

Privacy Policy

FDCPA Disclosure: Nothing in this privacy policy shall permit the disclosure of information to third parties in violation of the Fair Debt Collection Practices Act.

We value your privacy at NCB Management Services Incorporated (hereinafter “We”) and maintain standards to secure your private information. This privacy notice discloses the privacy practices for this website. This privacy notice applies solely to information collected by this web site. It will notify you of the following:

- What personally identifiable information is collected from you through the web site, how it is used and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information.
- Your use of this website and any personal information you provide via the website remains subject to this Privacy Policy. We follow all applicable federal and state law regarding information sharing and will not violate any consumer protection laws including the Fair Debt Collection Practices Act.

BY VISITING THIS WEBSITE, YOU AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT PROVIDE ANY INFORMATION OR USE ANY OF THE SERVICES PROVIDED ON ANY OF THE WEBSITES REFERRED TO IN THIS PRIVACY POLICY. PLEASE NOTE: THIS PRIVACY POLICY CHANGES FROM TIME TO TIME AND CHANGES ARE EFFECTIVE UPON POSTING. PLEASE CHECK BACK FREQUENTLY FOR UPDATES AS IT IS YOUR SOLE RESPONSIBILITY TO BE AWARE OF CHANGES. WE DO NOT PROVIDE NOTICES OF CHANGES IN ANY MANNER OTHER THAN BY POSTING THE CHANGES AT NCB MANAGEMENT SERVICES INCORPORATED.

Information Collection, Use, and Sharing

We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request.

Unless you ask us not to, we may contact you via email in the future to communicate regarding your account(s) with our office or changes to this privacy policy.

The following paragraphs in this Section describes how we currently use Personal Information, but we may change or broaden our use at any time. As noted in this Privacy Policy, we may update this policy from time to time. We use your Personal Information for the following general purposes:

- **Customer Service:** We use your Personal Information to improve our services to customers.
- **Complying with Legal Process:** We will use or disclose your Personal Information in response to subpoenas, court orders, warrants, or legal process, or to otherwise establish or exercise our legal rights or defend against legal claims or in the event you violate or breach an agreement with us.
- **Contacting You:** By using our website, you consent to contact from us or a third party affiliate with whom we share information in accordance with this Privacy Policy, to contact you by phone or email regarding your account status and changes to subscriber agreements, privacy policy, or any other policies or agreements relevant to you.

We store Personal Information in a database on computers or servers owned or accessed by us. These computers and servers have security measures (such as a firewall) in place to protect against the loss, misuse, and alteration of the information under our control. Data transmitted through our website, including Personal Information you submit, is protected using 1024-bit encrypted Secure Socket Layer (SSL) technology to make your connection to our server completely confidential. SSL technology ensures that only you, our company and our third party affiliates as permitted under this Privacy Policy can access the information you submit. The data you provide is immediately translated into code, and can only be decoded by us. SSL confirms the identity of the originating computer terminal and the recipient terminal, preventing unauthorized interception. Notwithstanding such measures, we cannot guarantee that its security measures will prevent its computers from being illegally accessed, and your Personal Information from being stolen or altered. If you feel that we are not abiding by this privacy policy, you should contact us immediately via telephone at 1-800-828-1110.

- **Cookies, Web Beacons, and Other Info Collected Using Technology:** We currently uses cookie and web beacon technology to associate certain Internet-related information about you with information about you in our database. Additionally, we may use other new and evolving sources of information in the future.

Cookies

“Cookies” are a feature on your browser software. If enabled, we may write cookies that may store small amounts of data on your computer about your visit to any of the pages of this website. Cookies assist us in tracking which of our features appeal the most to you and what content you may have viewed on past visits. When you visit this site again, cookies can enable us to customize our content according to your preferences. We may use cookies to: keep track of the number of return visits to this site; accumulate and report aggregate, statistical information on website usage; deliver specific content to you based on your interests or past viewing history; save your password for ease of access to our website. You can disable cookies, although our website may not function properly for you. Your browser preferences can be modified to accept or reject all cookies, or request a notification when a cookie is set.

IP Addresses

We automatically track certain information based upon your behavior on the site. We may use this information to do internal research on our users’ demographics to better understand, protect and serve you. This information may include the URL that you just came from (whether this URL is on the site or not), which URL you next go to (whether this URL is on the site or not), your computer browser information, and your IP address. Your Internet Protocol (“IP”) is a unique Internet “address” which is assigned to you by your Internet Service Provider (“ISP”). For local area network (“LAN”), DSL, or cable modem users, an IP address may be permanently assigned to a particular computer. IP addresses are automatically logged by web servers, collecting information about a user’s traffic patterns. While the IP address does not identify an individual by name, it may, with the cooperation of the ISP, be used to locate and identify an individual using the web. Your IP address can, however, reveal what geographic area you are connecting from, or which ISP you are using. Finally, other websites you visit have IP addresses, and we may collect the IP addresses of those websites and their pages.

Do Not Track Requests

We do not track visitors over time and across third party websites to provide targeted advertising and therefore do not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser allows you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked. Third parties cannot collect any other personally identifiable information from our websites unless you provide it to them directly.

No Information Collected from Children

We will never knowingly collect any Personal Information about children under the age of 13. If we obtain actual knowledge that we have collected Personal Information about a child under the age of 13, that information will be immediately deleted from our database. Because we do not collect such information, we have no such information to use or to disclose to third parties. We have designed this policy in order to comply with the Children’s Online Privacy Protection Act (“COPPA”).

Affiliations/Merger/Sale

If we change ownership through an acquisition, merger, sale or other change of business status, we reserve the right to transfer or assign the right to use your Personal Information collected from our websites.

Making Corrections

We are committed to accurately maintaining your personally identifiable information. We will take reasonable steps to correct personal information that is properly identified as incorrect. If you need to update or correct your personal information, contact via telephone at 1-800-828-1110, via e-mail at info@ncbi.com or via US Mail at 1 Allied Drive, Feasterville-Treose, PA 19053. Please understand that, in some circumstances, only your service provider may have the authority to update or correct your personal information. If this information is the type that only your service provider can update or correct, we’ll forward your request to your service provider.

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 and never in contradiction of the Fair Debt Collection Practices Act.

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 via telephone at 1-800-828-1110, via e-mail at info@ncbi.com or via US Mail at 1 Allied Drive, Feasterville-Trevoze, PA 19053.

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.

Last modified: January 7, 2020