

## Privacy Notice Policy (effective *January 1, 2024*)

### Privacy Policy

DCM Services, LLC maintains this Privacy Policy ("Policy") that summarizes our policies and processes for protecting the privacy of all personal information gathered from business customers and prospective business customers (collectively, "Customers" for the purpose of this Policy), consumers, and visitors to our websites, and when and how such information is collected, used, and safeguarded. This Policy also explains how anyone can update their personal contact information and specify what information, if any, they would like to receive from DCM Services on an on-going basis.

### Introduction

DCM Services is committed to ensuring your privacy and protecting the security of your personal information. This Policy covers the public DCM Services website - [dcm-services.com](https://dcm-services.com) site (the "Website") - and all online portals and forms on this Website used to collect personal information; it does not cover third party sites that are linked to or from the Website. This Policy does not apply to other entities that we do not own or control or persons that are not our employees, agents or within our control. By using this Website, you are agreeing to the terms of this Policy. If you do not agree with any terms or practices described in this Policy, please exit from this Website.

### Collecting Personal Information

You can access our Website without providing us with any personal information. However, DCM Services does collect personal information in various locations on our Website when you choose to access specific high-value content or services, such as DCMS ServiceLink™. It is completely optional for you to participate in these programs. If you elect to participate in these programs, we require that you limit information about yourself to the minimum amount necessary for us to effectively provide the services you request.

### Information We Collect

When you request high-value materials from our website - such as a white paper or executive brief, subscribe to our e-mail communications, access our product demonstrations, register for a DCM Services event or web seminar, register for as DCMS ServiceLink™, or request specific information from us - we ask you to fill out a form soliciting information about you and/or your company. If you are contacting us in connection with an estate matter, in your capacity as the estate representative, or as a consumer, we may ask you for contact information, such as your name, telephone number, address, and e-mail address. If you choose to pay via DCMS ServiceLink™, we will ask you to provide payment information including bank routing and account information. If you are contacting us as a Customer, we ask for contact information, such as your name, title, telephone number, address, and e-mail address; information about your company and information about any projects underway or planned.

We use a third-party service provider to collect information on the Career Page and the storage, sharing, and use of that information is governed by its privacy policy, which you can review here: [paylocity.com/who-we-are/protecting-our-clients/privacy-center/](https://paylocity.com/who-we-are/protecting-our-clients/privacy-center/)

We use a third-party service provider to process payments submitted on DCMS ServiceLink™ and storage, sharing, and use of that information is governed by its privacy policy, which you can review here: [cybersource.com/privacy](https://cybersource.com/privacy). If you elect to schedule a payment for a later date, DCM Services will store the payment information to be transmitted to the third-party service provider. You may choose to save checking and savings account information ("Funding Account") on your DCMS ServiceLink™ account for convenience when making future payments.

In addition to the information that you volunteer when you register on our Website, we may also collect anonymous clickstream data. We may use this data in aggregate to better understand the needs and interests of visitors to our Website. This information is collected on an aggregated and anonymous basis.

Our primary goal in collecting the information described above is to provide you, the user, with a customized experience on our Website. By knowing a little about each user, we are able to deliver better service and more relevant content to Customers, consumers, and visitors.

### Cookies

A "cookie" is a small amount of data that is sent to your browser from a web server and stored on your computer or device. We may use cookies to track general, non-personal information about our users (e.g., pages viewed, time spent on our Website, and the websites visited just before and just after our Website) for statistical and market research purposes. The information is collected on an aggregated and anonymous basis.

We use cookies to gather information about our Website users' browser activities in order to constantly improve our Website and better serve our customers. This information assists us to design and arrange our web pages in a most user-friendly manner and to continually improve our Website to better meet the needs of our Customers, consumers, and visitors.

You have choices with respect to cookies. By modifying your browser preferences, you have the option to reject all cookies, which may, however, in limited instances prevent you from accessing certain features on our Website.

### Use of Personal Information

We will not disclose any personal information collected from consumers, Customers, or visitors, except as described below. Otherwise, the provisions of this Policy are limited only by legal process, negotiated contract and the technical operation of the Website.

