

**Vital Solutions, Inc.**  
**Consumer Privacy & Identity Theft Policy**

**Our Consumer Privacy Commitment**

Vital Solutions, Inc. (“Vital”) and its wholly-owned subsidiaries: Vital Recovery Services, Inc. and Vital Outsourcing Services, Inc.; are committed to respecting and protecting consumer privacy. We value consumer trust and want consumers to understand how we protect, collect, use and disclose the personal information consumers share with us.

This privacy statement applies to personal information we obtain anytime a consumer interacts with Vital such as when a consumer visits our websites or contacts Vital’s call centers. We want to ensure consumers are aware of our practices for collecting and processing personal information, which is information about a person that can be used to identify that person.

**What we collect**

We collect personal information to provide Account Receivables Management (“ARM”) services, and administer our business. The type of personal information we collect depends on the ARM services requested but may include contact information such as name, address, telephone number or e-mail address, financial information including bank account information, or credit card information, other identifying information such as social security number or date of birth, and such other information we may collect with consumer consent or as permitted or required by law.

Generally, we obtain personal information from the following sources:

- Information we get from a consumer or is given to us on a consumer's behalf by telephone and at our website to make payments and request ARM services.
- Information we may get from reputable reference sources and clearing-house services for purposes of verification and risk management.

**How we use it**

We use personal information in a number of ways such as to better understand and manage our client’s ongoing relationship with a consumer, to assure good ARM, to prevent fraud and abuse and otherwise with consent or as permitted or required by law. Vital may store personal information on databases for the purposes of the administration of our business, including our client’s ongoing relationship with a consumer. As permitted by applicable law, we may merge personal information with public information or other information received from reputable vendors to update contact information or to enhance demographic profiles.

**Who we share it with**

Vital will not sell, rent, or lease a consumer’s personal information. We may disclose all of the information, as described above, to our associates and clients in connection with ARM services Vital performs for, or with, these parties for the uses described in “how we use it” and for other purposes as permitted or required by law. Disclosures permitted or required by law may include cooperation with criminal or government investigations, fraud and identity theft prevention and detection, and responses to a court order or subpoena. Vital’s associates are bound by appropriate confidentiality agreements.

Vital may disclose some or all of the personal information to information services providers for the purposes of performing business support functions on our behalf. Our agreements with these service providers contain confidentiality provisions and restrictions on using this information for any other purposes. Vital does not report consumer personal information to credit bureaus.

If Vital becomes involved in a merger, acquisition or any form of sale of some or all its assets, we may disclose personal information to third parties in connection with the evaluation of the transaction. The surviving company would have access to personal information which would continue to be subject to this privacy statement.

### **Accuracy & Access**

Vital is committed to ensuring that the information we obtain and use about a consumer is accurate for its intended purpose. We will provide ways to give consumers reasonable access to consumer information in our database to review, update, or correct as applicable. Consumers can request access to consumer personal information or help us maintain accurate records by informing us of changes or modifications to consumer personal information using one of the methods listed under "Contacting Vital".

To protect consumer privacy and security, we will also take reasonable steps to verify a consumer's identity before granting to a consumer access or enabling consumers to make corrections. Vital will retain personal information we have collected only for the time period needed for business purposes or as required by the corresponding regulatory authorities, and we will ensure secure destruction thereafter.

### **Data Security**

Vital utilizes physical, electronic and procedural security measures to protect against loss, misuse, and alteration of information under our control. Vital offers industry-standard practices and security measures to safeguard and secure the personal information we collect.

Access to personal information is restricted to employees and service providers who need to have access to that information as described in this privacy statement. Vital requires its service providers to observe standards with respect to the security, collection, use and sharing of personal information, and to comply with applicable law.

### **Preventing Identity Theft**

Vital is dedicated to protecting your personal information. We will never initiate a request for personal information from you by fax or email. Please do not send confidential personal information such as social security numbers, government identification numbers, or account numbers to Vital via an unsecured email message. Send confidential information to Vital via posted mail or phone.

Do not be misled by emails that appear to be from Vital and ask for personal information. If you receive a suspicious email requesting your personal information, please forward the email immediately to [spooof@VitalSolutions.net](mailto:spooof@VitalSolutions.net).

### **Contacting Vital**

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