



Valentine & Kebartas LLC  
*"Performance Not Promises"*

## Valentine & Kebartas LLC Data Privacy Policy

August 5, 2020

Version 1.2

This Privacy Statement Regarding Customer and Online User Information ("Privacy Policy") applies to Valentine & Kebartas LLC. This Privacy Statement does not apply to the websites of our Business Partners or service providers. We recommend you review the privacy statements of the other parties with which you interact.

This Privacy policy governs Personal Information we collect from our clients as well as information we collect from vendors and information automatically collected from your online visits (e.g. data collected via cookies).

For the purposes of this Privacy Statement, "Business Partner" is any vendor or other entity with whom we have an ongoing business relationship to retrieve information. "Personal Information" means information that may directly or indirectly identify you, such as your name, telephone number, email address, Credit card number, work information such as job title and company information. We may also collect demographic information, such as your age, gender, Internet Protocol ("IP") address and location data.

"V&K" uses' ("your") personal and non-personal information in connection with providing account receivable collection services. Valentine & Kebartas wants you to understand the information that may be collected from you, how such information is used, and the choices you have regarding V&K's use of this information. Accordingly, this Privacy Policy explains how V&K collects, uses, and discloses your personal identifiable information ("PII") and other information (collectively, "your information"). This Privacy Policy applies to all data collected via all sources including telephone, facsimile, postal mail, personal delivery, or additional offline means or media. V&K will treat your information consistent with this Privacy Policy unless you consent otherwise.

# **Information Valentine & Kebartas LLC Collects**

## **Information you have authorized.**

V&K collects your information in various ways when you use the services of its clients. For example, when you register for and use the Services of V&K clients, V&K collects information, including personal and account information, you submitted to said clients. This may include information such as your name, username, email and mailing address, credit card number, Telephone landline or cellular telephone number. V&K may collect information via a business partner with which you have an account, such as a trade association, V&K may collect certain information from your third-party account, such as name, email address, and other personal information. Please note V&K LLC may combine all information with data collected through its clients, including personal information. This combined information may result in, among other things, a profile about you, which V&K LLC may use in accordance with this Privacy Policy.

In addition to the information collected pursuant to this Privacy Policy, V&K LLC may collect additional information about you if it has your express consent to do so. For example, if you opt to participate in an analysis of your financial statement V&K LLC will collect information that is necessary, including information you submit and information obtained from business partners. As part of your participation you will be presented with and will need to agree to the terms of an Informed Consent, or an equivalent consent agreement, in order to participate. Please review that document carefully as it will outline the specific information to be collected and how it will be used for the analysis. If you make a payment, we may ask for your credit card number and billing information. We may ask for the last four digits of your social security number and other data to process your requests.

## **Automatically collected information.**

Like many other websites and applications, V&K LLC may automatically collect certain non-personally identifiable information. When you utilize V&K's web site, certain information is automatically collected. For example, V&K may automatically collect your Internet Protocol (IP) address, computer operating system, browser type and language, your zip code, the date and time you accessed the web site, the sections or pages of the web site you visited and images and content viewed. V&K may also collect information such as your Device ID and geo-location data. Most mobile devices provide you with the ability to turn off location services. For more information regarding location services, please contact your device manufacturer or mobile carrier. Even if you do not register with V&K, or submit information directly, visiting V&K's web site may automatically collect information

## **Interest-Based Advertising.**

V&K will not engage third-party vendors to use non-personally identifiable information or personal information in connection with their own information to deliver targeted advertising

# How V&K LLC Uses Information

## How V&K LLC Uses Personal Information.

V&K LLC may use your PII to contact and correspond with you, to respond to your inquiries, to process transactions and payments, to facilitate and enhance the use of its services and for other purposes not prohibited by this Privacy Policy.

V&K LLC uses the information collected to provide debt collection or as otherwise described in this Privacy Policy. For example, (a) contact you about your account (b) respond to your feedback, comments, or questions or to send you information related to your debt ; (c) perform research; (d) analyze how you use and interact with V&K ; (e) protect V&K services and the information collected against fraudulent, illegal, or otherwise unauthorized activity, including any investigation into such activity; (f) for any other purpose described in this Policy. (j) for third parties to provide information or other services that V&K LLC believes may aid in obtaining contact with you.

*By providing* your mobile phone number, you expressly consent to receive text or other SMS messages at the number provided to V&K or its clients. Standard message and data rates may apply.

## Legal Basis of Processing

Our legal basis for collecting and using your Personal Information as described in this Privacy Statement will depend on the Personal Information concerned and the specific context in which we collect it. In general, we collect and process your Personal Information on one or more of the following bases:

- Your consent, for example where we have obtained your consent to process your personal data for certain activities (such as the use of cookies for online tracking and analysis). You are free to withdraw your consent at any time for this use by contacting [vkprivacy@v-k-i.net](mailto:vkprivacy@v-k-i.net). If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it. Where applicable, we may ask for your consent to processing at the point where you provide your Personal Information.
  - To comply with a contractual obligation. We will advise you upon collection whether the provision of your personal information is mandatory and of the possible consequences if you do not provide us with your information.
  - For compliance with legal obligations where other laws require the processing of your personal information (for example, safety, taxation and anti-money laundering laws) or where we need your personal information to protect your vital interests or those of another person.
  - V&K's (and its Clients and Business Partners') legitimate interests provided always that our legitimate interests are not outweighed by any prejudice or harm your rights and freedoms.
- If you have any questions or need more information concerning the legal basis on which we collect your Personal Information, please contact us at [vkprivacy@v-k-i.net](mailto:vkprivacy@v-k-i.net).

