

**Privacy Policy**  
**First National Collection Bureau, Inc. (FNCB, Inc.)**

*FNCB, Inc. Privacy Policy – Revised August 2, 2019*

First National Collection Bureau, Inc. (FNCB, Inc.) is a Debt Collector attempting to collect a debt and any information obtained will be used for that purpose.

This communication is from a debt collector.

This Privacy Policy covers the collection of both personal and non-personal information and how FNCB, Inc. uses that information.

This Privacy Policy applies to the website of FNCB, Inc., and outlines how FNCB, Inc. handles non-personal and personal information when someone visits the website, contacts us, or makes a payment.

We reserve to change this Policy from time to time, without notice and in our sole discretion. If our policy changes, we will update this page.

This Privacy Policy also governs your access of FNCB, Inc. website, regardless of how you access it, and by using the FNCB, Inc. website, you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy.

FNCB, Inc.'s website may contain links to websites maintained by others. This Privacy policy does not extend to the collection of personal information by any website maintained by others.

The information collected by FNCB, Inc. through this site is for its own business purposes.

FNCB, Inc. does not sell, rent, lease, or share any information collected on this site to non-affiliate third parties.

FNCB, Inc. in compliance with the Children's Online Privacy Protection Act, does not knowingly collect or use personal information from children under 13 years of age.

**Customer Service**

It is FNCB, Inc.'s intention to provide superior customer service, so we may need to contact you by telephone number provided (landline or cellular), postal mail or if questions arise regarding your payment or inquiry initiated by you. FNCB, Inc. is a Debt Collector we follow to State and Federal Laws (Fair Debt Collection Practices Act or FDCPA) when communicating with debtors.

**Commitment to Privacy**

Your privacy is important to us, to protect your privacy we present this notice explaining FNCB, Inc.'s online information practices.

### **Commitment to Data Security**

FNCB, Inc. takes reasonable precautions to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

FNCB, Inc. takes reasonable precautions to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

FNCB, Inc. takes reasonable precautions with all of the information stored on our servers and web server logs are stored with restricted access and appropriate monitoring. FNCB, Inc. web servers have virus protection, intrusion detection software, and monitoring software that is regularly updated. However, in spite of these steps, FNCB, Inc. cannot guarantee that unauthorized persons or organizations will always be incapable of accessing our system by overcoming various security and protection measures in place.

### **Links to other websites**

Our website and services may contain links to other sites and services on the Internet. We do not review the content or terms of service of websites linked to the FNCB, Inc. website. We have no control over these external sites, we are not liable for their content, and we cannot validate their security, advertising, products, or other materials that may appear on or may be available on external sites.

### **The Right to Disclose**

FNCB, Inc. reserves the right to disclose different aspects of your personal information without your consent as listed below.

- In order to comply with Federal, State, or local laws, rules and other applicable legal requirements.
- In order to comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by Federal, State, or local authorities.
- In order to respond to judicial process or government regulatory authorities having jurisdiction for examination, compliance, other purposes as authorized by law.
- In order to verify the integrity of the payment information to our bank or payment processing provider.
- In order to disclose no more than what is required for accounting and invoicing purposes to our affiliated businesses.

### **Personal Responsibility about the Protection of your Information**

If you post or talk about FNCB, Inc. in forum, chat room, or social networking service, the personal information you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to submit in these instances.

If you give your name, phone number, address or email in a forum posting, that information becomes public information.

### **How and what kind of information is collected by FNCB, Inc. from visitors to our website?**

The FNCB, Inc. site is not set up to automatically collect personally identifiable information from each visitor. The FNCB, Inc. website tracks information about your visit and stores that information in our web server logs, these server logs maintain a record of all activities that occur on our site. This information is only for internal purposes to improve the user's access to our site and to protect our website and its content from inappropriate use. FNCB, Inc.'s web server does recognize the home server of visitors, but not e-mail addresses. For example, we can tell which Internet Service Provider visitors use, but not the names, addresses or other information about visitors that would allow us to identify a specific visitor. The information collected includes but is not limited to the browser the visitors' computer is using to access our site, date and time of a visit, the name of the visitors' internet services provider, the pages viewed by the visitor on our web site, visitor's unique internet protocol address.

### **Cookies**

Our web servers can send cookies to your web browser (major web browsers are Google Chrome, Mozilla Firefox, Internet Explorer, Opera, and Safari), cookies are small pieces of data sent to your browser. The small pieces of data are stored on your computer. Cookies cannot be used to acquire confidential or personal information about you that you have not already provided or be used to obtain information from your device.

The use of cookies is standard in web browsing. Most web browsers are defaulted to accept cookies. If you prefer not to accept cookies, you can set your web browser to refuse either to accept cookies or to notify you when you receive a cookie. If you decide not to accept cookies, some features of the FNCB, Inc. website may not function properly.

Your non-personal data collected by means of cookies or other analysis technologies.

