



California Consumer Privacy Act (CCPA) Policy

CALIFORNIA CONSUMER PRIVACY ACT (“CCPA”) POLICY

*ONLY APPLICABLE TO CALIFORNIA CONSUMERS

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ARTICLE I. PURPOSE

California Consumer Privacy Act of 2018 ("CCPA")

The CCPA was enacted to enhance privacy rights and provide additional consumer protection for California residents.

CCMR3, LLC ("CCMR3") implements this policy to enable CCMR3 employees and management to collect debts from California consumers in compliance with the CCPA. This policy will be reviewed and updated as necessary.

ARTICLE II. SCOPE

This policy includes in scope: All CCMR3 management and employees with respect to California consumers.

ARTICLE III. CCPA STATUTORY TEXT AND DEFINITIONS

Section 3.01 CCPA Statutory Text

TITLE 1.81.5. California Consumer Privacy Act of 2018 can be found here:

http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=3.&title=1.81.5.&part=4.&chapter=&article

Section 3.02 CALIFORNIA ATTORNEY GENERAL CCPA REGULATIONS

Revised: 4/1/2023
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CCMR3, LLC – CCPA Policy

On August 14, 2020, the Office of Administrative Law (OAL) approved the Department of Justice’s regulations regarding the CCPA. These CCPA Regulations can be found here: <https://oag.ca.gov/privacy/ccpa/regs>

Section 3.03 DEFINITIONS

This Policy references various CCPA-defined terms. Full definitions are located in CCPA Section 1798.140 and can be found here: http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CIV§ionNum=1798.140.

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information includes, but is not limited to, the following if it identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household.

“Consumer(s)” referenced in this Policy specifically refers to only California consumers.

ARTICLE IV. TYPES OF PERSONAL INFORMATION CCMR3 RECEIVES, COLLECTS, AND USES

As required by the CCPA, CCMR3’s management team conducted a comprehensive review of the types of Personal Information CCMR3 receives, collects and/or uses in the course of collecting debts from California consumers. CCMR3 identified the following:

CCPA Categories	CCMR3 Receives/Collects/Uses
Identifiers	Name, address, email address, Social Security number, signature, date of birth, IP Address, or other similar identifier
Personal Information	Contact and financial information
Protected Classifications Under California or Federal Law	Age, marital status, sex, and veteran or military
Commercial Information	Information about past consumer debts or transactions
Internet or Similar Network Activity Information	Information about a consumer’s interaction with our website
Audio, Electronic, Visual, or Similar Information	Call recordings

Inferences Drawn From Other Personal Information	Certain inferences concerning a consumer’s preferences or characteristics
Professional or employmentrelated information	Information related to employment

CCMR3/s management will actively review and update this list as needed.

ARTICLE V. PROCEDURES TO COMPLY WITH NOTICE REQUIREMENTS

5.01 Notice of Privacy Policy- CCMR3 shall provide a privacy policy in accordance with the CCPA and section 999.308

5.02 Notice at or before Point of Collection

CCMR3 shall provide consumers with timely notice, at or before the point of collection, about the categories of Personal Information it will collect from them and the purposes for which the Personal Information will be used.

5.03 Notice of Right to Opt-Out of Sale of Personal Information

Section 5.01 Notice of Privacy Policy

CCMR3’s privacy policy shall provide consumers with a comprehensive description of CCMR3’s online and offline practices regarding the collection, use, and disclosure of Personal Information and of the rights of consumers regarding their personal information.

- (a) CCMR3’s privacy policy shall be designed and presented in a way that is easy to read and understandable to consumers. The policy shall:
 1. Use plain, straightforward language and avoid technical or legal jargon.
 2. Use a format that makes the policy readable.
 3. Be reasonably accessible to consumers with disabilities.
 4. Be available in a format that allows a consumer to print it out as a document.
- (b) CCMR3’s privacy policy shall be posted online through a conspicuous link using the word “privacy” on its website homepage.

