

Consumer State Privacy Notices

(To obtain a copy of this notice in an alternative format please phone Scott & Associates (“we”, “our”, and “us”) at (866)-298-3155 or email us at info@scott-pc.com). You can also download PDF files of this notice [here](#).)

This additional notice is for residents of California, Texas and Virginia and (“Notice”) supplements our Scott & Associates Privacy Policy. This Notice applies solely to residents of those states whose data we process. It also describes how you exercise the rights under the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act of 2020 (the “CPRA”), and its implementing regulations (the “CCPA/CPRA”), the Texas Data Privacy and Security Act, Texas Title 11, Business & Commerce Code Section 541 et seq., (“TDPSA”), and the Virginia Consumer Data Protection Act (collectively, the U.S. State Privacy Laws”).

A. California

This Notice applies to California consumers, including personnel working on behalf of our business partners (e.g., vendors), subject to the exceptions listed below. This Notice applies to personal information we collect about California consumers, both on our website and offline.

This Notice does not apply to:

- Scott & Associates personnel or job applicants (see **Privacy Policy For Employees And Applicants** section below);
- Information we collect, process or disclose in connection with the provision of financial services per the U.S. Gramm-Leach-Bliley Act and its implementing regulations (“GLBA”). If you have a financial service with us, we will use and share the personal information that we collect from or about you in accordance with our Privacy Policy.

This Notice uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act of 2020 (the “CPRA”), and its implementing regulations (the “CCPA/CPRA”).

Notice of Collection and Source of Personal Information

We only knowingly collect information covered by GLBA, and therefore, exempt from the CCPA.

During the 12-month period before the effective date of this Notice, we typically collect the following categories of information from you (and others as noted):

- Personal identifying information, including, but not limited to name, address, telephone number, social security number, account number, email address, driver’s license number, as well as other identifying information, which we obtain from a person’s creditor, and/or credit reports and/or third-party data providers and/or the consumer;

- Characteristics such as age, gender, etc., which we obtain from credit reports and/or a person's creditor and/or the consumer;
- Retail information, which we obtain from credit reports and/or a person's creditor;
- Internet activity such as IP address from cookies, after visiting our websites or payment portal;
- Banking information, which we obtain from a person's creditor and/or credit reports and/or third-party data providers and/or the consumer;
- Geolocation data and location data, including GPS coordinates, which we obtain from process servers if there is a lawsuit filed;
- Call recordings, which are made when the consumer has a telephone conversation with us;
- Professional and employment-related information, which we obtain from the consumer's creditor, credit reports, third-party data providers, consumer's employer, and/or the consumer;
- Educational information, which we obtain from the consumer's creditor, credit reports, and/or possibly any applications or other documents gathered from a person's creditor; and
- Biometric information including, but not limited to physical descriptions, photos and voiceprints (audio recordings), which we obtained from person's creditor and/or process servers if there is a lawsuit, and recordings which are made when the consumer has a telephone conversation with us.

Use of Personal Information

We may use (and may have used during the 12-month period prior to the effective date of this Notice) your personal information for the purposes described in our Privacy Policy and for the following Business Purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, processing or fulfilling information or services requested by you, verifying customer information, processing payments, providing analytics services, providing storage, or providing similar services;
- Auditing compliance;
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration; and
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

Other business or business operational purposes as follows:

- Debt collection.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for collections.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and our clients, including for collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and service development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, governmental regulations, or comply with a court order or subpoena to provide information.
- To comply with any attorney ethical obligations
- As described to you when collecting your Personal Information

We do not collect or process sensitive personal information with the purpose of inferring characteristics about California consumers covered by this Notice.

Retention of Personal Information

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in our Privacy Policy and this Notice, and/or otherwise required by law or attorney ethical obligations to be retained.

Sale or Sharing of Personal Information

We do not and will not sell your personal information or share your personal information for cross-context behavioral advertising purposes.

