

### **Privacy Policy FDCPA Disclosure:**

*Nothing in this privacy policy shall permit the disclosure of information to third parties in violation of the Fair Debt Collection Practices Act.*

We value your privacy at NCB Management Services Incorporated (hereinafter “We”) and maintain standards to secure your private information. This privacy notice discloses the privacy practices for this website. This privacy notice applies solely to information collected by this web site. It will notify you of the following:

- What personally identifiable information is collected from you through the web site, how it is used and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information.
- Your use of this website and any personal information you provide via the website remains subject to this Privacy Policy. We follow all applicable federal and state law regarding information sharing and will not violate any consumer protection laws including the Fair Debt Collection Practices Act.

BY VISITING THIS WEBSITE, YOU AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT PROVIDE ANY INFORMATION OR USE ANY OF THE SERVICES PROVIDED ON ANY OF THE WEBSITES REFERRED TO IN THIS PRIVACY POLICY. PLEASE NOTE: THIS PRIVACY POLICY CHANGES FROM TIME TO TIME AND CHANGES ARE EFFECTIVE UPON POSTING. PLEASE CHECK BACK FREQUENTLY FOR UPDATES AS IT IS YOUR SOLE RESPONSIBILITY TO BE AWARE OF CHANGES. WE DO NOT PROVIDE NOTICES OF CHANGES IN ANY MANNER OTHER THAN BY POSTING THE CHANGES AT NCB MANAGEMENT SERVICES INCORPORATED.

### **Information Collection, Use, and Sharing**

We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone. We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request.

Unless you ask us not to, we may contact you via email in the future to communicate regarding your account(s) with our office or changes to this privacy policy.

The following paragraphs in this Section describes how we currently use Personal Information, but we may change or broaden our use at any time. As noted in this Privacy Policy, we may update this policy from time to time. We use your Personal Information for the following general purposes:

- **Customer Service:** We use your Personal Information to improve our services to customers.
- **Complying with Legal Process:** We will use or disclose your Personal Information in response to subpoenas, court orders, warrants, or legal process, or to otherwise establish or exercise our legal rights or defend against legal claims or in the event you violate or breach an agreement with us.
- **Contacting You:** By using our website, you consent to contact from us or a third party affiliate with whom we share information in accordance with this Privacy Policy, to contact you by phone or email regarding your account status and changes to subscriber agreements, privacy policy, or any other policies or agreements relevant to you. We store Personal Information in a database on computers or servers owned or accessed by us. These computers and servers have security measures (such as a firewall) in place to protect against the loss, misuse, and alteration of the information under our control. Data transmitted through our website, including Personal Information you submit, is protected using 1024-bit encrypted Secure Socket Layer (SSL) technology to make your connection to our server completely confidential. SSL technology ensures that only you, our company and our third party affiliates as permitted under this Privacy Policy can access the information you submit. The data you provide is immediately translated into code, and can only be decoded by us. SSL confirms the identity of the originating computer terminal and the recipient terminal, preventing unauthorized interception. Notwithstanding such measures, we cannot guarantee that its security measures will prevent its computers from being illegally accessed, and your Personal Information from being stolen or altered. If you feel that we are not abiding by this privacy policy, you should contact us immediately via telephone at 1-800-828-1110.
- **Cookies, Web Beacons, and Other Info Collected Using Technology:** We currently uses cookie and web beacon technology to associate certain internet related information about you with information about you in our database. Additionally, we may use other new and evolving sources of information in the future.

## **Cookies**

“Cookies” are a feature on your browser software. If enabled, we may write cookies that may store small amounts of data on your computer about your visit to any of the pages of this website. Cookies assist us in tracking which of our features appeal the most to you and what content you

may have viewed on past visits. When you visit this site again, cookies can enable us to customize our content according to your preferences. We may use cookies to: keep track of the number of return visits to this site; accumulate and report aggregate, statistical information on website usage; deliver specific content to you based on your interests or past viewing history; save your password for ease of access to our website. You can disable cookies, although our website may not function properly for you. Your browser preferences can be modified to accept or reject all cookies, or request a notification when a cookie is set.

