

California Privacy Policy (effective *January 1, 2024*)

Lea nuestras políticas sobre la Ley de Privacidad del Consumidor de California en Español

California Consumer Privacy Act

This Privacy Notice for California Residents supplements the information contained in DCM Services, LLC's ("DCM Services") privacy policy and applies solely to all-natural persons residing in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and the California Consumer Privacy Rights Act of 2020 (CPRA).

Your Rights and Choices

You have the right to access personal information which we may collect or retain about you. If requested, we will provide you with a copy of your personal information which we collect as permitted by the CCPA/CPRA. Please note, these rights are not absolute, and we may refuse requests, in whole or in part, where exceptions under applicable law apply.

A. Right to Know

You have the right to request that we disclose the following about your personal information, as defined by the CCPA/CPRA.

- The specific pieces of personal information we collected about you.
- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- The business purpose(s) for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we disclosed your personal information for a business purpose, we will identify the personal information categories that each category of recipient obtained.

B. Right to Delete

In certain circumstances, you have the right to request that the Company delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

C. Right to Correct

In certain circumstances, you have the right to request correction of inaccurate personal information. Once we receive and confirm your verifiable consumer request, we will use commercially reasonable efforts to correct your personal information as directed, unless an exception applies.

D. Do not Share or Disclose Sensitive Personal Information

DCM Services does not collect sensitive personal information within the meaning of the CCPA/CPRA.

E. Right to Opt Out/Do Not Sell my Personal Information

DCM Services does not sell personal information within the meaning of the CCPA/CPRA.

Exercising Your Rights

If you are a California resident, you can exercise any of the rights described in this notice by using the contact information provided below. We will not discriminate against you for exercising such rights. There is no charge to exercise your legal rights.

- a. Calling us at 1-800-669-3393
- b. E-mailing privacy@dcmervices.com
- c. Through your account on Service Link, if you have an account with us

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, or a person who has power of attorney or conservatorship that we may reasonably verify may make a verifiable consumer request related to your personal information.

The verifiable consumer 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.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, DCM Services has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples
Identifiers	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)).	A name, signature, address, telephone number, education, employment, employment history, credit card number, debt card number, or any other methods of payment for our services, or medical information. Some personal

Category	Examples
	information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law.	Age (40 years or older), medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.
Commercial information	Records of services we provide to our clients that involve consumers.
Internet or other similar network activity.	Information on a consumer’s interaction with our website or application such as IP address, screen size, browser version, operating system version, search engine used to locate our website or application.
Geolocation data.	Physical location.
Sensory data.	Audio if a phone conversation occurs with a consumer.
Professional or employment related information.	Current or past job history.

Sensitive Personal Information

DCM Services does not collect sensitive personal information within the meaning of the CCPA/CPRA.

How We Collect Personal Information

DCM Services obtains the categories of personal information listed above from the following categories of sources:

- Direct interactions. You may give us your information by filling in forms or by corresponding with us by mail, phone, fax, email or in-person
- From our service providers (e.g., letter vendor, skip tracing vendors, and payment processing vendor).
- From our clients whom we provide service to.
- Automated technologies or interactions. As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive technical information about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Data from providers of technical, payment and delivery;
 - Your authorized representative and/or attorney;
 - State and federal courts;
 - Federal, state and local governments;
 - Third parties contacted during skip tracing activities pursuant to 16 U.S.C. §1692b.

The Purpose for which Personal Information is Collected

We may use and/or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet 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.
- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling requests, verifying customer information, processing payments, or providing similar services on behalf of the business or service provider.
- To provide you with information or services that you request from us.
- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, auditing compliance with this specification and other standards.
- 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 provided the personal information that 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 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 the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- As necessary or 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.

DCM Services 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.

Disclosure of Personal Information

DCM Services may disclose your personal information to a service provider for a business purpose. When we disclose personal information for a business purpose, we require that the recipient both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following parties:

- Our affiliates.

- Service providers acting as payment service providers and delivery companies.
- Professional advisers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.

Additionally, we may be required to disclose personal information to the following parties:

- Regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, DCM Services has disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.

In the preceding twelve (12) months, DCM Services has not disclosed the following categories of personal information for a business purpose:

- Commercial information.
- Internet or other similar network activity.
- Geolocation data.
- Sensory data.
- Professional or employment-related information.

DCM Services does not share or sell personal information within the meaning of the CCPA/CPRA.

F. Changes to Our Privacy Notice

The Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

G. Contact Information

If you have any questions or comments about this notice, the ways in which DCM Services collects and uses your information described above and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800-669-3393

Website: www.dcmservices.com

Email: privacy@dcmservices.com

Postal Address:

DCM Services, LLC

Attn: Privacy

1550 American Blvd E, Suite 200

Bloomington, MN 55425

For Use by: DCM Services, LLC

Effective Date this Version: See date in Revision Record table

Document Owner/Approver		
Martha Hanson	General Counsel & CCO	12/27/2023
Rubin Perelman	ISO & Sr. Director of ERM	12/19/2023
Publisher		
Kathy Anderson		Document Coordinator

Revision Record		
Rev #	Effective Date	Description of Changes
1.0	Pre 1/30/2020	New Document per RT #275843
2.0	2/2/2021	Scheduled annual review per RT #313989. Reviewed and no changes needed at this time.
3.0	1/4/2022	Scheduled annual review per RT #356906. Reviewed and no changes at this time.
4.0	1/1/2023	Scheduled review per RT #399261. Made the following changes: <ul style="list-style-type: none"> • Updated address on page 5 • Changes made throughout document
5.0	1/1/2024	Scheduled review per RT #436731. Reviewed and no changes needed at this time. Document owner(s) approved as stated in the approval date. Publishing held until Effective Date.