

## California Consumer Privacy Notice

(To obtain a copy of this notice in an alternative format please phone Scott & Associates (“we”, “our”, and “us”) at (866)-298-3155 or email us at [info@scott-pc.com](mailto:info@scott-pc.com)). You can also download PDF files of this notice [here](#).)

This California Consumer Privacy Notice (“Notice”) supplements our Scott & Associates Privacy Policy. This Notice applies solely to California consumers, including personnel working on behalf of our business partners (e.g., vendors), subject to the exceptions listed below. This Notice applies to personal information we collect about California consumers, both on our website and offline.

This Notice does not apply to:

- Scott & Associates personnel or job applicants (see **Privacy Policy For Employees And Applicants** section below);
- Information we collect, process or disclose in connection with the provision of financial services per the U.S. Gramm-Leach-Bliley Act and its implementing regulations (“GLBA”). If you have a financial service with us, we will use and share the personal information that we collect from or about you in accordance with our Privacy Policy.

This Notice uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act of 2020 (the “CPRA”), and its implementing regulations (the “CCPA/CPRA”).

### Notice of Collection and Source of Personal Information

We only knowingly collect information covered by GLBA, and therefore, exempt from the CCPA.

During the 12-month period before the effective date of this Notice, we typically collect the following categories of information from you (and others as noted):

- Personal identifying information, including, but not limited to name, address, telephone number, social security number, account number, email address, driver’s license number, as well as other identifying information, which we obtain from a person’s creditor, and/or credit reports and/or third-party data providers and/or the consumer;
- Characteristics such as age, gender, etc., which we obtain from credit reports and/or a person’s creditor and/or the consumer;
- Retail information, which we obtain from credit reports and/or a person’s creditor;
- Internet activity such as IP address from cookies, after visiting our websites or payment portal;
- Banking information, which we obtain from a person’s creditor and/or credit reports and/or third-party data providers and/or the consumer;

- Geolocation data and location data, including GPS coordinates, which we obtain from process servers if there is a lawsuit filed;
- Call recordings, which are made when the consumer has a telephone conversation with us;
- Professional and employment-related information, which we obtain from the consumer's creditor, credit reports, third-party data providers, consumer's employer, and/or the consumer;
- Educational information, which we obtain from the consumer's creditor, credit reports, and/or possibly any applications or other documents gathered from a person's creditor; and
- Biometric information including, but not limited to physical descriptions, photos and voiceprints (audio recordings), which we obtained from person's creditor and/or process servers if there is a lawsuit, and recordings which are made when the consumer has a telephone conversation with us.

### **Use of Personal Information**

We may use (and may have used during the 12-month period prior to the effective date of this Notice) your personal information for the purposes described in our Privacy Policy and for the following Business Purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, processing or fulfilling information or services requested by you, verifying customer information, processing payments, providing analytics services, providing storage, or providing similar services;
- Auditing compliance;
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration; and
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

Other business or business operational purposes as follows:

- Debt collection.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for collections.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and our clients, including for collections.
- To improve our website and present its contents to you.

- For testing, research, analysis and service development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, governmental regulations, or comply with a court order or subpoena to provide information.
- To comply with any attorney ethical obligations
- As described to you when collecting your Personal Information

We do not collect or process sensitive personal information with the purpose of inferring characteristics about California consumers covered by this Notice.

**Retention of Personal Information**

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in our Privacy Policy and this Notice, and/or otherwise required by law or attorney ethical obligations to be retained.

**Sale or Sharing of Personal Information**

We do not and will not sell your personal information or share your personal information for cross-context behavioral advertising purposes.