(c) CCMR3's privacy policy shall include the following information:

1. **Right to Know About Personal Information Collected, Disclosed, or Sold.**
 - a. Explanation that a consumer has the right to request that CCMR3 disclose what Personal Information it collects, uses, discloses, and sells.
 - b. Instructions for submitting a verifiable consumer request to know and links to an online request form.
 - c. General description of the process CCMR3 will use to verify the consumer request, including any information the consumer must provide.
 - d. Identification of the categories of Personal Information CCMR3 has collected about consumers in the preceding 12 months. The categories shall be described in a manner that provides consumers a meaningful understanding of the information being collected.
 - e. Identification of the categories of sources from which the Personal Information is collected.
 - f. Identification of the business or commercial purpose for collecting or selling personal information. The purpose shall be described in a manner that provides consumers a meaningful understanding of why the information is collected or sold.
 - g. A statement that CCMR3 does not sell Personal Information.
2. **Right to Request Deletion of Personal Information.**
 - a. Explanation that the consumer has a right to request the deletion of certain Personal Information collected by CCMR3, subject to exclusions for Personal Information required to fulfill its business purpose of debt collection.
 - b. Instructions for submitting a verifiable consumer request to delete and links to an online request form.
 - c. General description of the process CCMR3 will use to verify the consumer's request to delete, including any information the consumer must provide.
3. **Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights.**
 - a. Explanation that the consumer has a right not to receive discriminatory treatment by CCMR3 for the exercise of the privacy rights conferred by the CCPA.

4. **Authorized Agent.**
 - a. Instructions on how an authorized agent can make a request under the CCPA on the consumer's behalf.
5. **Contact for More Information.**
 - a. A contact for questions or concerns about CCMR3's privacy policies and practices using a method reflecting the manner in which CCMR3 primarily interacts with the consumer.
6. **Date the privacy policy was last updated.**

Section 5.02 Notice at or Before Point of Collection

CCMR3 shall provide consumers with timely notice, at or before the point of collection, about the categories of Personal Information it will collect from them and the purposes for which the Personal Information will be used.

1. The notice shall:
 - a. Use plain, straightforward language and avoid technical or legal jargon.
 - b. Use a format that draws the consumer's attention to the notice and makes the notice readable, including on smaller screens, if applicable.
 - c. Be reasonably accessible to consumers with disabilities.
2. The 'notice at collection' shall be made at the time CCMR3 sends its initial notice to the consumer.
3. CCMR3 shall not collect categories of Personal Information other than those disclosed in the notice at collection.
4. The "notice at collection" shall include the following:
 - a. A list of the categories of Personal Information to be collected. Each category of Personal Information shall be written in a manner that provides consumers a meaningful understanding of the information being collected.
 - b. The business or commercial purpose(s) for which the categories of Personal Information will be used.
 - c. Instructions on how CCMR3's privacy policy can be found online.

CCMR3 does not sell any Personal Information.

As required by the CCPA, CCMR3 shall disclose the following in its Privacy Policy: “CCMR3 does not sell Personal Information.”

If CCMR3 begins, at any time, to sell any Personal Information, it shall immediately notify all applicable consumers.

ARTICLE VI. METHODS AVAILABLE FOR CALIFORNIA CONSUMERS TO SUBMIT REQUESTS

CCMR3 shall designate at least two methods for consumers to submit their request. CCMR3’s current methods are:

1. Email address

- a. Consumers may send their requests to help@ccmr3.com. A member from CCMR3’s management team is responsible for monitoring this email address and notating each request received.

2. Phone

- a. Consumers may submit their request via phone: 866-272-4035

ARTICLE VII. PROCEDURES TO RESPOND TO CONSUMER REQUESTS

IN GENERAL

- (1) **Cost:** CCMR3 shall not charge a consumer or its agent for responding to Requests.
- (2) **Confirmation of Request, Timing, and Verification:** CCMR3 shall respond to consumer requests within 45 calendar days of receipt of the request. CCMR3 may extend that deadline by another 45 days (90 days total) if CCMR3 notifies the consumer.
 - a. Upon receiving a request to know or a request to delete, CCMR3 shall confirm receipt of the request within 10 business days and provide information about how CCMR3 will process the request. The information provided shall describe in general CCMR3’s verification process and when the consumer should expect a response, except in instances where CCMR3 has already granted or denied the request. The confirmation may be given in the same

manner in which the request was received. For example, if the request is made over the phone, the confirmation may be given orally during the phone call.

- b. CCMR3 shall respond to requests to know and requests to delete within 45 calendar days. The 45-day period will begin on the day CCMR3 receives the request, regardless of time required to verify the request. If CCMR3 cannot verify the consumer within the 45-day time period, CCMR3 may deny the request. If necessary, CCMR3 may take up to an additional 45 calendar days to respond to the consumer's request, for a maximum total of 90 calendar days from the day the request is received, provided that CCMR3 provides the consumer with notice and an explanation of the reason CCMR3 will take more than 45 days to respond to the request.

