



## **POLICY STATEMENT:**

Privacy is important to The Stark Agency. This Privacy Policy covers how The Stark Agency collects, uses, maintains, and discloses personal information.

The Stark Agency, Inc. (The Stark Agency) is sensitive to privacy issues. We believe it's important for you to know how we treat your information we receive via our internet sites, hestark.com and paystarkagency.com (sometimes referred to as the "Sites"), or through other channels. The Stark Agency will not use or disclose any of your information in a manner that is prohibited by applicable laws and regulations.

### Personal Information We Collect

The Stark Agency has collected the following categories of personal information from individuals within the past twelve (12) months:

- Identifiers, such as real name, alias, unique personal identifier, online identifier, Internet Protocol address, account name, or other similar identifiers.
- Personal information such as, signature, education, employment, employment history, credit card number, or any other financial information.
- Information provided to us by our client when they transfer an account to The Stark Agency could include, but is not limited to, full name, date of birth, social security number, phone number, address, email address, original creditor, current creditor, creditor account number, current balance, and payment history.
- Information collected when you communicate with The Stark Agency directly by phone, email, SMS, web applications, or other channels. For example, when you access The Stark Agency web applications and complete a form or enroll in a payment plan and provide information such as our first and last name, email address, mailing address, phone number, credit card information and/or other personal identifying information.

- Information collected when you access The Stark Agency through email or The Stark Agency's web applications 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 email and web applications), uniform resource locator (URL) information (showing where you came from or where you will go to next), email open rates, credit card information, and bank account information.
- Other information collected may include, but not limited to, geolocation data and sensory data, such as call recordings; and professional (or employment) related information.
- Inferences drawn from any of the information identified to create a profile about a consumer reflecting the consumer's preferences, characteristics, behaviors, attitudes, abilities, and aptitudes, including employee assessments for retention purposes, and consumer ability to pay.

The Sites are not designed for or intended for the use of persons under the age of 18. It is our policy that visitors to our Sites who are under the age of 18, should not post on or provide information to our Sites without the consent of their parent or guardian.

### Using Personal Information

We, or our service providers, may use the personal information you provide for any of the following purposes: (1) to understand the use of our Sites; (2) to make improvements; (3) to respond to specific requests from visitors; (4) to provide any necessary notices to our visitors or their parent or guardian, where necessary; (5) to protect the security or integrity of our Sites when necessary; (6) to send you communications regarding the Sites or our business; (7) to process payments and other authorized account activity; (8) to evaluate your candidacy and contact you, if you apply for a job at The Stark Agency; or (9) to verify your identity. For example, when you contact The Stark Agency, you will be asked to provide your personal information so that we can verify your identity. You can refuse to supply personal information; however, we then may not be able to communicate with you if we are unable to verify your identity.

Stark's Sites use Google pixel tags. Pixel tags can help us to understand how users interact with the site to improve the user experience. Pixel tags can also help us understand the users of our Sites so that we may better understand

how users arrived at pages on the Sites to help improve the user experience. If you prefer not to be tracked in this way, you should not use our Sites.

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

In some of our email messages, we use a “click-through URL” linked to webpages on the Sites and some linked to web pages on third party sites (see Third Party Websites below). We track this click-through data to ensure you can access information in the electronic form and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

The Stark Agency’s web applications may also use cookies to gather information so that we can improve the effectiveness of our services. You may choose to refuse non-necessary cookies, but some parts of the website may not function properly without accepting cookies.

### Sources of Personal Information

We receive your personal information from the party placing your account with The Stark Agency for services. We also receive information from you directly either through a phone call, text message, 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. If you are a potential candidate for employment with The Stark Agency, we may have received your personal information from a recruiter or external website.