**Disclosure of Personal Information**

During the 12-month period prior to the effective date of this Notice, we may have disclosed the following categories of personal information about you for a Business Purpose to the following categories of third parties:

Category of Personal Information	Category of Third Party
Identifiers per Cal. Civ. Code § 1798.140 (v)(1)(A)	<ul style="list-style-type: none"> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as independent auditors</li> <li>• Data analytics providers</li> </ul>
Characteristics of protected classifications under California or federal law per Cal. Civ. Code § 1798.140 (v)(1)(C)	<ul style="list-style-type: none"> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as independent auditors</li> </ul>

	<ul style="list-style-type: none"> <li>• Data analytics providers</li> </ul>
Online Activity per Cal. Civ. Code § 1798.140 (v)(1)(F)	<ul style="list-style-type: none"> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as independent auditors</li> <li>• Data analytics providers</li> </ul>
Sensory Information per Cal. Civ. Code § 1798.140 (v)(1)(H)	<ul style="list-style-type: none"> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as independent auditors</li> <li>• Data analytics providers</li> </ul>

We also disclose personal information for Business Purposes to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Trusted service providers and contractors are used to perform functions and provide services for us for a Business Purpose. We may disclose your personal information with them, but only to the extent necessary to perform these functions and provide such services, such as perfecting service of process, processing payments, and data analytics.

We do not use or disclose Sensitive Personal Information for purposes other than those as specified Cal. Civ. Code § 1798.121(a).

**California Consumer Privacy Rights**

A consumer has the right to request that we disclose the following upon receipt of a verified request:

Right to Know: You have the right to request, twice in a 12-month period, that we disclose to you:

- The categories of personal information we collect;
- The categories of sources from which the personal information is collected;
- The purpose for collecting the personal information;

- The categories of third parties with whom the business shares personal information; and
- The specific pieces of personal information we have collected, disclosed, or sold.

during the past 12 months.

**Right to Correction:** You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.

**Right to Deletion:** You have the right to request that we delete certain personal information we have collected from you, subject to various exceptions. The information that Scott & Associates collects generally falls within an exception and does not have to be deleted upon request. Nonetheless, such a request can be made to Scott & Associates at (866)-298-3155 or [fill out this form](#) and email us at [info@scott-pc.com](mailto:info@scott-pc.com)).

**Right to Opt-Out of Sale or Sharing:** You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes. As described above, we do not sell personal information or share personal information for cross-context behavioral advertising purposes.

**How to Submit a Request.** If you wish to request the categories of information or the actual information we have collected about you, please call us at (866)-298-3155 or [fill out this form](#) and email us at [info@scott-pc.com](mailto:info@scott-pc.com)). Scott & Associates is a debt collector and all information that is collected will be used for debt collection purposes.

**Verification.** To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. Once we receive your request, we will compare the information you provided with the information Scott & Associates already has. If we can verify that the request came from you, we will provide the required information. We will match 2-3 identifying, personal information data points to verify that the request came from the consumer. If we cannot verify that the request came from the consumer, we will notify the consumer.

**Right to Non-Discrimination.** You have a right not to receive discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA/CPRA.

The California Privacy Act provides that a consumer can designate an authorized agent to make a request under the California Consumer Privacy Act. The consumer must provide either a power of attorney or written authorization to authorize an agent to make a request.

This privacy policy was last updated on April 28, 2023.

**Privacy Policy For Employees And Applicants**

The California Consumer Privacy 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:

1. Identifiers such as personal identifying information, including, but not limited to name, address, telephone number, social security number, email address, work authorization documents, bank account information, as well as other identifying information from you, your creditor, credit reports and/or third-party data providers;
2. 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.
3. Protected classifications under California or federal law such as age, race, color, citizenship, marital status, gender, etc. from you and providers of background checks;
4. Internet or similar activity information such as IP address from your browsing history, search history, information on an interaction with websites and applications;
5. Geolocation data such as device location if you work remotely;
6. Audio, electronic, visual or similar information such as call and video recordings;
7. Biometric information such as photos or other physical patterns;
8. Professional and employment related information from you and/or third-party data providers;
9. Educational information from you and/or third-party data providers;
10. Information such as work history and performance evaluations; and
11. 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 pre-employment screenings
- 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 CCPA:**

- 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 Scott & Associates 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 Scott & Associates.

### **Changes to This CCPA Disclosure**

We may change or update this CCPA Disclosure in the future. When we do, we will post the revised CCPA Disclosure To Employees and Applicants on our website.