## **IP Addresses**

We automatically track certain information based upon your behavior on the site. We may use this information to do internal research on our users' demographics to better understand, protect and serve you. This information may include the URL that you just came from (whether this URL is on the site or not), which URL you next go to (whether this URL is on the site or not), your computer browser information, and your IP address. Your Internet Protocol ("IP") is a unique Internet "address" which is assigned to you by your Internet Service Provider ("ISP"). For local area network ("LAN"), DSL, or cable modem users, an IP address may be permanently assigned to a particular computer. IP addresses are automatically logged by web servers, collecting information about a user's traffic patterns. While the IP address does not identify an individual by name, it may, with the cooperation of the ISP, be used to locate and identify an individual using the web. Your IP address can, however, reveal what geographic area you are connecting from, or which ISP you are using. Finally, other websites you visit have IP addresses, and we may collect the IP addresses of those websites and their pages.

## **Do Not Track Requests**

We do not track visitors over time and across third party websites to provide targeted advertising and therefore do not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser allows you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked. Third parties cannot collect any other personally identifiable information from our websites unless you provide it to them directly.

## **No Information Collected from Children**

We will never knowingly collect any Personal Information about children under the age of 13. If we obtain actual knowledge that we have collected Personal Information about a child under the age of 13, that information will be immediately deleted from our database. Because we do not collect such information, we have no such information to use or to disclose to third parties. We have designed this policy in order to comply with the Children's Online Privacy Protection Act ("COPPA").

## **Affiliations/Merger/Sale**

If we change ownership through an acquisition, merger, sale or other change of business status, we reserve the right to transfer or assign the right to use your Personal Information collected from our websites.

## **Making Corrections**

We are committed to accurately maintaining your personally identifiable information. We will take reasonable steps to correct personal information that is properly identified as incorrect. If you need to update or correct your personal information, contact via telephone at 1-800-828-1110, via e-mail at [info@ncbi.com](mailto:info@ncbi.com) or via US Mail at 1 Allied Drive, Feasterville-Trevose, PA 19053. Please understand that, in some circumstances, only your service provider may have the authority to update or correct your personal information. If this information is the type that only your service provider can update or correct, we'll forward your request to your service provider.

# **PRIVACY POLICY**

## **Introduction**

NCB Management Services, Inc. respects your privacy and is committed to protecting it through our compliance with this website privacy policy ("Policy"). Maintaining protection of the information entrusted to our care is of the utmost importance to NCB Management Services, Inc.

This Policy describes the types of information we may collect from you or that you may provide when you visit our website and our practices for collecting, using, protecting, and disclosing that information.

This Policy applies to information we collect or you submit to us through the NCB Management Services, Inc. website. This Policy does not apply to information collected by or through websites, applications, or content operated by any third party.

This Policy outlines our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you should not use our website. By accessing or using our website, you agree to this Policy. This Policy may change from time to time (see Changes to Our Privacy Policy section below). Your continued use of our website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

## **Information We Collect About You And How We Collect It**

We collect several types of information from and about users of our website, including information:

- by which you may be personally identified, including your name, e-mail address, or telephone number (“personal information”);
- that is about you but individually does not identify you; and/or
- about your internet connection, the equipment you use to access our website, and website usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the website. Information collected automatically may include, for example, usage details and IP addresses.
- From third parties we contract with to provide services on our behalf.

### **Important Privacy Information for Consumers**

You have the right to control whether we share some of your personal information. Please read the following information carefully.

We will collect the IP Address for internal security and other proprietary purposes. We will do so even if you have included a Do Not Track request. We do not release this data outside of our corporate environment nor utilize this data other than for internal purposes.

### **Important Information Regarding the Fair Debt Collection Practices Act**

We do not disclose information to any party in violation of the Fair Debt Collection Practices Act.

### **Requesting Access or Changes to Your Information**

You can make changes to personally identifiable information we collect from you by one of the following methods:

- Calling us at 1-800-828-1110
- Emailing us at [info@ncbi.com](mailto:info@ncbi.com)

### **Information You Provide To Us**

We collect information you provide to us on or through our website including:

- Information that you provide by filling in forms on our website.
- Records and copies of your correspondence (including e-mail addresses) if you contact us.

### **Usage Details, IP Addresses, Cookies, And Other Technologies**

As you navigate through and interact with our website, we may automatically collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our website, including traffic data, location data, logs and other communication data and the resources that you access and use on our website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

The information we collect automatically is statistical data and does not identify any individual.

There may be features that are developed in the future that may result in the collection of additional new information.

We do not allow third parties to collect personally identifiable information about a user's online activities, over time and across different sites, services, and applications, when that user uses our site or service.