Disclosure of Personal Information

During the 12-month period prior to the effective date of this Notice, we may have disclosed the following categories of personal information about you for a Business Purpose to the following categories of third parties:

Category of Personal Information	Category of Third Party
Certain Identifiers per Cal. Civ. Code § 1798.140 (v)(1)(A) (name, postal address, account name)	<ul style="list-style-type: none"> • Vendors who provide services on our behalf • Professional services organizations, such as independent auditors • Data analytics providers

<p>Characteristics of protected classifications under California or federal law per Cal. Civ. Code § 1798.140 (v)(1)(C)</p>	<ul style="list-style-type: none"> • Vendors who provide services on our behalf • Professional services organizations, such as independent auditors • Data analytics providers
<p>Online Activity per Cal. Civ. Code § 1798.140 (v)(1)(F)</p>	<ul style="list-style-type: none"> • Vendors who provide services on our behalf • Professional services organizations, such as independent auditors • Data analytics providers
<p>Sensory Information per Cal. Civ. Code § 1798.140 (v)(1)(H)</p>	<ul style="list-style-type: none"> • Vendors who provide services on our behalf • Professional services organizations, such as independent auditors • Data analytics providers

We also disclose personal information for Business Purposes to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Trusted service providers and contractors are used to perform functions and provide services for us for a Business Purpose. We may disclose your personal information with them, but only to the extent necessary to perform these functions and provide such services, such as perfecting service of process, processing payments, and data analytics.

We do not use or disclose Sensitive Personal Information for purposes other than those as specified Cal. Civ. Code § 1798.121(a).

California Consumer Privacy Rights

A consumer has the right to request that we disclose the following upon receipt of a verified request:

Right to Know: You have the right to request, twice in a 12-month period, that we disclose to you:

- The categories of personal information we collect;
- The categories of sources from which the personal information is collected;
- The purpose for collecting the personal information;
- The categories of third parties with whom the business shares personal information; and
- The specific pieces of personal information we have collected, disclosed, or sold.

during the past 12 months.

Right to Correction: You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.

Right to Deletion: You have the right to request that we delete certain personal information we have collected from you, subject to various exceptions. The information that Scott & Associates collects generally falls within an exception and does not have to be deleted upon request. Nonetheless, such a request can be made to Scott & Associates at (866)-298-3155 or fill out this form and email us at info@scott-pc.com).

Right to Opt-Out of Sale or Sharing: You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes. As described above, we do not sell personal information or share personal information for cross-context behavioral advertising purposes.

How to Submit a Request. If you wish to request the categories of information or the actual information we have collected about you, please call us at (866)-298-3155 or fill out this form and email us at info@scott-pc.com). Scott & Associates is a debt collector and all information that is collected will be used for debt collection purposes.

Verification. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. Once we receive your request, we will compare the information you provided with the information Scott & Associates already has. If we can verify that the request came from you, we will provide the required information. We will match 2-3 identifying, personal information data points to verify that the request came from the consumer. If we cannot verify that the request came from the consumer, we will notify the consumer.

Right to Non-Discrimination. You have a right not to receive discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA/CPRA.

The California Privacy Act provides that a consumer can designate an authorized agent to make a request under the California Consumer Privacy Act. The consumer must provide either a power of attorney or written authorization to authorize an agent to make a request.

This privacy policy was last updated on July 1, 2024.

Privacy Policy For Employees And Applicants

The California Consumer Privacy Act requires that we disclose the categories of personal information we typically collect and use in the context of a person's role as a job applicant or employee. We typically collect the following categories of information from you and others as noted:

1. Identifiers such as personal identifying information, including, but not limited to name, address, telephone number, social security number, email address, work authorization documents, bank account information, as well as other identifying information from you, your creditor, credit reports and/or third-party data providers;
2. Personal information as defined in the California Customer Records Act, Cal. Civ. Code Section 1798.80 such as contact information, health information, insurance information, financial information, results of drug testing and criminal background information.
3. Protected classifications under California or federal law such as age, race, color, citizenship, marital status, gender, etc. from you and providers of background checks;
4. Internet or similar activity information such as IP address from your browsing history, search history, information on an interaction with websites and applications;
5. Geolocation data such as device location if you work remotely;
6. Audio, electronic, visual or similar information such as call and video recordings;
7. Biometric information such as photos or other physical patterns;
8. Professional and employment related information from you and/or third-party data providers;
9. Educational information from you and/or third-party data providers;
10. Information such as work history and performance evaluations; and
11. Certain inferences concerning an individual's preferences, abilities, aptitudes and characteristics

We collect personal information relating to employees and applicants who are California residents in a variety of contexts, including in connection with applications for employment,

Human Resource activities and job-related activities. The categories of personal information that we collect and use about a California resident will depend on our specific relationship or interaction with that individual, and the examples provided in each category above are for illustrative purposes only.

Purposes for Which We Use Personal Information:

We may use personal information relating to employees and applicants who are California residents for one or more of the following business purposes:

- Evaluating employment applications and employee performance
- Providing and maintaining our employee related services
- Conducting pre-employment screenings
- Protecting against security risks
- Conducting research and data analysis
- Maintaining our facilities, systems, and infrastructure
- Improving our employee related services
- Carrying out our legal and business purposes, such as complying with federal, state, or local laws, responding to civil, criminal, or regulatory lawsuits or investigations, exercising our rights or defending against legal claims, resolving complaints and disputes, performing compliance activities, performing institutional risk control, and otherwise operating, managing, and maintaining our business
- As otherwise disclosed to you at or before the point of collecting your personal information

We may also use personal information relating to California residents for one or more of the specific “business purposes” listed in the CCPA:

- Auditing related to an employee
- 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
- Performing services on behalf of clients or their service providers, including maintaining or servicing employees’ accounts, providing employees service, processing or fulfilling orders and transactions, verifying employees or applicant’s information, processing payroll, or providing similar services on behalf of Scott & Associates or its service providers
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service that is owned or controlled by Scott & Associates.

Changes to This CCPA Disclosure

We may change or update this CCPA Disclosure in the future. When we do, we will post the revised CCPA Disclosure To Employees and Applicants on our website.

B. Texas and Virginia

The below privacy notice applies solely to visitors, users, and others who reside in the States of Texas and Virginia (“consumers” or “you”). Scott & Associates is a debt collector. This Notice applies to both our online and offline practices.

This Notice does not apply to:

- Information we collect, process or disclose in connection with the provision of financial services per the U.S. Gramm-Leach-Bliley Act and its implementing regulations (“GLBA”). If you have a financial service with us, we will use and share the personal information that we collect from or about you in accordance with our Privacy Policy.

This Notice uses certain terms that have the meaning given to them in the Texas Data Privacy and Security Act, Texas Title 11, Business & Commerce Code Section 541 et seq., (“TDPISA”) and Virginia Consumer Data Protection Act of 2021 (“VCDPA”) and other applicable Virginia privacy laws (collectively, “Virginia Privacy Laws”), respectively.

Categories of Personal Data Processed

We collect information that is linked or reasonably linkable to an identified or identifiable natural person (“personal data”). Personal data does not include de-identified data or publicly available information. In particular, we have collected the following categories of personal data from consumers:

- Personal identifying information, including, but not limited to name, address, telephone number, social security number, account number, email address, driver’s license number, as well as other identifying information, which we obtain from a consumer’s creditor, and/or credit reports, and/or third-party data providers, and/or the consumer;
- Characteristics such as age, gender, etc., which we obtain from the consumer’s creditor and/or consumer’s credit report and/or the consumer;
- Retail information, which we obtain from credit reports and/or a consumer’s creditor;
- Internet activity such as IP address from cookies after visiting our websites or payment portal;
- Banking information, which we obtain from a consumer’s creditor and/or credit reports and/or third-party data providers and/or the consumer;
- Geolocation data and location data, including GPS coordinates, which we obtain from process servers if there is a lawsuit filed;
- Call recordings, which are made when the consumer has a telephone conversation with us;

