PRIVACY POLICY FOR CALIFORNIA CONSUMERS

Last Updated: June 30th, 2025

(To obtain a copy of this notice in an alternative format please phone us at 877-730-3128 or email us at Customerservice@JenkaGroup.com. You can also click here to download a PDF File of the notice.)

This Policy is provided by Jenka Group, Inc., Inc. ("we," "us," or "our") pursuant to the California Consumer Privacy Act ("CCPA") as amended by the California Privacy Rights Act ("CPRA") (the CCPA and CPRA are collectively referred to herein as the "Privacy Act"). This Policy applies solely to information about California residents ("Consumers" or "you") and their "Personal Information" as that term is defined in the Privacy Act. The Privacy Act requires us to make certain disclosures to Consumers and to provide Consumers with the ability to request certain information about their Personal Information. This Policy is intended to comply with those requirements and explain how Consumers may submit a request to exercise their rights regarding their Personal Information.

Please note that the rights under the Privacy Act do not apply to:

- Personal Information collected, processed, sold or disclosed subject to the federal Gramm-Leach-Bliley Act (Public Law 106-102) and implementing regulations;
- Personal Information bearing on a consumer's creditworthiness, credit standing, and credit capacity collected, maintained, used, communicated, disclosed or sold in accordance with the Fair Credit Reporting Act, Section 1681 et seq., Title 15 of the United States Code; and
- Medical information collected by a covered entity or business associate governed by the federal Health Insurance Portability and Accountability Act of 1996 (Public Law 104-191).

CATEGORIES OF PERSONAL INFORMATION COLLECTED

The categories of Personal Information we have collected about Consumers in the preceding twelve (12) months include:

- Identifiers such as name, postal address, date of birth, telephone number, email address or other similar identifiers;
- Certain sensitive Personal Information limited to social security number, driver's license number or other state identification number, account numbers, and precise geolocation;
- Characteristics such as age or gender;
- Retail information, such as products or services purchased;
- Internet activity information such as geolocation data and information regarding your interaction with our website or payment portal, including any online payments made;
- Audio data such as recordings made when consumers have a telephone conversation with us;
- Professional and employment related information such as your employer's name and address;
- Educational information, such as institutions attended;
- Biometric information such as physical descriptions and photos as well as voice recordings; and
- Health insurance information if we are collecting medical debt.

SOURCES OF PERSONAL INFORMATION

We obtain the categories of Personal Information identified above from the following categories of sources:

- Directly from you, such as when you contact us and communicate information about yourself;

- Indirectly from you such as when you visit our website or payment portal;
- Your creditor on whose behalf we are attempting to collect a debt;
- Service Providers or other companies we work with, based on our relationship with them and as permitted by law, such as credit bureaus and other skip-tracing sources.

USE OF PERSONAL INFORMATION

All Personal Information collected by us will be used for debt collection purposes. We do not currently sell Personal Information, nor have we sold Personal Information in the last twelve (12) months. Furthermore, we will not sell Personal Information in the future without providing prior notice and an opportunity to opt-out.

DISCLOSURE OF PERSONAL INFORMATION

Within the last twelve (12) months, each of the categories of Personal Information identified above was disclosed for a business purpose to the following categories of persons: service providers, applicable law enforcement and government agencies, outside professional advisors (e.g. accountants, auditors, lawyers), and Consumers' creditors on whose behalf we were retained to collect a debt.

RETENTION OF PERSONAL INFORMATION

We retain Personal Information for as long as necessary to fulfill the purpose for which it was obtained unless a longer retention period is required by law. The criteria used to determine our retention period include:

- The length of time your account is placed with us for collection;
- Whether there is a legal obligation to which we are subject (for example, certain laws, including the federal Fair Debt Collection Practices Act, require us to keep records for a certain period of time before we can delete them); and
- Whether retention is advisable based on our legal position, such as applicable statutes of limitations, litigation, or regulatory investigations.

