- Identity Verification
- Maintaining and servicing accounts
- Providing customer service
- Detecting security incidents and protecting against fraudulent or illegal activity

**H. Recipients of California Personal Information.**

(i) For the commercial and business purposes listed in *Section 10. G.*, we may disclose the categories of Personal Information described in *Section 10. E. (i)* to the categories of third parties listed below:

- Service Providers
- Public or Government Entities
- Advertising Networks
- Internet Service Providers
- Data Analytics Providers
- Operating Systems and Platforms
- Consumer Reporting Agencies



(ii) We do not sell the categories of Personal Information described in *Section 10. E. (i.)* to any third parties for any purposes.

**I. Contact Information.** For questions or concerns about Stretto's California Privacy Rights policy or practices, please call us toll free at **1.866.218.1003** between the hours of 8:00 a.m. and 8:00 p.m. ET, Monday – Friday; or contact us by mail at: STRETTO, ATTN: Compliance Department, 4540 Honeywell Court, Dayton, OH 45424.