

# Razor Capital, LLC Privacy Policy

**Last Updated: January 1, 2020**

This Privacy Notice is being provided on behalf of Razor Capital, LLC.

**Information We May Collect:** Razor Capital, LLC may collect the following personal information:

1. Information that we receive from your account file at the time we purchase or begin to service your account, such as your name, address, social security number, and assets;
2. Information that you may give us through discussion with you, or that we may obtain through your transactions with us, such as your income and payment history;
3. Information that we receive from consumer reporting agencies, such as your creditworthiness and credit history; and
4. Information that we obtain from other third party information providers, such as public records and databases that contain publicly available data about you, such as bankruptcy and mortgage

All of the personal information that we collect is referred to in this notice as “collected information”.

**Confidentiality and Security of Collected Information:** At Razor Capital, LLC, we restrict access to collected information about you to individuals who need to know such collected information in order to perform certain services in connection with your account. We maintain physical safeguards (like restricted access), electronic safeguards (like encryption and password protection), and procedural safeguards (such as authentication procedures) to protect collected information about you.

**Sharing Collected Information:** Razor Capital, LLC only shares collected information about customers and former customers with:

1. Its affiliates in connection with administering and collecting accounts to the extent permitted under the Fair Debt Collection Practices Act or applicable state law; or
2. Third parties that provide collection related services on our behalf as permitted in connection with administering and collecting accounts under the Fair Debt Collections Practices Act and applicable state

Razor Capital, LLC restricts sharing of your information for any marketing purposes.

For any questions about the restricted use and the privacy of your information please contact us toll free 1-800-713-0670 or go online to [www.absoluteresolutions.com](http://www.absoluteresolutions.com).

## **IMPORTANT INFORMATION FOR CALIFORNIA RESIDENTS**

# **I. Who Are We?**

Razor Capital, LLC (the “Company”), headquartered in Bloomington, Minnesota, U.S.A., specializes in the purchase of distressed consumer receivables, business cards and lines of credit.

If you have any questions or comments about this Privacy Policy or our practices, please contact us as follows:

Absolute Resolutions Corporation 8000 Norman Center Dr., #350

Bloomington, MN 55437

(800) 713-0670

[info@absoluteresolutions.com](mailto:info@absoluteresolutions.com)

# **A. Who And What Is Covered By This Privacy Policy?**

This Privacy Policy describes the Company’s policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. This Privacy Policy applies both to the Company’s online information gathering and dissemination practices for this website (the “Site”), and information collected or received offline, whether directly from you or from other sources.

If you have arrived at this Privacy Policy by clicking through a link on our Site, or by searching for or clicking on a link directing you to any page of our Site, then this Privacy Policy applies to you. When you use the Site, you consent to the use of your information in the manner specified in this Privacy Policy. This policy may change periodically, as we undertake new personal data practices or adopt new privacy policies, so please check back from time to time. By your continued use of the Site, you consent to the terms of the revised policy.

Use of our Site is strictly limited to persons who are of legal age in the jurisdictions in which they reside. You must be at least eighteen (18) years of age to use our Site. If you are not at least 18 years of age, please do not use or provide any information through this Site.

This Privacy Policy does not apply to any website owned and/or operated by or on behalf of any other entity, even if our Site posts a link to those other websites and you click through from our Site. To the extent that you visit and/or disclose information through other sites, you are subject to the privacy policies and practices of those sites.

## **III. What Personal Information Does The Company Collect, From Where, And Why?**

The following is a description of: (i) the categories of personal information the Company may have collected in the preceding 12 months; (ii) the sources from which we may have collected it; and (iii) the business purposes for which we may have collected it.

### **A. Information We Do NOT Knowingly Collect.**

We do not knowingly solicit, collect, or receive information from or about minors (under the age of 16).

