



## CINgroup Privacy Policy

Please carefully read this privacy policy statement in order to understand how we will treat the personal information you provide while obtaining products or services from CIN.

You are receiving notice of this Privacy Policy because you are either a Consumer or Customer of Credit Infonet, Inc. dba CINgroup, CIN Legal Data Services, myHorizon®, and/or [www.myhorizontoday.com](http://www.myhorizontoday.com) ("CIN"). If you are visiting one of CINgroup's Web sites, [www.cingroup.com](http://www.cingroup.com), [www.cinlegal.com](http://www.cinlegal.com), [www.cincompass.com](http://www.cincompass.com), or [www.myhorizontoday.com](http://www.myhorizontoday.com) ("CIN Sites") as a business entity; or as an individual who either does not have an account or relationship with CIN or is using CIN products and services solely for business purposes; this notice does not apply to you.

Safeguarding the privacy of non-public personally identifiable information we receive is a top priority for CIN. Please be aware that the CIN Sites are not intended for children and CIN does not knowingly collect any information about children. CIN defines a child as any individual under the age of eighteen (18).

### 1. DEFINITIONS

**"Affiliates"** mean companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include nonfinancial companies such as Best Case Bankruptcy, LLC and Second Bankruptcy Course, LLC.

**"Consumer"** means an individual who is accessing CIN products and/or services solely for the Consumer's own personal, family or household purposes.

**"Customer"** means a Consumer who has a continuing relationship with CIN by virtue of activating an account at a CIN Site and/or ordering or using a product or service through the CIN Sites.

**"Former Customer"** means a Customer who no longer has an active account at a CIN Site. We share the NPI collected from Former Customers in accordance with the terms stated in this Policy.

**"Joint marketing"** means a formal agreement between nonaffiliated financial companies that together market financial products or services to Customers or Consumers.

**"Nonaffiliates"** means companies not related by common ownership or control. Nonaffiliates may be either financial service providers such as the national credit bureaus, or non-financial companies such as bankruptcy forms preparation software vendors and non-profit organizations approved by the U.S. Dept. of Justice to administer the consumer credit counseling courses required under current bankruptcy law.

### 2. WHO WE ARE

CIN is the leading provider of information services, due diligence products, and practice management solutions to the consumer law industry. CIN is also a reseller of consumer credit data maintained by the national credit bureaus. CIN offers Consumers and Customers a comprehensive portfolio of innovative products, services and tools that assist in the accurate, efficient, and cost-effective preparation of consumer law cases.

●CIN is by definition a consumer reporting agency (CRA) operating in accordance with the requirements of the federal Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq. The FCRA establishes the following principles for all CRAs:

- **Privacy:** A CRA may furnish information from your personal credit profile to a Third Party only if 1) that Third Party has a permissible purpose to receive such information, and 2) you have given the CRA "written instructions" authorizing the CRA under Section 604(a)(2) of the Fair Credit Reporting Act (15 U.S.C. §1681 et. seq.) to obtain your personal credit profile from one or more of the national credit bureaus and provide it to the Third Party.
- **Access:** Consumers may receive a copy of information a CRA maintains about them. Such reports can be obtained free of charge once per year or for a reasonable fee for additional disclosures. Please visit the following website to obtain more information: [www.annualcreditreport.com](http://www.annualcreditreport.com).

- **Accuracy:** CRAs must follow reasonable procedures to assure accuracy of the information they maintain and furnish. When you obtain a copy of your information, you have a right to dispute and have the information reinvestigated and corrected in the CRA's database.
- **Fairness:** CRAs obtain their information from various sources including public records and direct reports from creditors. The FCRA establishes time frames for how long a CRA can report certain types of negative credit data and activity.
- **Accountability:** The Consumer Financial Protection Bureau is charged with overseeing the operations of CRAs and enforcing FCRA requirements.

### 3. TYPES OF PERSONAL INFORMATION WE COLLECT

● **Web Site Analytics:** Our Web servers automatically collect the domain names, not the e-mail addresses, of visitors to the Sites. CIN uses this information to measure the use of our Sites, the number of visits, the average time spent on the Sites, the pages viewed per visit, and similar information, with the goal of developing ideas to improve the content and flow of our Sites.