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

We use information that we collect about you or that you provide to us, including any personal information:

- To present our website and its contents to you.
- To provide you with information or services that you request from us.
- To offer and fulfill our core business purposes.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us or an owner or previous owner of an applicable account, including for billing and collection.
- To notify you about changes to our website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

### **Disclosure Of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect as described in this Policy:

- To contractors, service providers, and other third parties we use to support our business, such as clients, insurers, information source vendors, and payment

processors, who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- Pursuant to a merger, acquisition, or sale of all or a portion of NCB Management Services, Inc. assets.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of NCB Management Services, Inc. or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. NCB Management Services, Inc. has implemented physical, electronic, and procedural security safeguards to protect against the unauthorized or unlawful release of or access to personal information, including any social security numbers. To further safeguard this information, access to sensitive information such as social security numbers is limited, and our employees must abide by standards of conduct and confidentiality agreements.

### **Changes To Our Privacy Policy**

NCB Management Services, Inc. may change, add, modify or remove portions of this Policy at any time, which shall become effective immediately upon posting on this page. The date the Policy was last revised is identified at the bottom of the page. It is your responsibility to review this Policy for any changes. By continuing to use our website, you agree to any changes in the Policy.

### **Contact Information**

If you have any questions about our privacy protection practices or believe we have not adhered to this Policy, please contact us on our main phone number at 1-800-828-1110.

### **Changes of Ownership or Control of NCB Management Services, Inc.**

We may transfer, combine, merge, or sell all or part of our business to another entity or entities. If such an event occurs, personal information NCB Management Services, Inc. has collected or maintained may be transferred to a new controlling party or parties, who will be permitted to use your personal information under the terms of this Policy for the purposes for which you supplied it.

## **CALIFORNIA RESIDENTS: PRIVACY POLICY NOTICE**

This Privacy Policy Notice is intended for California residents pursuant to the California Consumer Privacy Act of 2018 and California Privacy Rights Act of 2020 (collectively “CCPA”), and supplements the information contained in the above Privacy Policy. Any terms defined in the CCPA and applicable California regulations have the same meaning as used in this Privacy Policy Notice. If you have a disability and want this Privacy Policy Notice provided in an alternative format, please call us at 1-800-828-1110 or write us at NCB Management Services, Inc. One Allied Drive Trevose, PA19053. If you have questions about our Privacy Policy or practices, please call 1-800-828-1110.

### **1. Information We Collect About You**

We may collect and use personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be directly or indirectly linked, with a consumer, device, or household (“personal information”).

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as (but not limited to) information governed by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the California Confidentiality of Medical Information Act (“CMIA”), the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), California Financial Information Privacy Act (“FIPA”), and the Driver’s Privacy Protection Act of 1994 (“DPPA”).

We regularly collect (and have collected in the past 12 months) several types of personal information about individuals regarding accounts we service or purchase, including:

<b>Category</b>	<b>Examples</b>
Identifiers	Name, postal address, Internet Protocol address, email address, account number, Social Security number, or other similar identifiers
Categories listed in the California Customer Records statute, Cal. Civ. Code § 1798.80(e)	Name, signature, Social Security number, address, telephone number, education, employment, bank account number, credit card number, debit card number, or other financial information, medical information, or insurance information
Protected classifications under California or federal law	Age, gender, medical condition, disability, veteran or military status
Commercial information	Records of products or services purchased, obtained
Internet or other similar network activity	Information on a consumer’s interaction with our website(s) or application(s)

Audio, electronic, visual or similar data	Call recordings
Professional or employment-related information	Current or past job history
Non-public education information (per Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))	Student financial information
Inferences drawn from personal information	To create a profile reflecting the consumer's preferences, characteristics, aptitudes, or behavior
Sensitive personal information	A consumer's social security number, driver's license, state identification card, or passport number; a consumer's account log-in in combination with any required security or access code, password, or credentials allowing access to the account

## 2. How Your Personal Information is Collected

We collect most of this personal information from our creditor clients or from you or your authorized representative by telephone or written communications. However, we may also collect information:

- From publicly accessible sources (e.g., property or other government records);
- From our service providers (e.g., call analytics, information source, skip-tracing, collections, payment processing, mailing, and other vendors)

## 3. Why We Use or Disclose Your Personal Information

We regularly use or disclose personal information for one or more of the following business purposes:

- Fulfill 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.
- Perform services on behalf of a business or service provider, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing analytic services, or providing similar services on behalf of the business or service provider
- Provide you with information or services that you request from us
- Auditing related to consumer interactions
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use, where the personal information 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

- Undertaking activities to verify or maintain the quality of a service or device that is owned, made by or for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, made by or for, or controlled by us
- Respond to law enforcement requests and as required by applicable law or court order
- As 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 purposes without providing you notice.

