Privacy Policy

Autovest L.L.C. Privacy Policy was updated on 1-1-2020.

Your privacy is important to Autovest, L.L.C. (Autovest). Our Privacy Policy covers how AUTOVEST uses, maintains and discloses your personal information. This Privacy Policy is part of our Terms of Use. When we update this Privacy Policy, any changes are effective immediately.

We encourage you to frequently check this page for any updates. You acknowledge and agree that it is your responsibility to maintain a valid email as a registered user, review this Site and this Privacy Policy periodically, and to be aware of any changes made to this Privacy Policy. Your continued use of the Site after such modification will constitute Your acknowledgment and acceptance of the modified policy and agreement to abide and be bound by the modified policy.

Personal Information We Collect

Personal identification information is data that can be used to identify or contact you.

In order to provide and improve our services, we collect personal information. Most of the information we have is provided to us by the creditor and/or collected directly through the use of our services, emails, web applications and phone calls.

Here are some examples of the types of personal information AUTOVEST may collect and how we use it:

- When an account is purchased by AUTOVEST, the previous creditor provides a variety of information including, but not limited to, full name, date of birth, social security number, phone number, address, email address, account number, original creditor, current creditor, balance, payment history.
- We may collect any information that you provide to use directly whether you contact us by phone, email, SMS, web application or other channel. For example, when you access AUTOVEST web applications and fill out a form or sign up for a payment plan and provide information such as your first and last name, email address, mailing address, phone number, and/or other personal identifying information.
- When you access our web applications we may collect a variety of information and store it in log files, including, but not limited to, Internet Protocol (IP) address, browser type and language, Internet service provider (ISP), type of computer operating system, date/time stamp, user interface interaction data (such as, but not limited to, any mouse clicks or navigation on our emails and web applications), uniform resource locator (URL) information (showing where you came from or where you go to next), email open rates, credit card, bank account information.

Using Personal Information

We use personal information to property identify the specific consumers for whom we provide our services, to provide and improve our services, to analyze trends, administer our web applications, to comply with state, federal and local laws and to demonstrate compliance with those laws.

Here are some examples of how AUTOVEST uses personal information:

- We use personal information to send you communications about your account.
- We use your personal information to verify your identity. For example, when you contact our office you will be asked to provide your personal information so that we can verify your identity and account. We may ask you to provide your full name, address, email address or other identifying information. You can always refuse to supply personal information, except that we may not be able to communicate if we are unable to verify your identity and/or account.
- We use personal information to process payments and other account activity you authorize.
- We use personal information to help us create, develop and improve our content and services, including through internal auditing and data analysis.

In all of our emails we use pixel tags. Depending on your email provider, pixel tags can enable us to tell us whether the email has been opened. If you prefer not to be tracked in this way, you should not open our emails.

AUTOVEST's web applications may also use cookies to gather information so that we can improve the effectiveness of our services. You may choose to set your web browser to refuse cookies or to alert you when cookies are being sent but some parts of the website may not function properly without accepting cookies.

AUTOVEST web applications do not recognize or act on "do not track" requests from a browser. The information we receive through tracking is treated as non-personal information unless local law requires, we treat it as personal information. Additionally, if this information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

Sources of Personal Information

We received your personal information from the previous creditor who assigned your account to AUTOVEST.

We also receive information from you directly either through a phone call, email correspondence and/or through visits to our web applications.

We also sometimes receive information from third party vendors who help us confirm the validity of our information as it relates to address, phone number, bankruptcy, and deceased information.

Disclosure to Third Parties

We only share personal information with a limited number of third-party service providers who help us provide our services, including, but not limited to, payment processing, mailing, information verification, managing and enhancing customer data, improving our product and services. When we share information, we require those third parties to handle it in accordance with relevant laws. We also only share the minimum amount of information necessary for the particular third party to assist us in providing our services.

Here are some examples of how AUTOVEST shares personal information:

- For payment processing, we share your bank information to complete the payment you authorized.
- For content delivery, we share your email address, physical address, or phone number with the delivery service to deliver any communication, message, or requested account documents.
- For collectability, we share name and address to ensure no bankruptcy, deceased, address or phone number changes have occurred since we received the account.
- For debt collection licensing, we share account information with state regulators conducting an audit pursuant to state or federal licensing statutes.
- We may be occasionally required by law enforcement or judicial authorities to provide information. We will disclose personal information pursuant to a court order, subpoena, or to cooperate with a law enforcement investigation.

