

## CONSUMER PRIVACY AND OPT OUT NOTICE v.2025.1

Stretto, Inc. (“STRETTO”) is providing you with this combined Initial Consumer Privacy Notice and Opt Out Notice because you, your bankruptcy attorney or the trustee for your bankruptcy case is a Customer of STRETTO. These notices are required by 12 CFR Part 1016 (Regulation P) and the Financial Privacy Rule of the Gramm-Leach-Bliley Act (15 U.S.C. § 6802 et seq); and 12 CFR Part 1022 (Regulation V) and the Affiliate Marketing Rule of the Fair Credit Reporting Act (15 U.S.C. § 1681a(d)(2)).

**I. Definitions.** Any capitalized terms used herein that are not defined below will have the meaning ascribed to them in the Stretto Privacy Policy available online at [www.stretto.com/legal-policies/](http://www.stretto.com/legal-policies/).

**“Affiliated Companies”** and **“Affiliates”** mean companies related by common ownership or control. They can be financial and nonfinancial companies. Stretto, Inc.’s affiliates include nonfinancial companies such as Best Case LLC and Second Bankruptcy Course, LLC; and financial companies such as Credit Infonet, Inc., a consumer reporting agency, and Default Mitigation Management, LLC.

**“Aggregated”** describes information relating to a group or category of consumers from which the identities of individual persons have been removed. Aggregated data is not linked to or reasonably linkable to any particular consumer or household, including via a device, and is not Consumer Information.

**“Consumer”** means a natural person who is 18 years of age or older, who resides in the United States of America or its territories and who is not a citizen of any country that is a member of the European Economic Area, the United Kingdom, or Switzerland.

**“Consumer Information”** means 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. Consumer Information excludes publicly available information, Deidentified information, Aggregated information, information subject to the Gramm-Leach-Bliley Act and HIPAA, and information that is otherwise exempted or excluded by state data privacy laws.

**“Customer”** means a Consumer who has a continuing contractual 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”** describes information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to any particular consumer or household, 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.. Deidentified information is not Consumer Information.

**“Joint Marketing”** means the marketing of financial products or services to Customers or Consumers by two nonaffiliated financial companies that have executed a formal agreement regarding said marketing. STRETTO has joint marketing agreements with companies that offer consumer services such as nontraditional credit reporting.

**“Nonaffiliated Companies”** and **“Nonaffiliates”** mean companies not related by common ownership or control. STRETTO’S Nonaffiliated Companies 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 data from STRETTO for their own market research and marketing purposes.

**“Sites”** and **“Stretto Sites”** mean STRETTO’s websites, including [www.\\*.stretto.com](http://www.*.stretto.com), [www.app\\*.bestcase.com](http://www.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), [www.cp.stretto.com](http://www.cp.stretto.com), [www.studentloanify.com](http://www.studentloanify.com) and [www.dclmwp.com](http://www.dclmwp.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™.

**“Services”** mean STRETTO products and services such as real property appraisals and consumer credit reports that are sold by Credit Infonet, Inc. Services assist Customers with preparing or reviewing consumer bankruptcy cases and assist Consumers with meeting their obligations under the Bankruptcy Code.

**II. STRETTO collects your Consumer Information.** When you visit one of our Sites or use one of our Services, or when your bankruptcy attorney either orders our Services or uses our Software to prepare or administer your bankruptcy case, STRETTO collects your Consumer Information and uses it as described in our Privacy Policy (available online at [www.stretto.com/legal-policies/](http://www.stretto.com/legal-policies/)). Consumer Information we collect includes, but is not limited to, some or all of the following data types:

- A.** Your full name, address, telephone number, email address, type of bankruptcy case being prepared, and jurisdiction for filing; and
- B.** The identity of your creditors, the amounts you owe to creditors, your income, your personal property, any exemptions you are planning to claim, your intentions as to reaffirmation of debts, your real property owned and any appraisals of the property’s value.

**III. STRETTO protects your Consumer Information.** STRETTO uses security measures that comply with federal laws and regulations and industry best practices to protect Consumer Information from unauthorized access and use. These measures include network security, computer safeguards, file encryption and secured-entry worksites as well as procedural safeguards and employee training on maintaining information security. However, due to the prevalence of security threats such as malicious hackers and zero-day attacks, we cannot guarantee that your information will never be unlawfully intercepted or accessed.