We regularly disclose (and have disclosed in the past 12 months) the above listed categories of personal information for business purposes to one or more of the following categories of third parties: our creditor clients, our service providers (payment processing, mailing, collection, call analytics and other vendors), credit reporting agencies, regulatory and law enforcement agencies.

We do not sell or share your personal information under the CCPA.

We do not use or disclose sensitive personal information for purposes other than those necessary to perform services reasonably expected by an average consumer; to help ensure security and integrity where use of the information is reasonably necessary and proportionate for this purpose; for short-term, transient use; for performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying customer information, processing payments, or providing similar services; for undertaking activities to verify or maintain the quality of our services, and to improve, upgrade, or enhance our services.

We retain each category of personal information or sensitive personal information no longer than is reasonably necessary for the purposes for which it was collected as stated in this privacy policy, unless extending the retention period is otherwise required or permitted by law. Subject to this limitation, the retention period of each category of personal information or sensitive personal information is determined by considering the following: the time required to retain the information to fulfill our business purposes; the time applicable to maintaining corresponding transaction and business records; the time necessary to respond to consumer queries, complaints or lawsuits; data retention requirements of applicable laws or contracts; and applicable data retention policies as may be in place from time to time.

#### **4. Verifiable Consumer Requests for Information**

Upon verification of identity, California residents may in some cases request that a business:

- Disclose the categories of personal information the business collected about the consumer;
- Disclose the categories of sources from which the personal information is collected
- Disclose the categories of personal information that the business sold about the consumer;

- Disclose the categories of personal information that the business disclosed about the consumer for a business purpose;
- Disclose the categories of third parties with whom the business shares personal information
- Disclose specific pieces of personal information the business has collected about the consumer
- Disclose any financial incentives offered by the business for collection, sale, or deletion of personal information

You have a right not to receive discriminatory treatment by a business for your exercise of CCPA privacy rights. A business may charge a different price or rate, or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to you by your personal information.

For applicable personal information access and portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Please note that we are not required to:

- Carry out information access requests we receive from you if acting as a service provider or contractor to another entity regarding such information
- Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
- Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information;
- Provide the requested information disclosure to you more than twice in a 12-month period.
- Provide the requested information 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; or
- Provide the requested information disclosure if a CPRA or applicable exception applies.

## **5. Right to Request Deletion of Personal Information**

Upon verification of identity, California residents may in some cases request that a business delete personal information about you that the business collected from you and retained, subject to certain exceptions.

We may deny your deletion request if we are acting in the role of a service provider to another business regarding the applicable personal information. If we deny your request on that basis, we will generally refer you to the relevant business. In addition, we may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information; or
- If another CCPA or applicable exception applies.

#### **6. Right to Request Correction of Inaccurate Personal Information**

Upon verification of identity, California residents may in some cases request a business that maintains inaccurate personal information about you correct that inaccurate personal information. We will use commercially reasonable efforts to correct the inaccurate personal information.

California residents may make verifiable requests to disclose, delete, or correct pursuant to the CPRA or obtain more information by contacting us at:

- Email: [info@ncbi.com](mailto:info@ncbi.com)
- Telephone: 1-800-828-1110
- Address: NCB Management Services, Inc. One Allied Drive Trevose, PA19053

#### **Verifying Your Identity If You Submit CPRA Requests**

If you choose to contact us directly via the designated methods described above to exercise your CPRA rights, you will need to:

- Provide enough information to reasonably identify you (e.g., your full name, account number if applicable, and potentially other identifying information); and
- Describe your request with sufficient detail to allow us to properly process and respond to your request.

If seeking to make a verifiable request under the CPRA on behalf of someone else, we require enough information to reasonably identify the subject of the request (including name and other identifying information) and the subject's written consent to make the CPRA request on his or her behalf, as consistent with applicable law.

We are not obligated to make an information disclosure or carry out a deletion request pursuant to the CPRA 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 in order to verify your identity in connection with your CPRA request will be used solely for the purposes of verification.