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## Use by DCM Services

### **Consumers**

We use the information you provide to communicate with you in connection with the collection of the debt(s) which you select within DCMS ServiceLink™. We also may use the information to communicate with you regarding any other debts that are placed with our office for collection for the decedent(s) whose estate(s) you are representing. We will not send you any unsolicited e-mail communications. We may have a need to send you correspondence regarding the debts selected within DCMS ServiceLink™, as well as other debts that are placed with our office for collection for the decedent(s) whose estate(s) you are representing; such correspondence will be sent via U.S. Mail.

### **Customers**

We use the information you provide so that we may in turn provide you with information or offers that we believe will be beneficial to you. We may periodically send you news or information about DCM Services and the solutions we offer, as well as information about the industry and emerging strategies that we hope will help you improve the overall effectiveness of your multimedia solutions. This could include white papers, newsletters, and invitations to events such as web seminars and user conferences, and product announcements.

## Sharing with Business Partners

### **Consumers**

We do not sell any personal information about consumers to any third parties. However, we may share aggregated consumer demographic information with our business partners in support of current or future business service offerings. This is not linked to any personal information that can identify any individual person. We may also share personal information about consumers with our service providers in support of our collection services and the creditor(s) to whom the debt(s) is owed; we will only share this information as permitted by law, such as where you have authorized sharing or in order to provide a product or service you request, to complete a transaction requested by you, or as required, such as by subpoena or court order, or as mandated by law, with law enforcement agencies. When we share such information, we will share only the minimum necessary to effectively provide the necessary service(s).

### **Customers**

We do not sell or trade any personal information about Customers, or visitors to any third parties. We may share, however, aggregated Customer demographic information with our business partners and advertisers. This is not linked to any personal information that can identify any individual person. We may also periodically engage in co-marketing activities directed at customers and potential customers, where we work with a complementary solution provider to launch a joint marketing program. In these situations, we will only send information to you on behalf of the other; we do not provide your personal information to such partner. We may also enter into business partnerships with other parties to provide specific services. If a user signs up for these services or responds to a particular marketing offer, we may share personal information

such as your name or other contact information that is necessary for our business partner to provide these services or get in contact with you.

### Storage of Personal Information and Security

We take reasonable precaution to protect the personal information we collect from Customers, consumers and visitors. When users submit personal information via the Website, the information is housed in a secure in-house database. To prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the personal information we maintain. DCM Services uses industry-standard technology, such as firewalls, in an effort to protect the confidentiality of your personal information. Moreover, only employees who need the information to perform their duties are granted access to personally identifiable information.

While we strive to protect your personal information using the aforementioned technologies, you should know that information that you send over the Internet is subject to threats outside of our control (e.g., malicious software infecting your computer or device) and therefore we cannot guarantee absolute security, whether by e-mail or by using DCMS ServiceLink™ or one of our on-line forms. Therefore, we cannot guarantee the absolute security of such information.

### Feedback and Information

At any time, you can change your communication preferences for the type of information you would like to receive from DCM Services. You may also opt-out from receiving any such information. To contact us to change your communication preferences, please e-mail us at [info@dcm services.com](mailto:info@dcm services.com).

### Reviewing and Requesting Changes to Collected Information

Personally identifiable information you provided via DCMS ServiceLink™ (as a consumer) may be reviewed and updated via your DCMS ServiceLink™ profile. You may request to review and or correct personally identifiable information provided to DCM Services through a request for high-value materials from our Website or through registration for a DCM Services event or web seminar by sending a request to [info@dcm services.com](mailto:info@dcm services.com).

### Retention and Deletion of Information

We will keep information collected until any point at which it is determined to no longer be necessary to fulfill a business need or provide a service to you, subject to our record retention policies that ensure compliance with any applicable laws. At any time, you may request that we delete information that you provided to us or delete an account that you set-up on DCMS ServiceLink™. We will honor your request to the extent we can, while remaining compliant with any applicable laws. To request deletion of your information, please e-mail us at [info@dcm services.com](mailto:info@dcm services.com).