A cookie is a small text file containing a unique identification number. The text file transfers from FNCB, Inc.'s website to the hard drive of your computer so our site administrator could identify your computer and passively track its activities on the website. A cookie will not allow us to gain knowledge of any personally identifiable information (example, a name and address) that you have not otherwise release.

### **User Supplied Information**

If you want to make a payment, we ask you to provide information that will enable FNCB, Inc. to verify whether you are entitled to access the payment portal. In completing payment information, the you will need to provide this information; your name, e-mail address, phone number, address, as well as other similar personal information that is needed to register or subscribe you to services or offers. The information provided in is stored on our server. The information collected is used FNCB, Inc. to determine your eligibility to access and use FNCB, Inc. payment portal. The information provided by you in subscription application is only accessible by our management team. We do not share this information with any non-affiliate outside parties.

**How does FNCB, Inc. obtain your personal information?**

FNCB, Inc. does not collect any personal information from our website from you unless you provide it to FNCB, Inc.

**Does FNCB, Inc. disclose Personal Information?**

FNCB, Inc. will not share the Personal Information we collect with any non-affiliate third parties. Personal information is information that is associated with your name or personal identity. The types of personal information you might provide to us may include name, address, phone number, e-mail address, etc.

FNCB, Inc. collects information when you make a payment. Making a payment to FNCB, Inc. constitutes your permission for the FNCB, Inc. to maintain the data in the United States. The data collected to maintain a record of those who have contacted us or made a payment. The data collected used for debt collection purposes.

**Cookies and Personal Information**

FNCB, Inc. does not use cookies to save personal information, user names, passwords, credit card numbers, or other highly confidential information.

**How do we use the information we collect?**

Any personally identifiable information you share with us by submitting an inquiry, request for information or payment is maintained and accessible by FNCB, Inc. management and authorized personnel. We may use the information to attempt to collect a debt.

**Payments**

By submitting a payment, you are giving FNCB, Inc. and our employee's permission to contact you at the telephone number provided (landline or cellular) and at the mailing address provided, apart from of any registration with state or national do not call lists associated with that telephone number. Contact methods could include telephone calls and mail.

If you are making a payment, logging into our web-based servers the server will populate the web pages called up with your information. The web page will access our data servers to obtain your user information including your name, address, and related data.

FNCB, Inc. has taken reasonable steps and has appropriate measures in place to protect personal information. This includes, but is not limited to, virus protection and security in place to prevent unauthorized access to the information stored and supplied on the FNCB, Inc. servers when a user logs into the system or visits the website.

Our web servers can send cookies to your web browser (major web browsers are Google Chrome, Mozilla Firefox, Internet Explorer, Opera, and Safari), cookies are small pieces of data sent to your browser to store and track information about you. The small pieces of data are stored on your computer.

The use of cookies is standard in web browsing. Most web browsers are defaulted to accept cookies. If you prefer not to accept cookies, you can set your web browser to refuse either to accept cookies or to notify you when you receive a cookie. If you decide not to accept cookies, some features of the FNCB, Inc. website may not function properly.

#### **Who has access to the personal information collected on FNCB, Inc. website?**

The information collected by our site is only accessible by members of our management team. We do not sell, rent or lease mailing lists of our customers or data to any non-affiliate third parties.

You acknowledge and accept, by providing your cellular telephone number because of a debt inquiry, information request or making a payment to FNCB, Inc., that voice, data and messaging rates may apply from your cellular carrier if FNCB, Inc. uses that cellular number provided by you to contact you.

FNCB, Inc. may transfer across State borders, non-personal information that is collected and personal data given to for the purposes of data consolidation, storage, and simplified customer information management. FNCB, Inc. does not store information outside of the United States.

#### **Privacy Policy Updates**

Changes in rules, regulations, laws, and business procedures may make it necessary to amend our Privacy Policy. If this occurs, FNCB, Inc. will post the new policy on our Web site. Once posted, the new policy will go into effect and will replace any previously stated policy. Please note any changes in the laws, regulations addressing our Privacy Policy are not retroactively applied.

#### **How to Contact FNCB, Inc.**

If you have any questions regarding our Privacy Policy, here is how to contact us.

Toll Free Number: 800 824-6191

Monday-Friday, 6:00 am-5:00 pm (Pacific Time, excluding holidays)

Mailing Address:

First National Collection Bureau, Inc.

50 West Liberty Street, Suite 250

Reno, Nevada 89501

Please Note: To safeguard against interference by unauthorized individuals, FNCB, Inc. will not respond to e-mail requests concerning accounts placed for collection or to review or request changes to personally identifiable information collected by FNCB, Inc.

If you want to contact FNCB, Inc. about a debt placed with FNCB, Inc. for collection. Please use the U.S. Postal Service for all correspondence regarding that account. It must include your name, your mailing address, the FNCB account number, creditor name, and creditor account number.

Without complete information, FNCFB, Inc. will be unable to respond to your request, until we have complete information.