### Disclosure to Third Parties

We will not share your personal information with others, except as indicated below. We do not allow any personal information to be used by third parties for their own marketing purposes. However, in some circumstances we may need to provide personal information to third parties in order to provide you services or when necessary for our vendors to provide services to us. The following third parties may use your personal information:

- The Stark Agency’s clients

- Service providers including, but not limited to, payment processing, mailing, information verification, litigation, managing and enhancing customer data, and improving our product and services
- Consumer reporting agencies (a/k/a credit bureaus)
- Law enforcement or judicial authorities pursuant to a court order, subpoena, or to cooperate with a law enforcement investigation
- Local, state or federal government authority or court when required by law
- A consumer or third party in connection with the collection of a debt when permitted by law
- Third parties with whom you authorize us to share your information

Some circumstances where third parties may use personal information include: for payment processing, credit card or bank information is sent to the card-issuing bank to complete the payment you authorized; for content delivery, your email address, physical address, or phone number may be provided to the delivery service to deliver any communication, message, or requested account documents; for debt collection licensing, account information may be sent to state regulators conducting an audit pursuant to state or federal licensing statutes.

When we provide information to third parties, we require them to handle it in accordance with relevant laws. We also only provide the minimum amount of information necessary for the third party to assist us in providing our services.

We may provide generic aggregated demographic information not linked to any personally identifiable information to 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 personally identifiable information.

### Do Not Track (DNT)

We do not track our customers over time and across third party websites to provide targeted advertising and therefore do not respond to DNT signals. We do not sell your information about your visit with third parties.

### Retention of Personal Information

We will retain your personal information in accordance with internal and regulatory requirements to fulfill our services, meet our contractual obligations, and to satisfy legal requirements.

### How to update your records

It is your responsibility to provide us with a true, accurate and complete email address and other contact information, and to promptly provide us with any updates to your contact information. You may provide updated contact information to us by calling: 877-274-7764 or emailing us at: [contact@starkforyou.com](mailto:contact@starkforyou.com)

### How we protect your information

We have security measures in place to guard against the loss, misuse, and alteration of the information under our control. If for some reason The Stark Agency discovers that non-public personal information is the subject of a data security breach, we will comply with applicable laws and regulations to notify you of such a data security breach.

### Third Party Websites

The Sites may contain links to other sites of third parties. We are not responsible for the content or privacy practices of those other sites. By including a link to a third-party site, we do not endorse or recommend any products or services offered or information contained at the third-party site. We are not responsible for the content or privacy practices of those other sites. Such third party may have a privacy policy different from that of ours and the third-party site may provide less security protection than our Sites. If you decide to visit a third-party site via a link contained on our Sites, you do so at your risk.

### 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 or the statute of limitations for a consumer financial law).

### Contacting Us

Consumers with questions about our privacy policy or practices may contact us toll free at: 877-274-6674 or by email at: [help@starkforyou.com](mailto:help@starkforyou.com).

### California Consumer Privacy Act

Under the California Consumer Privacy Act (CCPA), California residents may have the right to:

- Request that a business delete any personal information about the consumer which the business has collected via the Sites and other channels.
- Request that a business that collects personal information about the consumer disclose to the consumer, free of charge, the following:
  - o The categories of personal information that it has collected about that consumer.
  - o The categories of sources from which the personal information is collected.
  - o The business or commercial purpose for collecting or selling personal information.
  - o The categories of third parties with whom the business shares personal information.
  - o The specific pieces of personal information it has collected about that consumer.
- Request that a business that sells the consumer's personal information, or that discloses it for a business purpose disclose, free of charge, to the consumer:
  - o The categories of personal information that the business collected about the consumer.

- o The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.

- o The categories of personal information that the business disclosed about the consumer for a business purpose.-

- Direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information.

A request may be made by an authorized agent. If a consumer uses an authorized agent to make a request, the consumer must provide written permission for The Stark Agency to respond to the authorized agent.

All requests must be verifiable; meaning that there must be enough identification information in the request so that The Stark Agency may confirm that the person making the request is the same person about whom the request concerns. The Stark Agency will verify the request by comparing the identifying information provided in the request with the information in our records. When submitting your request, please include your name, mailing address, date of birth, and the last four digits of your social security number, so that The Stark Agency can verify your identity and respond to your request.

All requests for information and to delete will be investigated by The Stark Agency. The Stark Agency will respond to your request or notify you if it cannot verify your request.

We believe that the type of services we provide are exempt from coverage under the CCPA. If you are a California resident and want to exercise CCPA rights, please contact us toll free at: 877-274-7764 or by email at: [help@starkforyou.com](mailto:help@starkforyou.com).

We will not discriminate against you because you exercise any of the rights as described in this Privacy Policy.

This policy was last updated on 3/27/2024