We may also be required by law to provide your information to a local, state or federal government authority or court. We will only disclose information in these instances when there is a lawful basis or if disclosure is reasonably necessary to demonstrate compliance with the law.

In the event of a reorganization, merger or sale we may transfer any and all personal information we collect to the relevant third party.

We may share generic aggregated demographic information not linked to any personally identifiable information with our clients, potential clients, and federal, state and local regulators regarding visitors and users, and their interaction with our products and services.

No Sale

We do not sell personal information. We do not allow our third-party service providers to sell this information or otherwise use it for marketing purposes.

Integrity and Retention of Personal Information

AUTOVEST will retain your personal information for the period required to fulfill our services, meet our contractual obligations, and as required by law. When assessing these periods, we only retain it for the shortest possible period unless a longer retention period is required by law.

Access to Personal Information

You can help ensure that your contact information and preferences are accurate, complete, and up to date. You can view your account information through any of the links in an AUTOVEST email.

To request that we correct the data, if it is inaccurate, reply to the AUTOVEST email, lsoller@autovestllc.com, or call 1-800-221-8160. You can also request we delete the data if we are not required to retain it for legitimate business purposes or by law.

How We Protect Your Information

AUTOVEST is serious about data security. We seek to implement the best practices in data collection, storage, processing, and security to protect against unauthorized access and disclosure. AUTOVEST protects your personal information during transit using encryption such as Transport Layer Security (TLS) and at rest using encryption such as AES 256. When your personal data is stored by AUTOVEST, we use computer systems with limited access housed in facilities using physical security measures.

Unfortunately, no data transmission over the internet or any wireless network can be guaranteed to be 100 percent secure. While we strive to protect your information, you acknowledge that: there are security and privacy limitations beyond our control; the security, integrity, and privacy of any and all information exchanged cannot be fully guaranteed; and any such information and data may be viewed or tampered with in transit by a third party.

Third Party Websites

You may find links to third party websites on the AUTOVEST web applications. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website is subject to that website's own terms and policies.

How We Delete

We are required to keep your data due to the underlying contractual relationship between you and the creditor. We are also required to keep the personal information for legal reasons for as long as the statute of limitations period lasts for the type of account in collections and for other statutory obligations which sometimes are longer (such as a state licensing statute requiring us to maintain records for a certain period of time or the statute of limitations for a consumer financial law). Once our legal obligation to keep your personal information has expired, we delete the information from our systems in accordance with our data retention policies and procedures.

Contacting Us

If you have any questions about this Privacy Policy, please contact:

Lisa Soller
Director of Compliance
Email: Lsoller@autovestllc.com
Phone: 1-800-221-8160
Direct: 248-359-2199

California Consumer Privacy Act for California Residents

Why We Are Providing This Notice to You

We are providing this notice to inform California consumers about how we collect, use, and disclose personal information and about the right California consumers have regarding their personal information. This notice only applies to visitors, users, and other who reside in the State of California ("consumers" or "you"). We are providing this notice to you in compliance with the California Consumer Privacy Act of 2018 (the "CCPA"). If terms used in this notice are defined in the CCPA, they have the same meaning here as they do in the CCPA.

Please note that this notice is in addition to, but does not replace, the information contained in the Privacy Notice of Autovest, LLC. You should read both documents carefully and understand them.

This Notice Does Not Apply to Everyone or to All Types of Information

The CCPA applies to certain information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("Personal Information").

Under the CCPA, Personal Information does not include publicly available information from government records or certain de-identified or aggregated consumer information. In addition, the CCPA does not apply at all to some specific types of information, like (1) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the California Confidentiality of Medical Information Act ("CMIA"), or clinical trial data; or (2) personal information covered by sector-specific privacy laws, including the Fair Credit Reporting Act ("FCRA"), the Gramm-Leach-Bliley Act "GLBA"), the California Financial Information Privacy Act ("FIPA"), and the Driver's Privacy Protection Act of 1994. Accordingly, this notice does not apply to these types of information.

We only knowingly collect information that is subject to the GLBA or which otherwise is not included in the CCPA's definition of Personal Information. Therefore, we do not knowingly collect any Personal Information that is subject to the CCPA. This notice is therefore only applicable in the unlikely event we have collected information subject to the CCPA. For information on how we collect and use information subject to the GLBA, please see our Privacy Notice.

