

# DEBTCLEANSE Privacy Policy

Effective Date: March 17, 2020

This DebtCleanse Privacy Policy explains what information DebtCleanse may collect or gather from you on or through the websites and how we will use and protect your information. This Privacy Policy is part of our Terms of Use, and all the terms and conditions set forth in the Terms of Use also apply to this Privacy Policy. Capitalized terms that are not otherwise defined in this Privacy Policy have the meanings given to them in the Terms of Use.

IF YOU DO NOT UNDERSTAND OR DO NOT AGREE WITH THE TERMS OF THIS  
PRIVACY POLICY PLEASE DO NOT USE THE WEBSITE

## **Your Consent**

You will be deemed to have consented to the terms of this Privacy Policy by using the Site in any way, even just browsing. We may also ask you to indicate your consent more formally by checking a box or otherwise taking an affirmative action.

## **Changes to Privacy Policy**

We will change this Privacy Policy from time to time to reflect changes in our business, technology and the law. If you have consented merely by using the Site – and / or affirmatively indicating you accept “cookies” (as discussed below), then we will not necessarily notify you of the changes. If you have consented more formally, as described above, then the changes will not become effective until we have asked you for, and obtained, your consent. We will notify our members through emails in our third-party communication system (“HubSpot”) and / or by posting on our website.

## **Personal Information We Collect**

We collect a variety of personal information to operate the Site and provide the Services, including:

- Your name, address, phone number(s), email address, birth date, and other personal information.
- Financial information, including your social security number, income, and reason for debt/financial hardship.
- Information regarding the types and details of your debts and credit accounts to include, but not limited to name of creditor, account number and debt amount.
- Information regarding creditors’ collection efforts.
- Information regarding your credit report.
- Your username and password.
- Your spouses’ name and social security number (to allow him or her access to the member benefits)
- Information to confirm your identity, such as a completed electronic check transaction or a credit report.
- Your W-9 form.

- Information to confirm your place of residence.
- Information about your use of the Site.
- Information about your computer configuration.
- Information to confirm your relationship with other parties associated with the Site.
- Information about your debit, credit card, bank accounts or other sources of payment for our services.
- Your IP addresses.
- We record the calls we make or respond to, for training purposes, to improve our service quality and to assure compliance with laws regarding telephonic marketing.

### **How We Use Your Personal Information**

We use your personal information to:

- Verify that you are permitted to use the Site.
- Keep track of your debts for your and your attorney's use.
- Guide you in choosing the attorney and law firm best suited to your specific debt issues.
- Guard against fraud.
- Comply with applicable law.
- Answer your questions.
- Protect our rights.
- Send to third parties at your request.
- Process your transactions at the Site.
- Determine whether your computer information is compatible with the Site.
- Keep track of your use of the Site.
- Notify you of changes or updates to your membership
- Send you information about your membership.
- Analyze use of the Site.
- Improve the Site.
- Send you information about the Site.
- Send you materials about us.
- Other purposes we disclose to you.

### **What We Provide to Third Parties**

We do not provide any third party with any of your personal information except in these situations:

- We use third parties to perform services for the Site, such as hosting services, electronic signature providers, electronic payment service providers, and services that obtain contact information of people who have expressed interest in obtaining legal assistance to address debt situations. Each of these third parties may require some of your personal and/or financial information to perform their services.

- If you sign up, we may identify you on tax returns and other government forms.
- We will provide information if we believe we are required to do so by law.
- If you choose to participate in discussions or messages boards at the Site, other users may be able to see your name (but not any other personal information) and any other information you voluntarily provide to be seen.

We do not provide any of your personal information to third parties for marketing purposes.

