

## NOTICE OF YOUR FINANCIAL PRIVACY RIGHTS

Rev. 1/2020

### FACTS

#### WHAT DOES CHECKMATE DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ Checking account information and payment history</li> <li>▪ Credit history and transaction or loss history</li> </ul> When you are <i>no longer</i> a customer, we continue to share information as provided in this notice.
<b>How?</b>	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Checkmate chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Checkmate share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> To offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> Information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> Information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For our nonaffiliates to market to you</b>	No	We don't share

<b>Questions?</b>	Call 1-866-722-2274 or go to <a href="http://www.callcheckmate.com">www.callcheckmate.com</a>
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Who we are	
Who is providing this notice?	Pacific Rim Alliance Corporation and all affiliates doing business under the name Checkmate, as described below.
What we do	
<b>How does Checkmate protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Checkmate collect my personal information?</b>	<p>We collect your personal information, for example when you</p> <ul style="list-style-type: none"> <li>▪ apply for a loan or give us your income information</li> <li>▪ provide employment information or give us your employment history</li> <li>▪ give us your contact information</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes— information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Checkmate does not share with our affiliates.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Checkmate does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners include financial companies such as credit and debit card companies.</i></li> </ul>

## CALIFORNIA DISCLOSURES AND PRIVACY POLICY

The state of California requires that we provide privacy information for individuals that reside in California. If you do not reside in California, you can skip this document.

For California residents, here is a summary of what you will learn from these California disclosures and privacy policy:

1. Personal Information We Collect
  - 1.1. What personal information does not include
  - 1.2. How we obtain your personal information
  - 1.3. How we may use your personal information
  - 1.4. How we may share your personal information
  - 1.5. Your personal information in the last 12 months
  - 1.6. Sale of personal information
2. Your rights under the California Consumer Privacy Act of 2018
  - 2.1. Your right to request what information has been collected and how it has been used (“Right to Know”)
  - 2.2. Your right to request deletion of your personal information (“Right to Delete”)
  - 2.3. Right to opt-out of the sale of your personal information (“Right to Opt-Out”)
  - 2.4. Right to not be discriminated against for exercising your rights under the California Consumer Privacy Act (“Right to Non-Discrimination”)
3. Submitting a verified consumer request to know or to delete
  - 3.1. Exercising your Right to Know, data portability, and Right to Delete
  - 3.2. Authorized agents
  - 3.3. Response timing and delivery method
4. Changes to our California disclosures and privacy policy
5. How to contact us

### **Below is the legal information we are required to share:**

These CALIFORNIA DISCLOSURES AND PRIVACY POLICY govern the information collected, used, and shared by Pacific Rim Alliance Corporation, Checkmate Express Corporation, Checkmania, Inc., Virtual E, Inc., Money Lender, Inc., Checkmate of Colorado, Inc. (collectively, “we,” “us,” or “our”) and the associated site [www.callcheckmate.com](http://www.callcheckmate.com) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this policy.

### **1. PERSONAL INFORMATION WE COLLECT**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual consumer or device (“personal information”).

#### **1.1. Personal information does not include:**

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA, like:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

**1.2. How We Obtain Your Personal Information:**

Directly from you.	You enter or provide us with information, whether online or by email, phone, or document upload.  For example, when you apply for a loan, make a wire transfer, cash a check, show us your government issued ID, or pay your bills.
Directly and indirectly from you based on activity on our website.	For example, from submissions through our website or website usage details collected automatically.
From vendors or third-parties that interact with us in connection with the services we perform.	For example, credit reporting agencies, banking institutions or other vendors that provide data we use in underwriting or that assist us in verifying your identity and information you provide to us or in protecting you and our products from fraud and identity theft.

**1.3. How We Use Your Personal Information:**

We may use or disclose the personal information we collect for one or more of the following business purposes:

1. Performing services on behalf of us or our service provider, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of us or our service providers. This includes:
  - a. to fulfill or meet the reason for which the information is provided;
  - b. to provide you with information, products, or services that you request from us;
  - c. to provide you with email alerts and other notices concerning our products or services, or events or news, that may be of interest to you; and
  - d. to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
2. Undertaking internal research for technological development and demonstration
3. Debugging to identify and repair errors that impair existing intended functionality
4. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
5. Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
6. Short-term, transient use, provided 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, including, but not limited to, the contextual customization of ads shown as part of the same interaction

7. Undertaking activities to verify or maintain the quality or safety of device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