- Professional and employment-related information, which we obtain from the consumer's creditor, credit reports, third-party data providers, consumer's employer, and/or the consumer;
- Educational information, which we obtain from the consumer's creditor, credit reports, and/or possibly any applications or other documents gathered from a consumer's creditor; and
- Biometric information including, but not limited to physical descriptions, photos and voiceprints (audio recordings), which we obtained from consumer's creditor and/or process servers if there is a lawsuit, and recordings which are made when the consumer has a telephone conversation with us.

We will always limit collected information, and categories of collected information, to what is reasonably necessary to perform any internal operations.

Purposes for Processing of Personal Data

We may use or disclose the personal data we collect for the purposes described in our Privacy Policy and for one or more of the following business purposes:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, processing or fulfilling information or services requested by you, verifying customer information, processing payments, providing analytics services, providing storage, or providing similar services;
- Auditing compliance;
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration; and
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

Other business or business operational purposes as follows:

- Debt collection.
- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information for us to process a payment, we will use that information to process that payment.
- To provide you with information or services that you request from us.
- To provide you with email or text alerts and other notices concerning our services.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for collections.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and our clients, including for collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and service development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, governmental regulations, or comply with a court order or subpoena to provide information.
- To comply with any attorney ethical obligations
- As described to you when collecting your personal information or as otherwise set forth in the TDPSA and/or Virginia Privacy Laws.

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

Exercising Your Rights

To exercise your rights set forth in this Notice, please submit a verifiable consumer request to us by:

- calling us at 866-298-3155 or emailing us at info@scott-pc.com
- filling out and submitting this form

Only you may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable request must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. Once we receive your request, we will compare the information you provided with the information Scott & Associates already has. If we can verify that the request came from you, we will provide the required information. We will match 2-3 identifying, personal information data points to verify that the request came from the consumer. If we cannot verify that the request came from the consumer, we will notify the consumer.

Texas residents only: We have established an appeal process by which you may appeal any refusal of ours to take action on a request. We will inform you in writing of any action taken or not taken in response to an appeal within 60 days after the date of receipt of the appeal, including a written explanation of the reason or reasons for the decision. If we deny the appeal, we will provide or specify information that enables you to contact the Attorney General to submit a complaint.

Categories of Personal Data Disclosed

A processor processes personal data on behalf of us. A third party is an entity other than you, Scott & Associates, an affiliate of Scott & Associates or a processor. We engage certain trusted third parties to perform functions and provide services to us for a business purpose. We may share your personal information with these third parties, but only to the extent necessary to perform these functions and provide such services. We also require these third parties to maintain the privacy and security of the personal data they process on our behalf.

We have disclosed the following categories of personal data for a business purpose:

- Personal identifying information
- Characteristic information
- Retail information
- Professional or employment related information

Categories of Third Parties

We disclose personal data for business purposes to the following categories of third parties:

- Service providers.
- Professional services organizations, such as independent auditors
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Consumer Rights

Subject to certain limitations and exemptions outlined in the TDPSA and/or Virginia Privacy Laws, consumers are provided with specific rights regarding their personal data. This section describes your rights

- **Confirmation Rights:** You have the right to confirm whether or not we are processing your personal data and to access such personal data.
- **Correction Rights:** You have the right to request correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data.

- **Deletion Rights:** You have the right to request that Scott & Associates delete personal data provided by or obtained about you.
- **Data Portability Rights:** You have the right to request Scott & Associates provide you with a copy of your personal data 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 business.
- **Processing of Personal Data:** the TDPSA and/or Virginia Privacy Laws provide for the right to opt out of the processing of your personal data for (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. However, Scott & Associates does not and will not process your personal data for any of the reasons outlined in the preceding sentence.

Changes to Our Privacy Notice

This Notice was last updated on 7/1/2024. We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will notify you updating the “last updated” date on this Notice.