### **Our Affiliates**

- **Business Partners and Affiliates:** We may collect information about you from our business partners and affiliates. In our business relationships we mainly receive information from affiliates. An example of the type of information that we may receive from an affiliate is your contact information (phone number or email) and information you have shared about your debt situation. This information either leads to a referral to us or a direct transfer of a phone call, based on your affirmative response to an advertisement placed. about debts on a third party's website. The only information we share back to an affiliate is whether you have signed up with our services. We do not share or sell any of this information.
- **Business Partners and Affiliates have their own privacy policies, which may differ materially from ours.**
- The affiliate may record the call to assure compliance with laws regarding telephonic marketing.

### **Our Professionals (including Legal Plan Attorneys and others)**

- We may collect information about you from the independent attorneys with whom you may schedule a consultation and document review through our DebtCleanse Group Services Legal Plan. An example of the type of information that we may receive from these professionals includes the fact that a consultation has occurred. While we cannot control what information legal plan attorneys share with us, DebtCleanse does not intend to collect any information from attorneys that would breach the attorney-client privilege. In other words, we do not seek nor collect information regarding the legal advice you receive from your attorney.
- Independent attorneys in our network may share your information with other professionals in situations in which they are seeking to better assist you with individual debt issues and, acting in their own discretion and using their legal expertise, may feel a different professional is better suited to assist in your particular situation.

### **Business Transfers**

- If our company undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including information related to consumers in connection with the transaction or in contemplation of the transaction (such as conducting due diligence). If such an event occurs, your information may be treated like any other DebtCleanse asset and sold, transferred, or shared with third parties, or used in ways not contemplated or permitted under this Privacy Policy. In

this case, you will be notified via email and/or a prominent notice on our site of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your personal information.

### **Public Postings**

DebtCleanse may publicly share information about consumers, such as by displaying the information on our website or having the information published in publicly available media, in a limited number of circumstances.

- We may display personal testimonials of satisfied customers received through email surveys on our website or other marketing. If you wish to update or delete your testimonial, you can contact us at [info@debtcleanse.com](mailto:info@debtcleanse.com).
- When consumers leave us reviews either on the DebtCleanse website, or on other publicly available websites, we may display these customer reviews on the DebtCleanse website. If you provide a review that we display and wish to update or delete it, you can also contact us at [info@debtcleanse.com](mailto:info@debtcleanse.com). We will delete your review at your request or if, at our discretion, we choose not to update your review as requested.

### **Required by Law**

- DebtCleanse may disclose consumer information as required by law, such as in response to a subpoena, a lawful request by a public authority, including to meet national security or law enforcement requirements, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a legal request.

### **Notifications and Communications from Us**

We will send you email notifications from time to time. For example, we may send you emails:

- To confirm your registration.
- To provide you with legal notices.
- To notify you of changes or updates to your membership.
- When the online profile you created is changed.
- To ask you to participate in surveys, or otherwise provide feedback.
- To confirm your membership in a program.
- To ask you for information.

You may also receive emails from third party providers.

### **Modifying and Deleting Your Personal Information**

You may review, modify or delete your personal information at any time. To do so, please log in and update your profile. <https://app.debtcleanse.com/login> We may retain certain information as required by law or for necessary business purposes, i.e., to have archived in the event a member who cancels choose to reactive her or his membership. The company does not use, share or sell inactive data.

## **Opting out of Email, Marketing Calls and SMS/TEXT MESSAGES**

Consumers who receive any communication from have affirmatively given their consent and indicated their interest in hearing about our services. In the event they are no longer interested they may opt out at any time by following these procedures:

URL for updating profile information:  
<https://app.debtcleanse.com/login>

Opt-out email address:  
[support@debtcleanse.com](mailto:support@debtcleanse.com)

Opt out URL:

[https://connect.debtcleanse.com/hs/manage-preferences/unsubscribe-all-test?d=VmYj8L8FZhbYVKgD3Q3\\_YlyBW2m3bL73\\_YlyBN1JxwY5GKd\\_PV20N5N68jX2tW6Vx0sn2CFVHdN1TWY1d1cn0b1&v=3](https://connect.debtcleanse.com/hs/manage-preferences/unsubscribe-all-test?d=VmYj8L8FZhbYVKgD3Q3_YlyBW2m3bL73_YlyBN1JxwY5GKd_PV20N5N68jX2tW6Vx0sn2CFVHdN1TWY1d1cn0b1&v=3)

