

PRIVACY POLICY FOR STRETTO COMPANIES

NOTICE: Both Credit Infonet, Inc. d/b/a CIN Legal Data Services, formerly known as “CINgroup”, and its subsidiary Best Case, LLC are now part of Bankruptcy Management Solutions, Inc., d/b/a Stretto.

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 9, DEFINITIONS.

1. WHO WE ARE

Bankruptcy Management Solutions, Inc. d/b/a Stretto; 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 to the consumer law industry. 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, www.cingroup.com, www.cinlegal.com, www.cincompass.com, www.bestcase.com, www.mycaseinfo.com, and www.myhorizontoday.com (“Stretto Sites” and “Sites”).

(a) Consumer Reporting Agency. STRETTO company 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®.

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.

(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 time frames 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 for Credit Infonet. Keeping your information secure is very important to us. We employ electronic, physical and procedural safeguards and best practices to protect your information. However, due to the nature of the Internet, we cannot fully 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. TYPES OF PERSONAL INFORMATION WE COLLECT

(a) Visitors. When you visit one of our Sites, STRETTO may collect and/or track (i) your home server domain name, e-mail address, type of client computer, and the type of Web browser you are using; (ii) the e-mail addresses of Visitors who communicate with STRETTO via e-mail; (iii) information you knowingly provide to STRETTO by filling out online forms, registration forms, surveys, and contest entries on the Sites (including demographic and personal profile data such as name, postal address, and phone number); and (iv) aggregate and user-specific information on which pages of the Sites you accessed.

(b) Consumers and Customers. When a Consumer or Customer orders, retrieves, or uses STRETTO products or services; provides us with account information; shows a driver's license or gives us contact information; or uses a credit or debit card to make a purchase from us; we may collect the following types of Nonpublic Personal Information ("NPI"):

- (i) Information we receive from Consumers and Customers on applications, forms, electronic templates, and in other communications to us, whether in writing, in person, by telephone, by Internet connection, or any other means;
- (ii) Information we obtain from Consumers' and Customers' activities on our Sites through the use of electronic technologies such as cookies;
- (iii) Information Consumers and Customers give to us when they make purchases;
- (iv) Information about Consumers' and Customers' transactions with us, our affiliated companies, or others;
- (v) Information we receive from a consumer reporting agency and other data and information providers.
- (vi) Data provided by Consumers and Customers such as their names, addresses, telephone numbers, SSNs, and dates of birth;
- (vii) Data provided by our Affiliates or third parties such as credit bureaus or other companies;
- (viii) Consumers' and Customers' account data such as account numbers, balances, and payment history;
- (ix) Consumers' and Customers' credit data including credit history as provided by CRAs;
- (x) Verifying data necessary to authenticate Consumers' and Customers' identities;
- (xi) Data on purchases made through STRETTO and its affiliates; and
- (xii) Anonymous and aggregated data about Consumers' and Customers' use of the Sites and products, including but not limited to Site navigation and types of Site functionality used.

3. HOW WE COLLECT PERSONAL INFORMATION

STRETTO collects information Visitors, Consumers and Customers provide to us when filling out online forms, registration forms, surveys, and contest entries or when placing orders for our products and services. In addition, STRETTO uses the following to collect personal information via our Sites:

(a) Web Site Analytics. Our Web servers automatically collect the domain names, not the e-mail addresses, of visitors to the Sites. STRETTO uses this information 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.

(b) Cookies. 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 at <https://www.cingroup.com/legal/>.

(c) Third-Party Service Providers. We also collect data from visitors to our Sites using third party service providers. The following table identifies the third-party service providers that STRETTO uses (hereinafter, "TSP"), 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
<p>Google Analytics including Google Data Studio and Google Tag Manager</p>	<p>Google Analytics uses cookies to collect information such as how often users visit this Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google Analytics collects only the IP address assigned to a visitor on the date that visitor visits the Site. Google Analytics then assigns a user ID code to that visitor. Google does not obtain visitors' names or other identifying information.</p> <p>We use Google Analytics measurement service on our web sites to understand how visitors engage with our sites. We use anonymized information obtained from Google Analytics to improve our Sites.</p>	<p>Google Analytics uses collected information to analyze visitors' use of the Site, to generate reports about Site activities for website operators and to provide further services related to use of the Site and the Internet.</p> <p>Google's Privacy Policy: https://policies.google.com/privacy#intro.</p> <p>How Google Analytics Collects and Processes Data: https://www.google.com/policies/privacy/partners/</p> <p>How Google Analytics Shares Collected Information: https://policies.google.com/privacy#infosharing</p> <p>How Google Analytics Safeguards Data: https://support.google.com/analytics/answer/6004245</p> <p>For more information on Google Tag Manager's terms of service and privacy policy, please visit www.google.com/analytics/tag-manager/use-policy/</p>	<p>If you don't want Google Analytics to be used in your browser, you can install the Google Analytics Opt-out Browser Add-on by going to https://tools.google.com/dlpage/gaoptout.</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 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 our website (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>For more information about Google reCAPTCHA and Google's privacy policy, please visit the following links: https://www.google.com/intl/en/policies/privacy/ and https://www.google.com/recaptcha/intro/android.html</p>	<p>N/A</p>
<p>Facebook Tracking Pixel</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 https://www.facebook.com/about/privacy/.</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: https://www.facebook.com/settings?tab=ads.</p>
<p>Twitter Tracking Pixel</p>	<p>Twitter Tracking Pixel uses data tags and cookies to collect users' IP addresses, track users' web browsing, associate users with certain browsers or devices, and associate users' Twitter accounts with information about users' browsers or devices. Twitter does not associate web browsing history with a user'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</p>	<p>Twitter's Privacy Policy: https://twitter.com/privacy?lang=en</p> <p>How Twitter uses cookies and similar technologies: https://help.twitter.com/en/rules-and-policies/twitter-cookies#</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: https://twitter.com/personalization</p> <p>If you are online and want to opt out of seeing interest-based advertising from Twitter in your current browser, visit optout.aboutads.info and www.networkadvertising.org/choices.</p>