Mailing Address:

First National Collection Bureau, Inc.  
50 West Liberty Street, Suite 250  
Reno, Nevada 89501

If you want to contact FNCFB, Inc. about to review or request changes to personally identifiable information collected by FNCFB, Inc. Please use the U.S. Postal Service for all correspondence regarding that account. It must include your name, your mailing address, the FNCFB account number, creditor name, and creditor account number. Without complete information, FNCFB, Inc. will be unable to respond to your request, until we have complete information.

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## **CALIFORNIA RESIDENTS: PRIVACY POLICY NOTICE**

This Privacy Policy Notice is intended for California residents pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), and supplements the information contained in the above Privacy Policy. Any terms defined in the CCPA and applicable California Attorney General regulations have the same meaning as used in this Privacy Policy Notice.

### **1. Information We Collect About You**

We may collect and use personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be directly or indirectly linked, with a consumer, device, or household (“personal information”).

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as (but not limited to) information governed by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the California Confidentiality of Medical Information Act (“CMIA”), the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), California Financial Information Privacy Act (“FIPA”), and the Driver’s Privacy Protection Act of 1994 (“DPPA”).

We regularly collect (and have collected in the past 12 months) several types of personal information about individuals offline regarding accounts we service, including: name, DOB, address, gender, account number, payment and other financial information, email address, insurance information, SSN, employment information, telephone number, IP address, military or veteran status, audio information, username, publicly available information, and information collected or shared pursuant to HIPAA, FIPA, GLBA, FCRA, DPPA, and/or other applicable privacy laws. We also may collect additional categories of personal information users provide directly to us or our service providers.

## **2. How Your Personal Information is Collected**

We collect most of this personal information from sellers of accounts receivable or from you or your authorized representative by telephone or written communications. However, we may also collect information:

- From publicly accessible sources (e.g., property or other government records);
- From our service providers (e.g., call analytics, information source, skip-tracing, payment processing, mailing, and other vendors)

## **3. Why We Use or Disclose Your Personal Information**

We regularly use or disclose personal information for one or more of the following business purposes:

- Fulfill the reason you provided the information. For example, if you share your personal information to make a payment, we will use that information to process your payment.
- Perform services on behalf of a business or service provider, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing analytic services, or providing similar services on behalf of the business or service provider
- Provide you with information or services that you request from us
- Auditing related to consumer interactions
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use, where the personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction
- Undertaking activities to verify or maintain the quality of a service or device that is owned, made by or for, or controlled by us, and to improve,

upgrade, or enhance the service or device that is owned, made by or for, or controlled by us

- Respond to law enforcement requests and as required by applicable law or court order
- As appropriate to protect the rights, property, or safety of us, our clients, or others
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different purposes without providing you notice.

We regularly disclose (and have disclosed in the past 12 months) several types of personal information about individuals for one or more business purposes, including: name, DOB, address, gender, account number, previous payment and other financial information, email address, insurance information, SSN, employment information, telephone number, IP address, military or veteran status, audio information, username, and information collected or shared pursuant to HIPAA, FIPA, GLBA, FCRA, DPPA, and/or other applicable privacy laws. We have not sold your personal information over the last 12 months and will not sell your personal information under the CCPA.

#### **4. Verifiable Consumer Requests for Information**

Upon verification of identity, California residents may in some cases request that a business:

- Disclose the categories of personal information the business collected about the consumer;
- Disclose the categories of sources from which the personal information is collected
- Disclose the categories of personal information that the business sold about the consumer;
- Disclose the categories of personal information that the business disclosed about the consumer for a business purpose;
- Disclose the categories of third parties with whom the business shares personal information
- Disclose specific pieces of personal information the business has collected about the consumer
- Disclose any financial incentives offered by the business for collection, sale, or deletion of personal information

A business may charge a different price or rate, or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to you by your personal information.

For applicable personal information access and portability requests, we will select a



format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Please note that we are not required to:

- Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
- Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information;
- Provide the requested information disclosure to you more than twice in a 12-month period.
- Provide the requested information disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf; or
- Provide the requested information disclosure if a CCPA or applicable exception applies.

## **5. Right to Request Deletion of Personal Information**

Upon verification of identity, California residents may in some cases request that we delete personal information about you that we collected from you and retained, subject to certain exceptions.

We may deny your deletion request if we are acting in the role of a service provider to another business regarding the applicable personal information. If we deny your request on that basis, we will generally refer you to the relevant business. In addition, we may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- 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 our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent.

- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information; or
- If another CCPA or applicable exception applies.

California residents may submit verifiable requests for information or deletion described herein by emailing us at [ccparequest@fncbinc.com](mailto:ccparequest@fncbinc.com) / or calling us at (800) 824-6191

## 6. Verifying Your Identity If You Submit CCPA Requests

If you choose to contact us directly via the designated methods described above to exercise your CCPA rights, you will need to:

- Provide enough information to reasonably identify you [(e.g., your full name, account number if applicable, and potentially other identifying information)]; and
- Describe your request with sufficient detail to allow us to properly process and respond to your request.

We are not obligated to make an information disclosure or carry out a deletion request pursuant to the CCPA if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you in order to verify your identity in connection with your CCPA request will be used solely for the purposes of verification.

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