**Last modified:** 11/01/2024

**COLORADO, CONNECTICUT, DELAWARE, IOWA, MONTANA, NEBRASKA, NEW HAMPSHIRE, NEW JERSEY, OREGON, TEXAS, UTAH AND VIRGINIA RESIDENTS:**

**NCB Management Services, Inc. Privacy Policy Notice**

This Privacy Policy Notice is intended for Colorado, Connecticut, Delaware, Iowa, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah and Virginia residents pursuant to the Colorado Privacy Act, the Connecticut Data Privacy Act, the Delaware Personal Data Privacy Act, the Iowa Consumer Data Protection Act, the Montana Consumer Data Privacy Act, the Nebraska Data Privacy Act, the New Hampshire Consumer Data Privacy Act, the New Jersey Data Privacy Act, the Oregon Consumer Privacy Act, the Texas Data Privacy and Security Act, the Utah Consumer Privacy Act and the Virginia Consumer Data Protection Act, respectively. This policy supplements the information contained in the above Privacy Policy. Any terms defined in these laws and related regulations have the same meaning as used in this Privacy Policy Notice.

**1. Personal Data We Collect About You**

We may process personal data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be directly or indirectly linked, with a consumer, device, or household ("personal data").

Personal data does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the scope of the above privacy laws, such as (but not limited to) information governed by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), the Fair Credit Reporting Act ("FCRA"), and the Gramm-Leach-Bliley Act ("GLBA").

We regularly process (and have processed in the past 12 months) several types of personal data about individuals regarding accounts we service or purchase, including:

Category	Examples
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Identifiers	Name, signature, postal address, Internet Protocol address, email address, telephone number, account number, Social Security number, or other similar identifiers
Financial information	Bank account number, credit card number, debit card number, or other financial information; medical insurance information
Protected classifications	Age, gender, medical condition, disability, veteran or military status
Commercial information	Records of products or services purchased, obtained
Internet or other similar network activity	Information on a consumer's interaction with our website(s) or application(s)
Audio, electronic, visual or similar data	Call recordings
Professional, or employment-related information	Current or past job history
Non-public education information	Student financial information
Inferences drawn from personal information	To create a profile reflecting the consumer's preferences, characteristics, aptitudes, or behavior
Personal information	A consumer's social security number, driver's license, state identification card, or passport number; a consumer's account log-in in combination with any required security or access code, password, or credentials allowing access to the account

## 2. Why We Process Your Personal Data

We regularly process personal data for one or more of the following business purposes:

- Fulfill the reason you provided the information. For example, if you share your personal data to make a payment, we will use that information to process your payment.
- Perform services on behalf of a business or service provider, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing analytic services, or providing similar services on behalf of the business or service provider.
- Provide you with information or services that you request from us
- Auditing related to consumer interactions.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, where the personal information 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.
- Undertaking activities to verify or maintain the quality of a service or device that is owned, made by or for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, made by or for, or controlled by us.
- Respond to law enforcement requests and as required by applicable law or court order.

- As 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 permitted by law.

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

### 3. **Third Parties To Whom We Disclose Personal Data**

We regularly disclose (and have disclosed in the past 12 months) the above listed categories of personal data for business purposes to one or more of the following categories of third parties: our creditor clients, our service providers (payment processing, mailing, collection, call analytics and other vendors), credit reporting agencies, regulatory and law enforcement agencies.

### 4. **We Do Not Sell Personal Data Or Engage In Targeted Advertising Or Profiling**

We do not sell your personal data, process your personal data for targeted advertising, or process your personal data for automated decision-making including profiling in furtherance of decisions that produce legal or similarly significant effect on you.

### 5. **How To Request To Exercise Your Rights**

Upon our verification of identity through commercially reasonable means, Colorado, Connecticut, Utah and Virginia residents may request to exercise one or more of the following rights:

- To **confirm** whether or not we are processing your personal data and to **access** such personal data;
- To **delete** personal data provided by or obtained about you;
- To **obtain a copy** of your personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another company without hindrance, where the processing is carried out by automated means.

Additionally, upon our verification of identity through commercially reasonable means, Colorado, Connecticut, Delaware, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas and Virginia residents may request to exercise the right to **correct** inaccuracies in your personal data, taking into account the nature of the personal data and the purposes for processing the data.

You may request to exercise these rights by one of the following methods:

- Via our website: [www.ncbi.com](http://www.ncbi.com)
- Calling us at: 1-800-828-1110
- Emailing us at: [info@ncbi.com](mailto:info@ncbi.com)
- Mailing us at: NCB Management Services, Inc. One Allied Drive Trevose, PA19053

Colorado, Connecticut, Delaware, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Virginia residents may appeal our decision concerning your request by contacting us using any of the above methods, within 45 days of your receipt of our decision on your request, to advise of your appeal.

**Last modified:** 01/01/2025