	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.		
AppDynamics <i>including</i> APM, Database Visibility, <i>and</i> Browser Real User Monitoring Software	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. We use AppDynamics' software products to monitor and analyze the performance of our business applications and the databases and infrastructure that support them.	AppDynamics Privacy Policy: https://www.appdynamics.com/privacy-policy/	To opt out of interest-based advertising, send an email to privacy@appdynamics.com .

4. HOW WE SAFEGUARD NPI

(a) We use our best efforts to ensure that no unauthorized parties have access to any Consumer's or Customer's NPI. Whenever a consumer credit product or due diligence product is ordered for a Consumer or Customer, we utilize the latest Internet technology to authenticate the Consumer's or Customer's identity and to obtain the Consumer's or Customer's legitimate authorization and written instructions for the transaction. We train and oversee our employees and agents to help ensure that NPI will be handled responsibly and in accordance with this Privacy Policy and STRETTO's guidelines.

(b) To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We use 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 TrueSecure Certified 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 any Consumers or Customers a request via e-mail for any personally identifiable 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 personally identifiable information, please contact our Customer Support Department at 1-866-218-1003 or contact@cingroup.com so that we can take the proper action to protect you.

5. HOW WE USE YOUR PERSONAL INFORMATION

STRETTO uses your collected personal data for editorial and feedback purposes, for marketing and promotional purposes, for statistical analyses of visitors' behavior, for product development, for content improvement, and/or to customize the content and layout of the Sites. In addition, STRETTO may use your collected personal data to contact you via calls and mailings regarding updates to the Sites, new products and services, and upcoming events.

6. HOW WE SHARE YOUR PERSONAL INFORMATION

(a)

STRETTO shares your 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 only make personal data it has collected from you available to Nonaffiliates under the following limited circumstances: the personal data has been fully anonymized and aggregated with data from multiple visitors; the personal data is already publicly available or in the public domain; you have knowingly and voluntarily authorized STRETTO to disclose the personal data to third parties; and/or the personal data 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.	Yes, you can limit this sharing.

(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 of the content that is input into, accessed through or maintained or stored in a database related to the Sites to any third party, STRETTO will use reasonable efforts to notify Consumers, Customers 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, Visitors, or any third parties for disclosing such content 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 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 and Customers. 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 866-218-1003, emailing consumer@cingroup.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 866-218-1003, emailing contact@cingroup.com, or writing to STRETTO, ATTN: Opt-Out, 4540 Honeywell Court, Dayton, OH 45424.

8. CONTACTS FOR CHANGES AND ADDITIONAL INFORMATION

(a) To update or correct information you have provided us, you can do so by emailing us at contact@cingroup.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

TransUnion: www.transunion.com/corporate/personal/personal.page

Consumer Data Industry Association: www.cdiaonline.org

Experian: www.experian.com/consumer/credit_education.html

Federal Trade Commission: www.ftc.gov

Equifax: www.econsumer.equifax.com

9. 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 Bankruptcy, LLC and Second Bankruptcy Course, LLC; and financial companies such as Bankruptcy Management Solutions, Inc. d/b/a Stretto.

“STRETTO Sites” and “Sites” mean STRETTO’s websites, including www.stretto.com, www.cingroup.com, www.cinlegal.com, www.cincompass.com, www.bestcase.com, www.mycaseinfo.com, and www.myhorizontoday.com.

“Consumer” means an individual who is accessing STRETTO products and/or services solely for the Consumer’s own personal, family or household purposes.

“Customer” means a Consumer who has a continuing relationship with STRETTO by virtue of activating an account at a STRETTO Site and/or ordering or using a product or service through the STRETTO Sites.

“Former Customer” means a Customer who no longer has an active account at a STRETTO Site. We share the NPI 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, and third-party service providers such as Google Analytics.

“STRETTO” and “Stretto Companies” means Bankruptcy Management Solutions, Inc. d/b/a Stretto; 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.