Opt Out phone:  
800-500-0908

SMS / TEXT MESSAGES:  
Text back "STOP"

## **How We Protect Your Information**

We have put in place systems designed to protect your personal information, including:

- We employ a secure channel, using Secure Sockets Layer encryption, the standard for secure Internet network connections, to protect information exchanged over the Internet between your web browser and our servers.
- Our employees and agents are required to abide by Confidentiality requirements to protect your information.
- We use automated tools to monitor network traffic to identify unauthorized attempts to upload information, change information, or otherwise seek to gain unauthorized entry into our systems.
- We take additional steps to protect especially sensitive information.

Nevertheless, no security system is perfect. We cannot guarantee that your personal information will remain private.

## **How DebtCleanse Uses Cookies and Similar Technologies; Do Not Track Requests**

A cookie is a small amount of data sent to your browser from our computer. We use cookies to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. You may set your browser so that it does not accept cookies, although this would affect the usability of the Site.

We or our service providers (such as Google Analytics or Facebook pixels) may collect data related to your use of the Service, including which of our pages you access, the frequency of such access, and your

product and service preferences. This data collection may be accomplished by using cookies, web beacons, page tags, or similar electronic tools. Such web surfing data may include your Internet Protocol (IP) address, browser type, internet service provider (ISP), referring or exit pages, click stream data, operating system and the dates and times that you visit the Site. Web surfing data and similar information may be used for administrative purposes, to assess the usage, value, and performance of our online products and services, to offer previous visitors to our site more information about our services and to improve your experience with the Service. In general, as with cookies, the web surfing information collected is aggregated, anonymous “click stream” and transactional data, and is not associated with any users as individuals. However, Facebook pixels are associated with individual users to enable us to re-engage with people who have already expressed interest in DebtCleanse by visiting our website. If you would prefer not to see advertising based on your personal preferences, i.e., “do not track,” you can change your personal settings in your internet browser’s “help” directory (e.g., Google “Ad Settings”) or visit the website of the Network Advertising Initiative located at:

<http://www.networkadvertising.org/choices/#completed>

### **Third Party Links**

**Third-Party Websites.** DebtCleanse may maintain links to other websites and other websites may maintain links to DebtCleanse websites. This Privacy Policy applies only to DebtCleanse.com and not to other websites accessible from DebtCleanse or that you use to access DebtCleanse, each of which may have privacy policies materially different from this Privacy Policy. If you visit other websites, DebtCleanse is not responsible for the privacy practices or content of those sites.

### **Notice of Privacy Rights to California Residents**

California law requires that we provide you with a summary of your privacy rights under the [California Online Privacy Protection Act](#) (the “California Act”) and the [California Business and Professions Code](#). The California Act requires us to inform you, at your request, (1) the categories of personal information we collect and what third parties we share that information with; (2) the names and addresses of those third parties; and (3) examples of the products marketed by those companies. The California Act further requires us to allow you to control who you do not want us to share that information with. To obtain this information, please send a request by email or standard mail. When contacting us, please indicate your name, address, email address, and what personal information you do not want us to share with marketing partners. The request should be sent to the attention of our legal department at email address [Legal@debtcleanse.com](mailto:Legal@debtcleanse.com) with Subject Line: “California Customer Choice Notice.” Please allow 30 days for a response. There is no charge.

### **Complaints and Suggestions**

Please send your privacy-related complaints and suggestions to: [info@debtcleanse.com](mailto:info@debtcleanse.com) or (800) 555-1055. You can also send complaints to regulators. Please contact your state's consumer protection authority.

**Privacy Policy Revision History**

**Last updated on March 17, 2020 with an effective date of March 17, 2020.**

March 2020 Updated to include affiliates and professionals, and the use of Facebook pixels. General update, including expansion and further description of various previously posted subject areas.