## ***How V&K Uses Non-Personally Identifiable Information.***

Your non-personally identifiable information can be used by V&K for any lawful purpose. Such information may be archived for future use. Some examples of how V&K may use non-personal information are for system administration purposes, analytics and to improve the services of V&K LLC. Additionally, V&K may use non-personally identifiable information to engage in interactive, real-time discussions with users, which V&K or the users may initiate.

## **How V&K Shares Information**

V&K **will not** sell, rent, or otherwise share your PII with service providers for such service providers direct marketing purposes. In certain circumstances, V&K may share your information with V&K service providers to gain additional contact information. While V&K may undertake efforts to see that service providers to which V&K discloses personal information is under an obligation to use the personal information solely for the purposes for which the information was disclosed such service providers are independent service providers over which V&K exercises no control. V&K is not responsible for, and will not be liable for, the conduct, actions, omissions, or information handling or dissemination practices of business partners or service providers. Such companies will be obligated to protect the confidentiality of your PII. V&K may share your PII if V&K reasonably believes it is necessary in order to comply with laws, regulations, legal processes (such as subpoenas or warrants) or any other legal or regulatory request. For the avoidance of doubt, nothing in this Privacy Policy prohibits the sharing of information, including PII, necessary for V&K to follow the law, as permitted by law, or to give you the best service on your accounts with V&K.

## **Security**

At Valentine & Kebartas LLC, our managers and employees are obligated to adhere to Data Protection & Privacy. V&K uses a combination of commercially reasonable technical and administrative safeguards to protect the integrity of your information. V&K adheres to the following but not is not limited to:

The collection and use of personal data is for the collection of debt only;

Personal data collected is of quality and proportional to its uses;

Personal data is accurate and kept up to date;

Appropriate data retention policies are applied;

Appropriate security and confidentiality controls are implemented;

Transfers to suppliers are secured;

Encryption is used when collecting or transferring sensitive information, such as credit card details;

Technical and organizational measures are designed to ensure the ongoing integrity, availability and resilience of processing systems and services;

V&K Limits physical access to our premises;

Limiting access to the information we collect about you;

Ensuring that we and our Business Partners and service providers have appropriate security safeguards to keep Personal Information secure;

Where required by law, destroying or de-identifying Personal Information.

## **Other Notices and Important Information**

### **Children's Privacy.**

Services of V&K are not intended for children under the age of 18.

### **International Transfer.**

Your information may be transferred to, and maintained on, computers located outside of your state. V&K's Services are intended for use only in the United States.

### **California Privacy Rights.**

Pursuant to the California Civil Code, California residents have the right to request for a disclosure from companies doing business in California of all disclosures of their PII during the prior year to third parties, for such third parties direct marketing purposes. As noted above, V&K does not share your PII with third parties for their direct marketing purposes. For any questions regarding this section of V&K's Privacy Policy, please contact V&K at the information below.

### **Changes to this Privacy Policy.**

V&K may update this Policy from time to time to reflect changes or updates to V&K's technology, data practices, and other factors. Changes to this Policy will become effective when published in the revised Policy, unless otherwise noted. Please check the "Last Updated" date at the bottom of this page to see when this Policy was last revised. Your continued use of Services following the effective date of these changes indicates your consent to the practices disclosed in the update Privacy Policy.

## Conditions.

Use of the web site is governed by, and subject to this Privacy Policy and is incorporated therein. Your use or accessing of the web site constitutes your agreement to be bound by the Terms of Use.

## Contact Information.

For any questions regarding this Privacy Policy, or V&K's data practices, please direct your inquiry to:

[vkprivacy@v-k-i.net](mailto:vkprivacy@v-k-i.net)

or

Valentine & Kebartas LLC, Attn: Privacy, 15 Union St. Ste 202, Lawrence MA 01840

### Revision/Review History

Date	Revision	Comments	Editor
08/09/19	1.0	Created	Anne Box
08/12/19	1.1	Revised	Anne Box
08/05/20	1.2	Revised	Anne Box

To be completed by V&K employees upon hiring.

Name:

Job Title:

Address:

Phone:

I, \_\_\_\_\_, have read and understand the Data Privacy Policy.

As a Valentine & Kebartas employee, I read and will abide by this policy. I further agree to comply with the confidentiality guidelines signed by me. I understand that failure to follow these requirements could result in permanent termination from Valentine & Kebartas, LLC.

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Signed Name \_\_\_\_\_ Date \_\_\_\_\_