

CONSUEGRA & DUFFY PRIVACY POLICY

This Privacy Policy discloses the privacy practices of CONSUEGRA & DUFFY P.L.L.C. (“CONSUEGRA & DUFFY”, “us,” or “we”). We are committed to protecting your privacy. As one of the nation’s leaders in the debt collection and receivables management industry, CONSUEGRA & DUFFY recognizes and respects the privacy expectations of today’s consumers and the requirements of applicable federal and state privacy laws. We believe that making you aware of how we collect and use your non-public personal information (Personal Information), and to whom it is disclosed will form the basis for a relationship of trust between the public and us. This Privacy Policy provides that explanation.

CONSUEGRA & DUFFY ’s website is located at www.consuegralaw.com (its “website”) and is not intended for individuals less than the age of eighteen. CONSUEGRA & DUFFY does not knowingly collect data relating to individuals less than the age of eighteen.

Nothing in this Privacy Notice is intended to contradict your rights under the Fair Debt Collection Practices Act. We will not disclose any information to third parties that is otherwise prohibited by the FDCPA.

Your access to and use of the Website is conditional upon your acceptance of and compliance with this Privacy Policy. This Privacy Policy applies to everyone, including, but not limited to visitors, users, and others, who wish to access or use the Website. By accessing or using the website, you agree to be bound by this Privacy Policy. If you disagree with any part of the Privacy Policy, then you do not have our permission to access or use the website.

DATA CONTROLLER

CONSUEGRA & DUFFY is the data controller.

Questions, comments, and complaints about CONSUEGRA & DUFFY ’s data practices can be submitted to:

CONSUEGRA & DUFFY, P.L.L.C,

9210 King Palm Dr.

Tampa, FL 33619

Toll-free Telephone Number: 866-798-9110

INFORMATION WE COLLECT

We may have collected the following categories of personal information from consumers within the last 12 months:

Categories of Personal Information	Examples of Specific Types of Personal Information Collected	Collected
A. Identifiers	A real name, alias, postal address, email address, telephone numbers, Internet Protocol address, account number, Social Security number, date of birth, or other similar identifiers.	Yes
B. Personal Information categories	A name, signature, Social Security number, physical characteristics or description, address, telephone number, , education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. Yes	Yes
C. Protected classification characteristics	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.	Yes
E. Internet or other electronic network activity information	Browsing history, search history, IP address, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Yes
F. Geolocation data	Physical location or movements.	Yes
G. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
H. Professional or employment-related information	Current or past job history.	Yes
I. Non-public education	Education records directly related to a student maintained by an educational institution or party acting	No

information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	
J. 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/	Yes

COOKIES

A cookie is a small piece of data sent from a website and stored on your computer by your web browser. The file is added once you agree to store cookies on your computer or device, and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow sites to respond to you as an individual. The website can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

This website collects cookies and may use cookies for reasons including, but not limited to:

- Analyze our web traffic using an analytics package.
- Identify if you are signed-in to the Website.
- Test content on the Website.
- Store information about your preferences.
- Recognize when you return to the Website.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This setting may prevent you from taking full advantage of the website.

LOG FILE INFORMATION

Log file information is automatically reported by your browser each time you access a web page. When you register with or view our services, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include

information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such information.

HOW WE USE YOUR INFORMATION

Personal information is collected solely for the purpose of debt recovery in a lawful manner and remains part of our records until we determine the information is no longer needed, or we are required by law to delete such information. We will collect the minimum amount of data necessary to collect a debt.

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. We do not sell and will not sell your personal information obtained from our website.

Personal information is collected remains part of our records until we determine the information is no longer needed, or we are required by law to delete such information. We will collect the minimum amount of data necessary to provide the services.

When you use our services, we may automatically record your account transactions, transaction location, and computer or access device.

HOW WE COLLECT YOUR INFORMATION

We collect most of this personal information directly from our clients for whom we provide services to, as well as from you by telephone, written correspondence through the mail, email or fax, by viewing 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 your transactions with us;
- From our service providers (e.g., letter vendor, location vendors, payment processing vendors, call analytics vendor, and/or electronic signature service provider);
- Filling out forms through our services;
- Responses to customer surveys;
- Communications with our customer service team;
- From a third party with your consent (e.g., your authorized representative and/or attorney) or directly from a third party (e.g., third parties contacted during location activities pursuant to 15 U.S.C. §1692b, such as your friends, neighbors, relatives, and/or employer);
- Consumer reporting agencies (CRAs); and
- From activity on our website.

HOW WE SHARE YOUR INFORMATION

CONSUEGRA & DUFFY may share personally identifiable information it collects with its employees who need to know that information to service your account. Except as provided below, CONSUEGRA & DUFFY does not share or disclose any personally identifiable information to any company or marketing group external to CONSUEGRA & DUFFY. CONSUEGRA & DUFFY may share your personal information with third parties to the extent it is not prohibited by law from doing so and reasonably necessary to manage or service your account, verify employment, determine location, process payment, fulfill a transaction, provide customer service, provide mailing services, administer and maintain databases containing your account, or as otherwise authorized by law.