RESPONDING TO REQUESTS TO KNOW

- (1) For requests that seek the disclosure of specific pieces of information about the consumer, if CCMR3 cannot verify the identity of the person making the request pursuant to the CCPA's Regulations, CCMR3 shall not disclose any specific pieces of Personal Information to the requestor and shall inform the requestor that it cannot verify their identity. If the request is denied in whole or in part, CCMR3 shall also evaluate the consumer's request as if it is seeking the disclosure of categories of Personal Information about the consumer as explained in (2) below.
- (2) For requests that seek the disclosure of categories of Personal Information about the consumer, if CCMR3 cannot verify the identity of the person making the request pursuant to the CCPA's Regulations, CCMR3 may deny the request to disclose the categories and other information requested and shall inform the requestor that it cannot verify their identity. If the request is denied in whole or in part, CCMR3 shall provide or direct the consumer to its general business practices regarding the collection, maintenance, and sale of Personal Information set forth in its privacy policy.
- (3) In responding to a request to know, CCMR3 is not required to search for Personal Information if all of the following conditions are met:
 - a. CCMR3 does not maintain the Personal Information in a searchable or reasonably accessible format;
 - b. CCMR3 maintains the Personal Information solely for legal or compliance purposes;
 - c. CCMR3 does not sell the Personal Information and does not use it for any commercial purpose; and
 - d. CCMR3 describes to the consumer the categories of records that may contain Personal Information that it did not search because it meets the conditions stated above.

- (4) CCMR3 shall not disclose in response to a request to know a consumer’s Social Security number, driver’s license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. CCMR3 shall, however, inform the consumer with sufficient particularity that it has collected the type of information. For example, a business shall respond that it collects “unique biometric data including a fingerprint scan” without disclosing the actual fingerprint scan data.
- (5) If CCMR3 denies a consumer’s verified request to know specific pieces of personal information, in whole or in part, because of a conflict with federal or state law, or an exception to the CCPA, CCMR3 shall inform the requestor and explain the basis for the denial, unless prohibited from doing so by law. If the request is denied only in part, CCMR3 shall disclose the other information sought by the consumer.
- (6) CCMR3 shall use reasonable security measures when transmitting Personal Information to the consumer.
- (7) If CCMR3 maintains a password-protected account with the consumer, it may comply with a request to know by using a secure self-service portal for consumers to access, view, and receive a portable copy of their Personal Information if the portal fully discloses the Personal Information that the consumer is entitled to under the CCPA and the California AG’s CCPA Regulations, uses reasonable data security controls, and complies with the verification requirements set forth the CCPA Regulations.
- (8) Unless otherwise specified by CCMR3 to cover a longer period of time, the 12-month period covered by a consumer’s verifiable request to know referenced in Civil Code section 1798.130, subdivision (a)(2), shall run from the date CCMR3 receives the request, regardless of the time required to verify the request.
- (9) In responding to a consumer’s verified request to know categories of Personal Information, categories of sources, and/or categories of third parties, CCMR3 shall provide an individualized response to the consumer as required by the CCPA. It shall not refer the consumer to CCMR3’s general practices outlined in its privacy policy unless its response would be the same for all consumers and the privacy policy discloses all the information that is otherwise required to be in a response to a request to know such categories.
- (10) In responding to a verified request to know categories of Personal Information, CCMR3 shall provide:
 - a. The categories of Personal Information CCMR3 has collected about the consumer in the preceding 12 months;

- b. The categories of sources from which the Personal Information was collected;
 - c. The business or commercial purpose for which it collected or sold the personal information;
 - d. The categories of third parties with whom CCMR3 shares personal information; and
 - e. The categories of Personal Information that CCMR3 disclosed for a business purpose in the preceding 12 months, and for each category identified, the categories of third parties to whom it disclosed that particular category of personal information.
- (11) CCMR3 shall identify the categories of personal information, categories of sources of personal information, and categories of third parties to whom CCMR3 disclosed personal information, in a manner that provides consumers a meaningful understanding of the categories listed.

RESPONDING TO REQUESTS TO DELETE

- (1) For requests to delete, if CCMR3 cannot verify the identity of the requestor pursuant to the CCPA Regulations, CCMR3 may deny the request to delete. CCMR3 shall inform the requestor that their identity cannot be verified.
- (2) CCMR3 shall comply with a consumer's request to delete their Personal Information by:
- a. Permanently and completely erasing the Personal Information on its existing systems with the exception of archived or back-up systems;
 - b. Deidentifying the personal information; or
 - c. Aggregating the consumer information.
- (3) If CCMR3 stores any Personal Information on archived or backup systems, it may delay compliance with the consumer's request to delete, with respect to data stored on the archived or backup system, until the archived or backup system relating to that data is restored to an active system or next accessed or used for a sale, disclosure, or commercial purpose.
- (4) In responding to a request to delete, CCMR3 shall inform the consumer whether or not it has complied with the consumer's request.
- (5) If CCMR3 complies with the consumer's request, CCMR3 shall inform the consumer that it will maintain a record of the request as required by section 999.317, subsection (b). CCMR3 may retain a record of the request for the purpose of ensuring that the consumer's Personal Information remains deleted from CCMR3's records.