If you provide payment information via DCMS ServiceLink™, after the information is transmitted to our third-party payment processor, only redacted information will be stored by DCM Services; redacted information is limited to the last four of any provided checking, routing, credit, or debit

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account number. If you choose to save Funding Account information on your DCMS ServiceLink™ profile, DCM Services will retain this information until such time as: (1) you delete the Funding Account from your DCMS ServiceLink™ profile, (2) you delete your DCMS ServiceLink™ profile in its entirety, or (3) DCM Services deletes your DCMS ServiceLink™ profile after an extended period of inactivity. Our third-party payment processing service provider's retention of information is governed by its privacy policy, which you can review here: [cybersource.com/privacy](https://cybersource.com/privacy).

### Legal Disclaimer

We may disclose personal information when required by law or in the good faith belief that such action is necessary in order to conform to the edicts of the law or comply with a legal process served on us.

### Notification of Changes

If we decide to change our Policy, we will post those changes on this Privacy Policy page, so you are aware of what personal information we collect from Customers, consumers, and visitors to our website, and when and how such information is collected, used, and safeguarded. If at any time we decide to use personal information in a manner different from that stated at the time it was collected, we will take commercially reasonable measures to obtain consent from you. You will have a choice as to whether or not we use your personal information in this different manner.

### No Guarantees

While this Policy states our standards for maintenance of personal information and we will make efforts to meet them, we are not in a position to guarantee these standards. There may be factors beyond our control that may result in disclosure of personal information. As a consequence, we disclaim any warranties or representations relating to maintenance or nondisclosure of any personal information collected from customers, prospective customers, or visitors.

### Links to Third Party Websites

Please be advised that this Website may contain certain hyperlinks to other websites. Although these websites may have privacy policies, all of these websites and their privacy policies are independent of our Website and this Policy. We are not responsible for compliance with other websites' privacy policies or data collection practices. You should review these privacy policies carefully before providing personal information to these websites.

### Protection of Children's Privacy

We understand the importance of protecting children's privacy, particularly in an online environment. Our Site is not designed to attract children under the age of thirteen (13). In accordance with Federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly collect, solicit or accept, personally identifiable information about any person known to be under the age of thirteen (13) years of age.

### California Consumers

The recent passing of the California Consumer Privacy Act (CCPA) provides California residents with specific rights regarding their personal information. Please review our [California Privacy Policy](#) for a detailed understanding of your CCPA rights and how to exercise those rights.

### Nevada Consumers

Nevada law allows Nevada consumers to request a company not sell their personal information. We do not sell personal information, but this right applies even if personal information is not currently being sold. If you wish to make such a request, please contact us at [privacy@dcm services.com](mailto:privacy@dcm services.com).

### Contact Us

If you have questions or suggestions about our Website or this Policy, please contact us by e-mail at [info@dcm services.com](mailto:info@dcm services.com).

**For Use by:** DCM Services, LLC

**Effective Date this Version:** See date in Revision Record table

**Distribution Authorization:** This document shall be reviewed and updated in accordance with the Company’s Document Maintenance and Control SOP.

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Revision Record		
Rev #	Effective Date	Description of Changes
1.0	Pre 5/23/2019	Placeholder for existing procedures before document standardization.
1.1	5/23/2019	Converted document to internal standard format. RT #250083.
1.2	1/28/2020	Updated: <ul style="list-style-type: none"> <li>California Consumers</li> <li>Nevada Consumers</li> </ul> Per RT #276842
2.0	9/10/2020	Scheduled annual review per RT #274170. Reviewed and no changes needed at this time.
3.0	5/17/2021	Scheduled annual review per RT #326365. Made the following changes: Removed Vanessa Anderson and replaced with Tiffany Jansen.
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5.0	1/1/2023	Scheduled review per RT #399245. Made the following changes: <ul style="list-style-type: none"> <li>Removed Tiffany Jansen and Dereck Eastman as approvers</li> </ul>
5.1	2/8/2023	Per RT #408087 minor web address updated. No approval needed.
6.0	1/1/2024	Scheduled review per RT #436719. Reviewed and no changes needed at this time. Document owner(s) approved as stated in the approval date. Publishing held until Effective Date.