### **B. Information You Provide Directly.**

You may choose to voluntarily submit or otherwise disclose Personal Information to us (e.g., name, address, email address, telephone number, date of birth, social security number, account numbers, financial information, card payment information, or banking information, etc.). That information – whether submitted or disclosed through the various “Contact Us” options on the Site, by mail, e-mail, telephone, fax or electronically, and whether the purpose for your submission is to inquire about your account or our services, make a payment, or apply for employment, etc. – is governed by this Privacy Policy.

If you initiate contact or correspond with us, we may keep a record of your contact information and correspondence, whether oral or written, and we reserve the right to use your contact information, and any other information that you provide to us in your message, to respond thereto, optimize customer service, or attempt to resolve your request or inquiry. Thus, we may use the information you provide to further correspond with you or to accept payment on or otherwise manage your account.

If you wish to change or correct any information voluntarily submitted to us, please do so by contacting us in the manner described below.

Please note that your communications with us are with a debt collector, in an attempt to collect a debt. Any information obtained will be used for that purpose.

## **C. Information From Third Parties Acting On Your Behalf.**

The Company may receive and maintain Personal Information (e.g., name, address, telephone number, email address, date of birth, social security number, account numbers, financial information, court records, etc.) contained in communications with someone other than you, such as your spouse, power of attorney, attorney, or other authorized representative, in connection with the collection of any debt.

## **D. Information We Receive From Clients And Sellers.**

We receive and maintain Personal Information contained in the accounts receivable within the portfolios that we purchase or service, including credit issuers, creditors, and accounts receivable portfolio owners. This information may include a name, date of birth, social security number, information contained on credit applications, the original creditor's account number, employment information, court records, the balance of the account at the time of sale, and the last date a payment was received on an account, etc. We use this information to seek the collection and recovery of accounts receivable, to fulfill responsibilities to our clients, and to analyze potential portfolio purchases. Personal Information that we receive from sellers, as part

of due diligence, is shared with us confidentially for the purpose of analyzing a potential purchase and is subject to a nondisclosure agreement or other confidentiality obligation that prohibits us or our representatives from further disclosing or using the information for any other purpose.

## **E. Information We Receive From Our Service Providers.**

The Company may receive and maintain Personal Information from our Service Providers. Service Providers are persons or entities that we contract with to provide a material service in connection with the recovery of accounts. This may include, for example, location service providers, attorneys, collections agencies, letter vendors, and data service providers that scrub information. Information that we typically may receive includes residential address, phone numbers, bankruptcy activity, military status, death or probate status, credit information, court records, payment records, and correspondence or call recordings with consumers.

## **F. Information We Receive From Credit Reporting Bureaus.**

We receive and maintain Personal Information provided by one or more of the major Credit Reporting Bureaus. We use this information in connection with receivables management and recovery services and to assist with fulfilling obligations to our clients.

## **G. Information Automatically Collected By Use Of This Site**

Our Site automatically collects certain information during a user's visit to the Site. The information may include internet protocol (IP) addresses of your device, the location where the device is accessing the internet, browser type, operating system and other information about the usage of the Site, including a history of pages viewed. We use this information to improve the Site's design, estimate user volume and usage patterns, speed up searches, and improve the user experience by customizing options and recognizing return users. We may also use this information to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. More specifically:

### **(i) IP Address**

Each time a user visits the Site, we may automatically collect an internet protocol (IP) address and the web page from which the user was directed to the Site. In order to administer and optimize the Site and to diagnose and resolve potential issues or security threats to our Site or to the Company, we may use an IP address to help identify users and to gather broad demographic information about them.