Further, CONSUEGRA & DUFFY may disclose personally identifiable information (i) to another entity with which CONSUEGRA & DUFFY enters or reasonably may enter into a corporate transaction, such as, for example, a merger, consolidation, acquisition, or asset purchase, (ii) to a third party pursuant to a subpoena, court order, or other form of legal process or in response to a request by or on behalf of any local, state, federal, or other government agency, department, or body, whether or not pursuant to a subpoena, court order, or other form of legal process, or in connection with litigation brought against, or on behalf of, CONSUEGRA & DUFFY, where appropriate, (iii) to a third party if determined by CONSUEGRA & DUFFY in its sole judgment that such disclosure is appropriate to protect the life, health, or property of CONSUEGRA & DUFFY or any other person or entity, all in compliance with applicable law, (iv) to third parties as authorized or designated by you, or (v) to conduct any other legitimate business activity not otherwise prohibited by law. The foregoing is not intended to obviate or displace any legal obligations or duties applicable to CONSUEGRA & DUFFY.

Except as necessary for CONSUEGRA & DUFFY to provide the services, information, or products requested by a website user, or except for the disclosures identified in the preceding paragraphs, the user may opt out of having his or her personally identifiable information, which has been voluntarily provided to CONSUEGRA & DUFFY through or from its website, prospectively retained by CONSUEGRA & DUFFY, used by CONSUEGRA & DUFFY for secondary purposes, or disclosed by CONSUEGRA & DUFFY to third parties.

E-mail posted or sent to CONSUEGRA & DUFFY may not be secure against interception by unauthorized individuals. To protect against interception by unauthorized individuals, or because we cannot verify your identity, we may be unable to respond to e-mail requests concerning accounts placed for collection unless you have requested or authorized us to do so.

SALE OF PERSONAL INFORMATION

We do not sell and will not sell your personal information obtained from our website.

SHARING YOUR INFORMATION WITH CONSUMER REPORTING AGENCIES

Consumer Reporting Agencies (CRAs) collect and maintain information on consumer and business credit profiles on behalf of organizations in the United States. We may share information about you with CRAs and may carry out periodic searches with them to verify your identity or manage your account.

Details of your account(s) with us may be sent to CRAs and recorded by them. This information may be supplied by CRAs and may be used and searched by us and other organizations, such as debt collection agencies, in order to:

- consider applications for credit and credit related services;
- locate debtors and recover debts; and
- manage your accounts.

You have a right to obtain an annual copy of your credit file from CRAs by visiting <https://www.annualcreditreport.com>.

YOUR CHOICES

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Details of your account(s) with us may be sent to CRAs and recorded by them. This information may be supplied by CRAs and may be used and searched by us and other organizations, such as debt collection agencies, in order to:

- consider applications for credit and credit related services;
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- manage your accounts.

You have a right to obtain an annual copy of your credit file from CRAs by visiting <https://www.annualcreditreport.com>.

HOW LONG WE KEEP YOUR INFORMATION

CONSUEGRA & DUFFY will retain your personal data until we determine the information is no longer needed, or as otherwise required by law.

HOW WE PROTECT INFORMATION

CONSUEGRA & DUFFY has implemented physical, electronic, and procedural security safeguards to protect against the unauthorized release of or access to personal information. We employ internal and external system safeguards designed to protect confidentiality and security of personal information.

The confidentiality of any communication or material transmitted to or from CONSUEGRA & DUFFY via the website or via e-mail cannot be, and is not, guaranteed. You acknowledge that the technical processing and transmission of the website's content may be transferred unencrypted and involve: (a) transmissions over various networks; and (b) changes to confirm and adapt to technical requirements of connecting networks or devices.

We will collect the IP Address of all visitors to the CONSUEGRA & DUFFY website for internal security and other proprietary purposes. We do not release this data outside of our corporate team nor utilize the data other than for internal purposes.

If any questions arise about security, please contact CONSUEGRA & DUFFY using the information provided above.

CALIFORNIA RESIDENTS – YOUR LEGAL RIGHTS

- **The right to access personal information** – You have the right to request access to your personal information that we collected about you, subject to certain exceptions.
- **The right to request deletion of personal information** – You have the right to request that we delete your personal information, however, state and federal law may prohibit us from deleting personal information, which CONSUEGRA & DUFFY will disclose to you.
- **The right to non-discrimination** – We will not discriminate against you if you exercise any of these rights.
- **The right to an authorized agent** – You can designate an authorized agent to make any of these requests by providing your express written authorization. We must be able to verify your identity and the authorization must include the authorized agent's name, address, telephone number, and email address (for providing the personal information collected or to respond to a request for deletion).

If you wish to exercise any of these rights, please contact CONSUEGRA & DUFFY by doing one of the following:

1. Submit online to customer.service@consuegralaw.com (E-mail address);
2. By mailing a request to: CONSUEGRA & DUFFY, 9210 King Palm Dr., Tampa, FL 33619;
3. Toll-free Telephone Number: 866-798-9110

If you choose to contact directly by email/phone/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 copy of your driving license or passport and 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 or data portability 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.

CHILDREN'S PRIVACY

This Website is intended for use by a general audience and does not offer services to children. The Website does not knowingly collect or solicit information from anyone under the age of 18 to sign up for or utilize the Website or any associated services.

LINKS TO OTHER WEBSITES

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

PRIVACY NOTICE CHANGES

CONSUEGRA & DUFFY may change this Privacy Notice at any time. Notice of any new or revised Privacy Notice, as well as the location of the new or revised statement, will be posted on the website after the change. It is the obligation of users visiting the website before the change to learn of changes to the Privacy Notice since their last visit.

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