- (6) In cases where CCMR3 denies a consumer's request to delete, CCMR3 shall do all of the following:
- a. Inform the consumer that it will not comply with the consumer's request and describe the basis for the denial, including any conflict with federal or state law, or exception to the CCPA, unless prohibited from doing so by law;
 - b. Delete the consumer's Personal Information that is not subject to the exception; and
 - c. Not use the consumer's Personal Information retained for any other purpose than provided for by that exception.
- (8) In responding to a request to delete, CCMR3 may present the consumer with the choice to delete select portions of their Personal Information only if a global option to delete all Personal Information is also offered and more prominently presented than the other choices.

CCMR3 MAY DENY CERTAIN CONSUMER REQUESTS

CCMR3 may deny a consumer's request for the following reasons:

1. CCMR3 cannot verify the consumer's request.
2. The request is manifestly unfounded or excessive, or CCMR3 has already provided Personal Information to the consumer more than twice in a 12-month period.
3. CCMR3 will not disclose certain sensitive information, such as a consumer's social security number, financial account number, or account passwords, but CCMR3 will provide a response that states the general category of information collected.
4. Disclosure would restrict CCMR3's ability to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
5. If the Personal Information is certain medical information, consumer credit reporting information, or other types of information exempt from the CCPA.
6. If the Personal Information is needed to enable CCMR3 to complete its business purpose (to collect debts).
7. Additional reasons listed in Civil Code section 1798.145.

ARTICLE VIII. CCMR3'S ROLE AS A "SERVICE PROVIDER" TO ITS CREDITOR CLIENTS

In the event CCMR3 meets the definition of a "Service Provider" under the CCPA regarding the services it provides to its creditor clients, it will comply with the following obligations:

- (a) In its role as a Service Provider, CCMR3 shall not retain, use, or disclose Personal Information obtained in the course of providing services except:
- (1) To process or maintain Personal Information on behalf of the business that provided the Personal Information or directed CCMR3 to collect the personal

information, and in compliance with the written contract for services required by the CCPA;

- (2) To retain and employ another Service Provider as a subcontractor, where the subcontractor meets the requirements for a service provider under the CCPA and these regulations;
 - (3) For internal use by CCMR3 to build or improve the quality of its services, provided that the use does not include building or modifying household or consumer profiles to use in providing services to another business, or correcting or augmenting data acquired from another source;
 - (4) To detect data security incidents or protect against fraudulent or illegal activity; or
 - (5) For the purposes enumerated in Civil Code section 1798.145, subdivisions (a)(1) through (a)(4).
- (b) In its role as a Service Provider, if CCMR3 receives a request to know or a request to delete from a consumer, CCMR3 shall either act on behalf of its creditor client in responding to the request or inform the consumer that the request cannot be acted upon because the request was sent to CCMR3 in its role as a service provider for its creditor client(s).

ARTICLE IX. RECORD RETENTION

- (a) All CCMR3 employees responsible for handling consumer inquiries about CCMR3's privacy practices or CCMR3's compliance with the CCPA shall be informed of all of the requirements in the CCPA and the CCPA Regulations and how to direct consumers to exercise their rights under the CCPA and CCPA Regulations.
- (b) CCMR3 shall maintain records of consumer requests made pursuant to the CCPA and how it responded to the requests for at least 24 months. CCMR3 shall implement and maintain reasonable security procedures and practices in maintaining these records.
- (c) The records may be maintained in a ticket or log format provided that the ticket or log includes the date of request, nature of request, manner in which the request was made, the date of CCMR3's response, the nature of the response, and the basis for the denial of the request if the request is denied in whole or in part.
- (d) CCMR3's maintenance of the information required by this Record Retention section, where that information is not used for any other purpose, does not taken alone violate the CCPA or CCPA Regulations.
- (e) Information maintained for record-keeping purposes shall not be used for any other purpose except as reasonably necessary for CCMR3 to review and modify its processes for compliance with the CCPA and CCPA Regulations. Information maintained for

recordkeeping purposes shall not be shared with any third party except as necessary to comply with a legal obligation.

- (f) Other than as required by subsection (b), CCMR3 is not required to retain Personal Information solely for the purpose of fulfilling a consumer request made under the CCPA.

ARTICLE X. RAMIFICATIONS

Non-compliance with this Policy will be considered a major non-conformity.