## **(ii) Cookies, Pixel Tags, And Web Beacons**

Cookies (browser or flash) are small files that a site or its service provider transfers to a user's device through the web browser (if you allow) that enables the site's or service provider's systems to recognize the browser and capture and remember certain information. We use cookies

to optimize Site functionality and improve a user's experience while navigating through the Site. Most or all browsers permit you to disable or reject cookies. You can do this by adjusting your preferences in the browser. **You can also click on the "Cookies Settings" banner at the bottom of the Site and adjust Cookie Settings to accept or reject certain cookies used by our Site.**

Our Site may incorporate "pixel tags," "web beacons," or similar tracking technologies (collectively, "pixel tags") that track the actions of Site users. Pixel tags are used to collect information, such as the internet service provider, IP address, the type of browser software and operating system being used, the date and time the Site is accessed, the website address, if any, from which a user linked directly to the Site and/or the website address, if any, to which the user travels from the Site and other similar traffic-related information.

We may aggregate information collected from Site visits by various users to help us improve the Site and the services that we provide through the Site.

## **(iii) Do Not Track**

Our Site tracks when visitors enter through a marketing landing page. The Site also keeps a record of third-party websites accessed when a user is on our Site and clicks on a hyperlink. But we do not track users to subsequent sites and do not serve targeted advertising to them.

## **(iv) Analytics Information**

Web servers for the Site may gather anonymous navigational information about where visitors go on our Site and information about the technical efficiencies of our Site and services.

Anonymous information does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples of anonymous information may include certain information about the internet browser, domain type, service provider and IP address

information collected through tracking technologies and aggregated or de-identified data. We use anonymous analytics information to operate, maintain, and provide to you the features and functionality of the Site.

## **IV. What Personal Information Do We Share With Others?**

### **A. We Do Not Sell Personal Information to Third Parties for their Own**

The Company does not sell to third-parties for their own use any of your Personal Information. Except as described in this Privacy Policy, we also do not disclose to third-parties information about your visits to our Site. **Accordingly, there have been no sales of non-public Personal Information to Third-Parties for their own use or further disclosure in the past twelve (12) months.**

The Company does not knowingly collect and does not, and will not, sell non-public Personal Information of minors under 16 years of age without first obtaining affirmative authorization.

### **B. Sharing Personal Information With Clients Pursuant To Contracts Through Which We Act As A Service Provider.**

We may provide your Personal Information to our clients, typically credit issuers or accounts receivable portfolio owners, that engage us as a Service Provider, through a written contract, for the purpose of managing accounts receivable portfolios or otherwise fulfilling our contractual responsibilities. The types of Personal Information we may share with our clients include updated contact information, financial, bank account or payment information, and performance metrics.

## **C. Sharing Information With Our Affiliates And Service Providers.**

We may share your Personal Information with our affiliates and other persons or entities that we contract with to provide a material service, referred to as Service Providers.

Our Service Providers include collection service providers such as collection agencies and law firms, location service providers, data service or security providers, and technological support companies. In connection with providing these business services to the Company, one or more of our Service Providers may have access to identifying Information, such as your name, address, or social security number. We restrict our Service Providers from accessing or using your Personal Information for any purpose other than as reasonably necessary to perform a business purpose that we authorize in the contract, and your Personal Information will not be further used by our Service Providers or disclosed to any Third Party.

## **D. Sharing Personal Information At Your Direction.**

We may share your Personal Information with third parties to whom you or your agents authorize us in advance to intentionally disclose to or allow to use your Personal Information in connection with the services that we provide.

## **E. Sale Of Our Company Or Company Assets.**

In the event of a sale, assignment, liquidation, or transfer of our assets or of any portion of our business, we reserve the right to transfer any and all information that we collect to unaffiliated third-parties in connection with that event.

## **F. Monitoring, Law Enforcement And Legal Requests.**



The Company has no obligation to monitor the Site or the use of the Site or to retain the content of any user session. However, we reserve the right, at all times, to monitor, review, retain and/or disclose any information, as necessary, to satisfy any applicable law, regulation, legal process or governmental request or to cooperate with law enforcement and other authorities in investigating a claim of illegal activity. We may use IP addresses to identify a user when we feel it is necessary to protect the Site, our service, clients, potential clients or others.

