

**Crown Asset Management, LLC**  
**California Residence Privacy Notice**

**Privacy Notice – Applicable to California Residents**

This Privacy Notice is for California residents (“you”), and supplements the information contained in the Crown Asset Management Privacy Policy. We adopt this policy to comply with the California Consumer Privacy Act (“CCPA”). Any terms defined in the CCPA have the same meaning used in this notice.

**1. Information We Collect About Consumers**

We may collect and use the following personal information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer, device, or household (“personal information”). We have collected the following categories of personal information from and about consumers within the last 12 months:

<b>Categories of Personal Information</b>	<b>Examples of Specific Types of Personal Information Collected</b>	<b>Collected</b>
A. Identifiers	A real name, alias, postal address, email address, telephone numbers, account number, Social Security number, date of birth, or other similar identifiers.	Yes
B. Personal Information categories listed in California Customer Records Statute (Cal. Civ. Code §1798.80(e))	A name, signature, Social Security number, address, telephone number, driver’s license or state identification card number, insurance policy number, employment, , bank account number, credit card number, or any other financial information, Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or Federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes

E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and	No
	voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other electronic network activity information	Browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	No
G. Geolocation data	Physical location or movements.	No
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information	Current or past job history.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from any of the information identified above	Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Personal Information does not include any of the following, some of which we do collect:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## 2. How Your Personal Information is Collected

We collect most of this personal information directly from our sellers, as well as from you by telephone, written correspondence through the mail or email, by viewing your public

social media/network pages, or other information available online. However, we may also collect information:

- From publicly accessible sources (e.g., property records or court records);
- From our service providers (e.g., letter vendors, skip tracing vendors, collection agencies, payment processing vendors, call analytics vendor, and electronic signature service providers);
- Directly from a third party (e.g., third parties contacted during skip tracing activities pursuant to 16 U.S.C. §1692b, such as your friends, neighbors, relatives, and/or employer);
- From a third party with your consent (e.g., your authorized representative and/or attorney); and
- From activity on our website where you voluntarily provide personal information.

### **3. Why We Use Your Personal Information**

We may use or disclose your personal information for one or more of the following business purposes in our role as a “business” under the CCPA:

- To fulfill or meet the reason you provided the information. For example, if you share your personal information to make a payment, we will use that information to process your payment.
- Performing services on behalf of a business or service provider, including maintaining or servicing accounts, providing customer service, or verifying customer information, or providing similar services on behalf of a business or service provider.
- Auditing related to a current interaction with the consumer, including, but not limited to, auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the current interaction.
- To respond to legal authority requests and as otherwise required by applicable law, court order, or governmental regulations.
- As necessary or appropriate to protect the rights, property or safety of us, our clients, or others.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **4. Who We Share Your Personal Information With We**

routinely share personal information with:

- Our affiliates, including companies within the CAM Holdings, LLC group;

- Collectors and third parties that deliver business support services to us (e.g., letter vendors, skip tracing vendors, collection agencies, payment processing vendors, call analytics vendor, and electronic signature service providers);
- Credit reporting agencies; • Our insurers and brokers; and
- Our bank[s].

In the preceding twelve (12) months, we have not sold any personal information.

## **5. Your Rights**

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and potentially certain other privacy and data protection laws, as applicable, to request or direct us as follows regarding your personal information:

### ***a. Disclosure of Personal Information We Collect About You***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request in accordance with the CCPA, we will disclose to you as required and as applicable:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we share personal information, if any.
- The specific pieces of personal information we have collected about you.

### ***b. Disclosure of Personal Information Used for a Business Purpose***

In connection with any personal information we may sell or may disclose to a third party for a business purpose, you have the right to know:

- If applicable, the categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and
- The categories of personal information that we disclosed about you for a business purpose.

### ***c. Deletion Request Rights***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request in accordance with the CCPA, we will as required and as applicable delete (and direct our service providers to delete) your personal information from our records, unless a statutory or other legal exception applies.

***d. Protection Against Discrimination***

You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA.

**6. How to Exercise Your Rights**

To exercise the rights described herein, please submit a verifiable consumer request to us by either:

- Submit a data subject request in writing to Crown Asset Management, LLC, 3100 Breckinridge Blvd, Suite 725, Duluth, GA 30096;
- Calling us, toll-free, at 1-866-696-4442.

Please note that you may only make a data access disclosure request twice within a 12month period.

**7. Verifying Your Identity (i.e., verifiable consumer request)**

If you choose to contact us directly by phone or in writing], you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a recent utility or credit card bill); and
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We are not obligated to make a data access disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with you request will be used solely for the purposes of verification.

**8. Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding your verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. If you have requested a copy of your data in portable form, we will select a format to provide your personal information.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **9. Changes to our Privacy Notice**

We reserve the right to amend this California Residence Privacy Notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website.

Last Updated 08.21.2020