



CONSUMER PRIVACY POLICY OF Elite Document Management Solutions (“EDMS”)

Our services are intended for a U.S. Audience. If you visit our website or use our services, your information will be transferred or processed in the United States. Our online services are not intended for children under 18. We do not knowingly collect personal information from children under 18 without parental consent.

| What does EDMS do with your personal information? | |
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| Why? | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and income • Banking information and transaction history • credit history and payment history <p>In addition to personal information, we may capture the IP address of the device you use to interact with us online, and use tracking cookies to collect and store other information about your online interaction. We may also collect information about you from additional online and offline sources including from partner sites or commercially available third-party sources, such as credit reporting agencies.</p> |
| How? | All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons we share your personal information; when we may share your personal information; and whether you can limit this sharing. |

| Reasons we can share your personal information | Do we share your personal information? | Can you limit this sharing? |
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| For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes. We occasionally share your info with necessary parties, such as your creditors or debt collectors or credit reporting services, to provide the products or services you have contracted for. | No. In order to receive our services we occasionally must be able to share your information with necessary parties. |
| For our marketing purposes - to offer our products and services to you | Yes. We occasionally share your info with vendors that assist us in offering various opportunities to you. | No. Although, federal law does not require it, you may opt out of receiving marketing from us for all services other than that which you contracted for. |
| For joint marketing with other financial companies | No | No |



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| For our affiliates' everyday business purposes - information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes - information about your creditworthiness | Yes. We share your information with affiliated parties to provide the products and services you have contracted for. | Yes. You may opt out of this but opting out may interfere with the delivery of the products and services you have contracted for if they require this information. |
| For our affiliates to market to you | Yes | Yes. |
| For our nonaffiliates to market to you | No. We do not share your information with non-affiliates. | Not applicable |

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| To limit our sharing | <i>Call us at 1-800-560-1774</i> Please note if you are a new customer, we can begin sharing your information after five (5) days from the date we provided this notice to you. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at the telephone number above at any time to limit our sharing. 4203 Genesee Ave Suite 406, San Diego, Ca 92117 |
| Questions? | <i>Call us at 1-800-560-1774</i> for any questions you have about the way we handle your information. |

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| Who we are | |
| Who is providing this notice. | Elite Document Management Solutions and its family of companies. Our affiliates include: SmartCredit.com |

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| What we do | |
| How does EDMS protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures, including computer safeguards, encrypted storage of all personal information, data security and data breach protocols and secured files and buildings. All of our employees are trained and monitored on privacy and security protocols, and only those employees whose functions require that they have access to personal information are allowed to have such access. We monitor our offices with cameras, and protect them with |



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| | monitored alarm systems. We destroy all physical documents after they are no longer required for a business purpose, and we keep any electronic copies of documents in a secure encrypted environment. |
| How does EDMS Collect my personal information? | We collect your personal information from any and all interactions that you have on our websites, our portals, email communications, telephonic communications, mail communications and face-to-face interactions with you. We also collect your personal information from others, such as affiliates, credit bureaus, or other companies. |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes – information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law. Some sharing of your information is required for us to be able to provide you with the products and services under this Agreement. Although federal law does not require us to, we give you the right to limit any sharing that is not directly needed to facilitate the delivery of our contracted products and services.</p> |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account. |

| Definitions | |
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| Affiliates | Companies related by common ownership or control. They can be financial and non-financial companies. |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and non-financial companies. |
| Joint Marketing | A formal Agreement between non-affiliated financial companies that together market financial products or services to you. |

Information for Vermont, California and Nevada Residents:

VERMONT: Accounts with a Vermont mailing address are automatically treated as if they requested us not to share their information with nonaffiliated third parties, and we limit the information we share with any affiliates. If we disclose information about you to nonaffiliated third parties with whom we have joint marketing agreements,



we will only disclose your name, address, other contact information, and information about our transaction and experiences with you.

NEVADA: We are providing you this notice pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our internal Do Not Call List by contacting us at 1-800-560-1774, or by writing to us at **NEVADA ANNUAL NOTICE, EDMS**, 4203 Genesee Ave Suite 406, San Diego, Ca 92117. For more information, contact us at the address or phone number above. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: 702-486-3132; e-mail: BCPINFO@ag.state.nv.us.

CALIFORNIA: In response to a California law, we will automatically treat individuals with a California billing addresses as if they had requested us not to share their information with nonaffiliated third parties except as permitted by the applicable California law. We will also limit the sharing of information about you with our affiliates to comply with California privacy laws that apply to us. We do not honor any "Do Not Track" signals that are provided by a user's browsers.

However, we do not collect or authorize the collection by any third party of any nonpublic personally identifiable information about an individual consumer's online activities over time and across different Web sites or online services. As stated above, we do not share any personal information with any third parties for any direct marketing uses by those parties, other than on our behalf. See California Consumer Privacy Notice.

Changes to our privacy policy

In the event we change this privacy policy, we will forward an email notification to all clients that have provided us with and maintain a current email address. In addition, we will post any such changes on this page so that you will always be aware of what information we collect, how we use it, and under what circumstances we disclose it.

Your consent

By using this site and/or entering into our Client Agreement, you consent to the collection and use of the information as described in this Privacy Policy.

Privacy Policy Update: July 30, 2018

California Consumer Privacy Notice

IMPORTANT PRIVACY CHOICES FOR CONSUMERS

You have the right to control whether we share some of your personal information. Please read the following information carefully before you make your choices below.



We are required by the California Financial Information Privacy Act to provide this notice to you annually. We will also send you an additional notice each year that tells you about your privacy rights under federal law. This Privacy Notice applies to the Elite Document Management Solutions and its affiliates.

YOUR RIGHTS

You have the following rights to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service. This includes sending you information about some other products or services.

YOUR CHOICES

Restrict Information Sharing With Companies We Own or Control (Affiliates): Unless you say "No," we may share personal and financial information about you with our affiliated companies.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say "No," we may share personal and financial information about you with outside companies we contract with to provide financial products and services. EDMS does not provide nonaffiliated third parties with your personal information.

Request information regarding the disclosure of your personal information. If you are a resident of California, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by EDMS or its subsidiaries to a third party for the third party's direct marketing purposes. This right granted to California residents applies only to their activities within the State of California. At this time, EDMS does not share your personal information to nonaffiliated third parties for direct marketing purposes.

TIME SENSITIVE REPLY

You may make your privacy choice(s) at any time. Your choice(s) will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

To exercise your choices **call us at 1-800-560-1774** – and let our agent know you are a California resident and have a privacy concern.

Please note that in order for us to process your request, the address you provide must be a California address you've given to us in relation to your account

Privacy Policy Update: July 30, 2018