## **G. Our Internal Use And Research**

We reserve the full and unrestricted right to use and disclose de-identified information; anonymized information; aggregated information or publicly available information that has not been combined with nonpublic Personal Information for purposes including, but not limited to, our own internal use, data mining, analytics, and research.

## **V. How Do We Protect Your Personal Information?**

The Company takes reasonable security procedures and practices appropriate to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration and destruction. We maintain physical, electronic and procedural safeguards designed to protect against the unauthorized disclosure of Personal Information, and Personal Information is disposed of properly and securely utilizing industry standards. Our data security policies and practices are periodically reviewed and modified as necessary, and subject to third party assessments annually.

**\*\* THE INFORMATION BELOW APPLIES TO CALIFORNIA RESIDENTS \*\***

### **VI. Your Rights Under The California Consumer Privacy**

## **A. The CCPA And Personal**

The California Consumer Privacy Act (“CCPA”), effective January 1, 2020, grants privacy rights to California consumers in connection with their Personal Information.

Personal Information or “PI” is “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.”

A consumer has rights regarding his/her PI, including:

- A right to know what PI is collected, used, shared or sold by the business;
- A right to access PI collected and retained by the business;
- A right to require businesses and, by extension, their service providers, to delete PI, subject to certain exceptions;
- A right to opt-out of the business' sale of PI; and
- A right to non-discrimination in terms of pricing or service for choosing to exercise a privacy right under the CCPA.

## **B. Consumer Right To A Notice of Collection.**

A business subject to the CCPA must, at or before the point of collection of PI, inform a consumer as to the categories to be collected and the purposes for which it shall be used. A service provider that receives or collects PI on behalf of, or at the direction of, a covered business may not be required to provide a notice of collection to the consumer.

## **C. Consumer Right To Know.**

A covered business must disclose in its privacy policy the PI it has collected, sold, or disclosed for a business purpose in the past 12 months.

**Collection:** A business must disclose the following in response to a verifiable request:

- The categories of PI the business has collected about the consumer;
- The categories of sources from which that PI was collected;
- The business or commercial purpose for collecting or selling PI;
- The categories of third parties with which the business shares PI; and
- The specific pieces of PI the business has collected about the consumer making the request;

**Sale:** A business that sells PI or discloses it for a business purpose must disclose, in response to a verifiable request, the following:

- The categories of PI collected about the individual consumer
- The categories of PI the business sold about the individual consumer, and the categories of third parties to which it was sold. Or, if the business has not sold any of the consumer's PI, it must state that fact.

- The categories of PI the business has disclosed about the individual consumer for a business purpose. Or, if the business has not disclosed the consumer's PI for a business purpose, it must state that fact.

## **D. Consumer Right To Delete.**

A California consumer has the right to request that a covered business delete his/her PI, subject to certain exceptions. Once a request is reasonably verified by the covered business, the PI requested to be deleted must be removed from the records held by that business. The business must also direct its Service Providers with whom the information was shared to also delete the information, unless it is subject to an exception.

A request to delete may be denied if retaining the information is necessary to:

1. Complete the transaction for which it collected the PI, provide a good or service requested by the consumer, take action reasonably anticipated within the context of the ongoing business relationship with the consumer, or otherwise perform a contract with the consumer.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such
3. Debug products to identify and repair errors that impair existing intended
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with the
8. Comply with a legal obligation.
9. Make other internal and lawful uses of the information that are compatible with the context in which the consumer provided

## **D. Consumer Right To Non-Discrimination.**

A business must not discriminate against a consumer who exercises CCPA rights. A business may charge different prices or provide a different quality of goods or services, but only if the difference is reasonably related to the value provided to the consumer by the consumer's data. A business may offer financial incentives to a consumer for the collection, sale, or deletion of personal information on a prior, opt-in consent basis.

## **E. Consumer Right To Opt-Out.**

A business that sells PI to third parties must provide notice to consumers, clearly inform them of the right to opt out of the sale, and provide a "Do Not Sell My Personal Information" link on its website that enables the consumer to opt out of future sales.