● **Nonpublic Personal Information ("NPI"):** When a Consumer or Customer orders, retrieves, or uses CIN products or services; provides us with account information; shows a driver's license or gives us contact information; or uses a credit or debit card to make a purchase from us; we may collect the following types of NPI:

- Information we receive from Consumers and Customers on applications, forms, electronic templates, and in other communications to us, whether in writing, in person, by telephone, by Internet connection, or any other means;
- Information we obtain from Consumers' and Customers' activities on our Sites through the use of electronic technologies such as cookies;
- Information Consumers and Customers give to us when they make purchases;
- Information about Consumers' and Customers' transactions with us, our affiliated companies, or others;
- Information we receive from a consumer reporting agency and other data and information providers.
- Data provided by Consumers and Customers such as their names, addresses, telephone numbers, SSNs, and dates of birth;
- Consumers' and Customers' account data such as account numbers, balances, and payment history;
- Consumers' and Customers' credit data including credit history as provided by CRAs;
- Verifying data necessary to authenticate Consumers' and Customers' identities;
- Data on purchases made through CIN and its affiliates; and
- Anonymous and aggregated data about Consumers' and Customers' use of the Sites and products, including but not limited to Site navigation and types of Site functionality used.

● **Other Personal Information:** CIN also collects your personal information from others, such as credit bureaus, affiliates, or other companies.

### 4. HOW WE SAFEGUARD NPI

● We use our best efforts to ensure that no unauthorized parties have access to any Consumer's or Customer's NPI. Whenever a consumer credit product or due diligence product is ordered for a Consumer or Customer, we utilize the latest Internet technology to authenticate the Consumer's or Customer's identity and to obtain the Consumer's or Customer's legitimate authorization and written instructions for the transaction. We train and oversee our employees and agents to help ensure that NPI will be handled responsibly and in accordance with this Privacy Policy and CIN's guidelines.

● To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We use physical, electronic, and procedural safeguards to protect the privacy of data stored within our network, including the following: 128 bit SSL Encryption; Secure User Names & Passwords to authenticate users accessing the system; a TrueSecure Certified Firewall; and tracking of Consumer and Customer IP addresses to detect and diagnose problems and potential system abuse. In addition, CIN does not use IP addresses to identify Consumers

or Customers; link IP addresses to Consumer or Customer account or access information; or authorize the scanning of its network systems or attempted penetration testing of any degree without the written consent of management.

●Neither CIN nor our affiliates will ever send any Consumers or Customers a request via e-mail for any personally identifiable information (e.g., social security number, account number, date of birth, etc.). If you receive an e-mail appearing to come from CIN or one of its affiliates asking for personally identifiable information, please contact our Customer Support Department at 1-866-218-1003 or [contact@cingroup.com](mailto:contact@cingroup.com) so that we can take the proper action to protect you.

## 5. REASONS WE CAN SHARE YOUR PERSONAL INFORMATION

●CIN shares your personal information for the following reasons:

- For our everyday business purposes, such as to process your transactions; maintain your account(s); conduct our core businesses; develop, enhance, position, and market our core products and services; respond to court orders and legal investigations; or report to credit bureaus. You cannot limit this sharing.
- For our marketing purposes, to offer our products and services to you. You can limit this sharing.
- For joint marketing with other financial companies. You can limit this sharing.
- For our affiliates' everyday business purposes, information about your transactions and experiences. You cannot limit this sharing.
- For our affiliates to market to you. You can limit this sharing.
- For nonaffiliates to market to you. You can limit this sharing.

●Please note, CIN does not share information about your creditworthiness with any entity, affiliate or nonaffiliated.

●When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

## 6. HOW TO LIMIT OUR SHARING

●If you would like to limit our sharing of your personal information, you should visit us online at <https://account.myhorizontoday.com> and navigate to "My Accounts". In the alternative, you may contact us by calling 866-218-1003, emailing [consumer@cingroup.com](mailto:consumer@cingroup.com), or writing to CINgroup, ATTN: Opt-Out, 4540 Honeywell Court, Dayton, OH 45424.

If you are either 1) an existing customer receiving notice of a *revised* privacy policy, or 2) a new customer receiving notice of our privacy policy for the *first time*, meaning you did not acknowledge it and have the opportunity to opt out when you completed an electronic transaction on one of our web sites, we can begin sharing your information **30 days** from the date we send you notice of or post notice of our privacy policy.

## 7. CONTACTS FOR CHANGES AND ADDITIONAL INFORMATION

●To update or correct information you have provided us, you can do so by emailing us at [contact@cingroup.com](mailto:contact@cingroup.com) or calling us at 1-866-218-1003

●For additional information about privacy or consumer reporting, visit the following Web sites:

Consumer Financial Protection Bureau: [www.cfpb.org](http://www.cfpb.org)

TransUnion: [www.transunion.com/corporate/personal/personal.page](http://www.transunion.com/corporate/personal/personal.page)

Consumer Data Industry Association: [www.cdiaonline.org](http://www.cdiaonline.org)

Experian: [www.experian.com/consumer/credit\\_education.html](http://www.experian.com/consumer/credit_education.html)

Federal Trade Commission: [www.ftc.gov](http://www.ftc.gov)

Equifax: [www.econsumer.equifax.com](http://www.econsumer.equifax.com)