This notice also does not apply to consumers who do not reside in the State of California.

Information We Collect

We only knowingly collect information that is covered by the GLBA and, therefore, exempt from the CCPA, or information that is otherwise not included in the CCPA's definition of Personal Information.

In the unlikely event we collected any Personal Information about you in the preceding 12 months that is not exempt from the CCPA, such information would be included in the following categories. **PLEASE NOTE: Although we may have inadvertently collected Personal Information from these categories to the extent described below, we would not necessarily have collected all of the specific pieces of Personal Information described within a particular category of Personal Information, or any of them, for any individual consumer:**

Category	Specific Pieces of Personal Information in This Category, Per Cal. Civ. Code §1798.140 (o) (1) (A)-K)	Collected?
A. Identifiers	"Identifiers such as real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, Driver's license number, passport number, or other similar identifiers."	YES
B. Personal Information categories listed in Cal. Civ. Code § 1798.80(e)	The categories of information listed in section 1798.80 of the California Civil Code including, among other things, name, signature, Social Security number, address, telephone number, driver's license or state	YES

	identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	
C. Protected classifications under California or federal law	The categories of protected classes under California or federal laws including, among other things, race, color, sex/gender, age, and other classifications protected by law.	NO
D. Commercial Information	"Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies."	YES
E. Biometric information	Physical or behavioral human characteristics that can be used to digitally identify a person to grant access to systems, devices or data.	NO
F. Internet or other electronic network activity	"Internet or other electronic network activity information, including, but not limited to, browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement."	NO
G. Geolocation Data	Information that can be used to identify an electronic device's physical location.	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	"Audio, electronic, visual, thermal, olfactory, or similar information"	YES
I. Professional or employment-related information	Information such as current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 232g, 34 C.F.R. Part 99))	Information such as education records directly related to a student maintained by an educational institution or party acting on its behalf.	NO
K. Inferences drawn from other Personal Information	Inferences drawn from any of the above categories to create a profile about the consumer "reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes."	NO

Sources of Personal Information we Collect

We only knowingly collect information that is covered by the GLBA and, therefore, exempt from the CCPA, or information that is otherwise not included in the CCPA's definition of Personal Information. In the unlikely event we collected any Personal Information about you in the last 12 months that is not exempt from the CCPA, each of the above-listed categories would have been collected from the following categories of sources:

- Directly from the companies we purchase accounts from or their agents. For example, from documents provided to us from those companies related to the accounts we buy.
- Directly from consumers or their agents. For example, through information we collect from consumers in the course of providing services to them.
- Indirectly from consumers or their agents. For example, through information we collect from our consumers, their agents, or from external sources to which consumers or their agents have provided information, in the course of providing services to the consumers.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.

- From third parties that interact with us in connection with the services we perform. For example, from vendors who assist us in performing services for consumers.

Use of Personal Information

We only knowingly collect information that is covered by GLBA and, therefore, exempt from the CCPA, or information that is otherwise not included in the CCPA's definition of Personal Information. In the unlikely event we collected any Personal Information about you in the last 12 months that is not exempt from the CCPA, we potentially would have disclosed or used Personal Information from each of the above-listed categories for one or more of the following business purposes, if permitted by applicable law:

- To fulfill or meet the reason for which the information is provided. For example, if you have provided Personal Information to us, or to a company we purchase accounts from, for a transaction or service to be provided, we will use that information for the purpose for which it was provided.
- To provide you with information, products or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, or between you and the companies we purchase accounts from, including for collection purposes.
- To improve our website and present its contents to you.
- For testing, research, analysis and development.
- As necessary or appropriate to protect the rights, property, or safety of us, our affiliates, or others.
- To respond to law enforcement requests, and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.

We will not collect additional categories of Personal Information or use any Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We only knowingly collect information that is covered by the GLBA and, therefore, exempt from the CCPA, or information that is otherwise not included in the CCPA's definition of Personal Information. In the unlikely event we collected any Personal Information about you that is exempt from the CCPA, we potentially would have disclosed your Personal Information from each of the above-listed categories to a third party for a business purpose in the last 12 months, if permitted by applicable law. If we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose expect performing the contract.

In the unlikely event we collect any Personal Information about you that is exempt from the CCPA in the last twelve (12) months, we potentially would have disclosed the following categories of Personal Information for a business purpose:

Category A:	Identifiers
Category B:	Personal Information Categories list in Cal. Civ. Code 1798.80 (e).
Category C:	Protected classifications characteristics under California or federal law.
Category D:	Commercial Information
Category H:	Audio, electronic, visual, thermal, olfactory, or similar information.