A business is prohibited from selling the PI of a consumer the business knows is less than 16 years of age, unless (for a child between 13 and 16 years of age) the child has affirmatively authorized the sale or (for a child less than 13 years of age) the child's parent or guardian has affirmatively authorized the sale.

## **F. Privacy Policy Requirements.**

A business must include the following in its privacy policy, to be updated every 12 months:

- A description of consumer CCPA rights, including the right to opt out of the sale of PI and a separate link to a "Do Not Sell My Personal Information" internet webpage if the business sells PI;
- The method(s) by which a CCPA request can be submitted; and
- A list of the categories of PI the business has collected, sold, or disclosed for a business purpose in the preceding 12

## **VII. How Do I Exercise My CCPA Rights?**

### **A. Instructions For Submitting A CCPA Consumer Rights Request To Us**

If you are a California resident and wish to submit a CCPA Request to Razor Capital, LLC, you may use one of the following methods:

**Fill out a Form on this Website:** <https://absoluteresolutions.com/contact/privacy-policy/ccpa-request/>

**Call us, Toll-Free, at:** 800-713-0670

Please be advised that we are only required to respond to your request to know or access twice in any 12-month period.

We are required to keep records of your CCPA request for at least 24 months, including any assigned reference number, the request date and nature of the request, the manner in which the request was made, the date and nature of our response, and the basis for any full or partial denial.

## **B. Verification Of The Person Making A Request.**

We need to be reasonably sure that the person making the request about your PI is you, or a representative authorized to make a request on your behalf.

We cannot comply with your request if we cannot verify your identity or your authority to make a request for another person. Accordingly, we will ask for information such as your full name, mailing address, last four digits or your social security number, etc., to attempt to verify your identity and locate your records, if any.

To the extent possible, we will not ask you for new information to verify your identity, but instead will request information that we can cross-check against existing records. If we are unable to verify your request without new information, we will delete the new information as soon as practical after processing your CCPA request, except as may be required to comply with the CCPA's record retention requirements.

We will never require you to create an account with us in order to verify your request, but if you already have an account we may use that information to assist with verification. We will only use information you provide to us during the verification process to try to verify your identity or your authority to make the request for another person.

Requests to access the specific pieces of information we may hold, and not just a list of the categories of information, require heightened verification procedures, and we will require you to submit a written declaration under penalty of perjury stating that you are the consumer whose PI is the subject of the request. In addition, certain pieces of information, such as a social security number, driver's license number or other government-issued identification number or financial account numbers, will not be disclosed in response to a CCPA request.

If you wish to authorize someone else to act on your behalf in connection with your CCPA rights, we must receive proof that this person is authorized to do so. Proof can be provided by a consumer verifying his/her own identity directly with us and then providing written authority for a designated person to act on the consumer's behalf, or through receipt of a power of attorney or other legal documentation of authority, or proof of registration with the California Secretary of State as a designated representative of another consumer. You may also make a verifiable consumer request on behalf of your minor child.

## **C. How and When Will We Respond?**

Within 10 days of receipt of your request, we will provide an initial confirmation with an assigned reference number.

If you submit a Request to Delete, we are required to re-confirm your choice to delete the information after verifying your request, but prior to actual deletion.

The Company strives to provide a response within 45 days of receiving your request. If we need additional time, we will let you know.

We will send our response to your request by U.S. mail or email, at your option. Any information we provide will cover only the 12-month period preceding receipt of your request.

If we cannot respond to or comply with your Request to Know or Request to Delete, because, for example, we cannot verify your identity or because an exception applies, we will explain our reasoning and decision in our response.

We do not charge a fee to process your request unless it is excessive, repetitive, or manifestly unfounded, and we have informed you in writing of the reasoning behind a charge and its estimated cost. We will provide a cost estimate before completing your request if we determine that a charge is warranted.