YOUR RIGHTS UNDER THE PRIVACY ACT

The Privacy Act provides you with various rights related to your Personal Information. Your rights are explained in more detail below:

A. **RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED OR SOLD**

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your Personal Information. Upon our receipt of a verifiable request from you, we will disclose the following information to you:

1. The categories of Personal Information we have collected about you;
2. The categories of sources from which the Personal Information is collected;
3. Our business or commercial purpose for collecting, selling, or sharing your Personal Information;
4. The categories of third parties to whom we disclose your Personal Information; and
5. The specific pieces of Personal Information we have collected about you.

You have the right to request that we disclose what Personal Information we disclose for a business purpose. Upon our receipt of a verifiable request from you for such information, we will disclose the following information to you:

1. The categories of Personal Information that we have collected about you; and
2. The categories of Personal Information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

You have the right to request that we disclose what Personal Information we sell or share and to whom. The Privacy Act defines "sell" as disclosure of Personal Information to a Third Party for monetary or other valuable consideration. The Privacy Act defines "share" as disclosure of Personal Information to a Third Party for cross-context behavioral advertising. We do not sell or share your Personal Information and will not sell or share your Personal Information without providing you with prior notice and an opportunity to opt-out.

B. RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION

Subject to certain exceptions, you have the right to request that we delete Personal Information we have collected and maintained about you. Upon verification, we will delete your Personal Information unless an exception applies.

C. RIGHT TO REQUEST CORRECTION OF INACCURATE PERSONAL INFORMATION

You have the right to request we correct inaccurate Personal Information. Upon our receipt of a verifiable request from you to correct inaccurate Personal Information, we shall use commercially reasonable efforts to correct the inaccurate personal information.

D. HOW TO SUBMIT A REQUEST

You can submit any of the requests outlined above by either:

- Calling us at 877-730-3128 Monday through Friday 8:30 a.m. to 5:30 p.m. CST
- Emailing your request to: Customerservice@JenkaGroup.com or
- Mailing a request to: 132 N 3rd Street DeKalb IL 60115

To help us ensure consumer privacy and security, we will take steps to verify your identity before granting you access to your Personal Information or complying with your request. If you make a request, we may require you to provide one or more pieces of Personal Information, including your: name, date of birth, social security number, email address, telephone number, and/or postal address. We will only use Personal Information provided in a verifiable Consumer request to verify the requester's identity or authority to make the request. Making a verifiable Consumer request does not require you to create an account with us.

When submitting a request, please describe your request with sufficient detail and provide sufficient identifiers to allow us to properly understand and process it.

We do not charge a fee to process and respond to a verifiable Consumer request unless it is manifestly unfounded or excessive. If we determine that a request is manifestly unfounded or

excessive, we will alert you to that decision and either charge you a reasonable fee to complete the request or refuse to act on the request.

E. **REQUESTS SUBMITTED THROUGH AN AUTHORIZED AGENT**

Only you, or a person legally authorized to act on your behalf, may make a verifiable Consumer request to know, delete or correct your Personal Information. In order for an authorized agent to make a request on your behalf, please email or mail us a power of attorney or other written authorization authorizing an agent to make a request.

F. **RIGHT TO OPT-OUT OF THE SALE OF PERSONAL INFORMATION**

You have the right to opt-out of the sale of your Personal Information. We do not sell Personal Information and will not in the future sell your Personal Information without providing you with prior notice and an opportunity to opt-out.

G. **RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF YOUR PRIVACY RIGHTS**

You have the right not to receive discriminatory treatment by us for exercising the privacy rights conferred by the Privacy Act. Discriminatory treatment includes, but is not limited to:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing a different level or quality of goods or services to you; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

CHANGES TO PRIVACY POLICY

We reserve the right to amend this Policy from time to time at our discretion and/or to comply with changes in the law. When we make changes to the Policy, we will post the updated Policy on our website at www.jenkagroup.com/privacy and/or mail an updated Policy to you.

QUESTIONS OR CONCERNS

- If you have any questions or concerns about this Policy or our privacy practices, or if you would like to request that this Policy be provided in an alternative format, please email us at Customerservice@JenkaGroup.com or call us at 877-730-3128 Monday through Friday 8:30 a.m. to 5:30 p.m. CST