<b>IV. STRETTO uses and shares Consumer Information collected from Sites, Software, and orders for Services for the following purposes:</b>	<b>Can you limit this sharing?</b>
<p><b>A. For STRETTO’s and Affiliated Companies’ everyday business purposes</b>, such as to process your or your bankruptcy attorney’s orders for our products or services; to maintain your account; to conduct our core businesses; to develop, enhance and position our core products and services; to respond to court orders, subpoenas, and legal investigations; to conduct statistical analyses of Consumers’ behavior; to customize Site and product content; to Aggregate or Deidentify Consumer Information and use it along with Publicly Available Data to develop, train, and improve AI Tools like Conductor and to gain business insights with the help of AI and automated systems; and/or to report consumer disputes to the credit bureaus.</p>	<p>No, you cannot limit this sharing and use.</p>
<p><b>B. For STRETTO’s and Affiliated Companies’ marketing purposes</b>, which include but are not limited to contacting you via calls, emails and/or mailings to offer you our products and services; to let you know about updates to the Sites and/or new products and services; and to inform you about upcoming events.</p>	<p>Yes, you can limit this sharing and use.</p>
<p><b>C. For Joint Marketing</b> by STRETTO and other financial companies.</p>	<p>Yes, you can limit this sharing and use.</p>
<p><b>D. For Nonaffiliated Companies to market to you.</b></p>	<p>Yes, you can limit this sharing and use.</p>
<p><b>E. For Nonaffiliated Companies to use for their general business purposes.</b></p>	<p>Yes, you can limit this sharing and use.</p>
<p><b>F. For Nonaffiliated Companies to use as Aggregated Information or Deidentified Information for their general business purposes.</b></p>	<p>No, you cannot limit this sharing and use.</p>
<p><b>G. Additional Sharing and Use.</b> STRETTO may disclose Consumer Information as is necessary to comply with a subpoena or court order; to cooperate with law enforcement or other government agencies; to establish or exercise our legal rights; to defend against legal claims; to help with internal and external investigations; or as otherwise required by law or permitted by law. In addition, STRETTO may disclose Consumer Information in connection with the sale or merger of STRETTO or any transaction that involves the sale or assignment of some or all our assets; or if you or STRETTO become the subject of a petition in bankruptcy or any proceeding relating to insolvency, receivership, liquidation or assignment for the benefit of creditors.</p>	<p>No, you cannot limit this sharing and use.</p>

**V. Your Options.** If you consent to STRETTO's use and sharing of your Consumer Information as described above, you do not need to take any action. However, if you would like to limit some of STRETTO's use and sharing of your Consumer Information, please contact us using one of the following methods:

**A. Telephone:** Please call 1.866.218.1003 between the hours of 8:00 a.m. and 8:00 p.m. ET, Monday – Friday.

**B. Email:** Please email your request along with your name and address to [legal@stretto.com](mailto:legal@stretto.com) or scan and email the **Opt-Out Form\*** to [legal@stretto.com](mailto:legal@stretto.com).

**C. Postal mail:** Please mail the **Opt-Out Form\*** to Stretto, ATTN: Privacy Opt-Out, 410 Exchange Ste. 100, Irvine, CA 92602.

**VI. State Privacy Rights:** If you are a resident of various U.S. states that have passed consumer privacy laws, including but not limited to California, Colorado, Connecticut, Delaware, Indiana, Iowa, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah, and Virginia, you may have enhanced access to and control over the Consumer Information we have collected. Please see **Section 12** of the **Privacy Policy** and other state-specific notices posted at <https://www.stretto.com/legal-policies/> for more information.

*\* Available on the following page.*

### STRETTO OPT-OUT FORM

<b>Your information.</b> Please print the following information:	
Full Name:	
Current Address: (No P.O. Boxes)	
Telephone Number:	
Email Address:	
<b>Opt-Out Designations</b> ( <i>Please check all that apply</i> ):	
<input type="checkbox"/> <b>Do not</b> use my information for STRETTO’s marketing purposes.	
<input type="checkbox"/> <b>Do not</b> use my information for STRETTO’s Affiliated Companies’ marketing purposes.	
<input type="checkbox"/> <b>Do not</b> use my information for Joint Marketing by STRETTO and other nonaffiliated financial services companies.	
<input type="checkbox"/> <b>Do not</b> share my information with Nonaffiliated Companies for their marketing purposes.	
<input type="checkbox"/> <b>Do not</b> share my information with Nonaffiliated Companies for their general business purposes.	
<b>Your signature:</b>	
<b>Date:</b>	

Please scan and email this completed form to Stretto at [legal@stretto.com](mailto:legal@stretto.com), or mail it to STRETTO at this address: Stretto, Inc., ATTN: Privacy Opt-Out, 410 Exchange Ste. 100, Irvine, CA 92602.