In the unlikely event we have disclosed any Personal Information about you that is subject to the CCPA, we potentially would have disclosed Personal Information for a business purpose from each of the above-listed categories to the following categories of third parties:

- Our affiliates.
- Service Providers.
- 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.

We do not sell any Personal Information, including without limitation any Personal Information of minors under the age of 16 either with or without affirmative authorization. Accordingly, we have not sold any Personal Information in the last 12 months.

Your Rights and How to Exercise Them

The CCPA provides California consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

A. Your Rights Under the CCPA

1.) The Right to Know Personal Information

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, and confirm that we have Personal Information about you that is applicable under the CCPA, we will disclose the following to you unless the information is exempt from CCPA:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information. **Please note that we do not sell any Personal Information.**
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you.
- We do not sell any Personal Information, but if we disclosed your Personal Information for a business purpose, a separate list of disclosures for a business purpose, identifying the categories of Personal Information that each category of recipient obtained.

2.) The Right to Deletion of Personal Information

You have the right to request that we delete any Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request and confirm that we have Personal Information about you that is subject to the CCPA, we will delete (and direct our service providers to delete) your Personal Information from our records unless an exception applies, or the information is exempt from the CCPA.

We may deny your deletion request if retaining the information is necessary for us or our services providers to:

1. Complete the transaction for which we collected the Personal Information, provide the service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code 1546 *et seq*.)
5. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

6. Comply with a legal obligation.
7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3.) *Right to Non-Discrimination*

You have the right to be free from discrimination for exercising your rights and we will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services.
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level of quality of services.
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

B. Exercising Your Rights

1. Where to Submit Your Request

To exercise the rights described above, please submit a verifiable consumer request to us by any of the following methods:

- Calling us at (248) 359-2199
- Send an email to lsoller@autovestllc.com
- Sending a request by mail to: P.O. Box 2247, Southfield, MI 48037 Attn: Director of Compliance

2. Who Can Submit a Request

Only you, or a person (either a natural person or a person registered with the California Secretary of State) that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information.

If you choose to authorize another person to make a verifiable consumer request on your behalf, we will require that person to provide with either a copy of a valid power of attorney or written permission from you authorizing them to submit the request on your behalf. Unless your authorized agent provides us with a valid copy of a power of attorney, we will also require them to verify their identity directly with us before we will respond to the request.

3. Contents and Numbers of Requests

You may only make a verifiable consumer request twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to verify you are the person about whom we collected Personal Information or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

4. Verifying Your Identity

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authorization to make the request and confirm the Personal Information relates to you. Please note that we will require you to provide different information depending upon the specific right(s) you are choosing to exercise. For example:

- If you choose to request specific pieces of information in exercising your Right to Know Personal Information, we must verify your identity to a reasonably high degree of certainty. This means we will require you to provide at least three pieces of information that we consider reliable for determining your identity that we can match to information in our database. We will also require you to submit a declaration signed under penalty of perjury that you are the consumer whose Personal Information is subject to the request.
- If you request categories of Personal Information and do not request specific pieces of Personal Information, we must verify your identity to a reasonable degree of certainty and will require that you provide at least two

pieces of information that we consider reliable for determining your identity that we can match to information in our database.

- If you request deletion of Personal Information, we may need to verify your identity to either a reasonable degree or certainty or a reasonably high degree of certainty using the processes described above, depending upon the Personal Information you ask us to delete.

Making a verifiable consumer request does not require you to create an account with us.

C. When and How We Will Respond to Your Request

We endeavor to respond to a verifiable consumer request within 30 days of its receipt. If we require more time (up to an additional 45 days for a total of 90 days from the date we received your request), we will inform you of the reason and extension period in writing. If you do have an account with us, we may deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding our receipt of a verifiable consumer request. The response we provide will also explain the reason we cannot comply with a request, or are not required to comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable consumer request.

Changes to Our Privacy Notice

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 by mail, email, or through a notice on our website homepage, at our option.

Contact for More Information

If you have any questions or comments about this notice, the ways in which we collect and use your Personal Information, 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: (248) 359-2199

By email: lsoller@autovestllc.com

Website: www.autovestllc.com/privacy

By Mail: P.O. Box 2247, Southfield, MI 48037