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

**1.4. Who We Share Your Personal Information with for a Business or Commercial Purpose:**

We may disclose your personal information to a service provider or third party for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the service provider to both keep that personal information confidential and not use it for any purpose except performing the contract. Examples of who we share with include:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

**1.5. Within the last 12 months we collected the categories of personal information listed below and shared it as follows:**

CATEGORY	EXAMPLES	COLLECTED (Yes/No)	SOURCES OF COLLECTED PERSONAL INFORMATION (See Section 1.2 above)	BUSINESS OR COMMERCIAL PURPOSE FOR SHARING (Section 1.3 #1-7, above)	CATEGORY OF THIRD PARTIES (See Section 1.4 above)
<b>A. Identifiers.</b>	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	You, Your activity on our site, or from vendors and third-parties	1-7	Our affiliates, service providers and third-parties
<b>B. Personal information</b>	A name, signature, Social Security number, physical characteristics or description,	YES	You, or vendors and third-parties	1-5, 7	Our affiliates, service providers

	address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.				and third-parties
<b>C. Protected classification characteristics under California or federal law.</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial	YES	You or vendors and third-parties	1-5, 7	Our affiliates, service providers and third-parties

	genetic information).				
<b>D. Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	You or vendors and third-parties		Our affiliates, service providers and third-parties
<b>E. Biometric information.</b>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES	You	N/A	N/A
<b>F. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	Your activity on our site or vendors and third-parties	1-7	Our affiliates, service providers and third-parties
<b>G. Geolocation data.</b>	Physical location or movements.	NO	N/A	N/A	N/A
<b>H. Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	You	N/A	N/A

<b>I. Professional or employment-related information.</b>	Current or past job history or performance evaluations.	YES	You or vendors and third-parties	1, 4, 5	Our affiliates, service providers and third-parties
<b>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</b>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	N/A	N/A	N/A
<b>K. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	You, or from vendors and third-parties	1-5, 7	Our affiliates, service providers and third-parties

**1.6. Sale of Personal Information:**

We do not and will not sell your personal information. We do not and will not sell the Personal Information of minors under 16 years of age without affirmative authorization.

**2. YOUR RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT OF 2018**

The CCPA provides consumers (California residents) with specific rights regarding their personal information —the Right to Know, the Right to Delete, the Right to Opt-Out and the Right to Non-Discrimination. This section describes your CCPA rights and explains how to exercise those rights.

**2.1. Right to Know and Data Portability Rights:**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request for access, we will disclose to you:

- The categories of personal information we collected about you.



- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or sharing that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, the categories of personal information shared with each category of recipients.

We may deny your request for access if we are unable to verify your identity or have reason to believe that the request is fraudulent.

## **2.2. Right to Delete:**

You have the right to request that we delete any of your personal information that we collected and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers and third parties to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the personal 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 the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- 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 pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- 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 the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- Comply with a legal obligation.
- Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

We may also deny your deletion request if the personal information is subject to an exemption under the FCRA, the GLBA, the FIPA, or the DPPA. Additionally, we may deny your request to delete if we are unable to verify your identity or have reason to believe that the request is fraudulent.

### **2.3. Right to Opt-Out:**

The CCPA provides consumers with the right to opt-out of the sale of your personal information (“Right to Opt-Out”). However, we do not and will not sell your personal information. We do not and will not sell the Personal Information of minors under 16 years of age without affirmative authorization.

### **2.4. Right to Non-Discrimination:**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **3. SUBMITTING A VERIFIED CONSUMER REQUEST**

### **3.1. Exercising Right to Know, Data Portability, and Right to Delete:**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

Calling us at 888-384-1227

Visiting [https://www.callcheckmate.com/california/california\\_privacy\\_act.php](https://www.callcheckmate.com/california/california_privacy_act.php)

Making a verifiable consumer request does not require you to create an account with us.

Only 1) you, 2) a person authorized by you to act on your behalf, or 3) an entity registered with the California Secretary of State and authorized by you to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access (aka Right to Know) or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Given the sensitivity of your personal information that we collect and retain, for a data portability request, we will need to verify your identity with at least 3 separate pieces of information such as name, address, account number, date of birth, last 4 of your Social Security Number, phone number, etc.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

For Requests to Know specific pieces of information (aka a data portability request), you will need to sign and return a declaration signed under the penalty of perjury stating that you are making the request on behalf of yourself.

### **3.2. Authorized Agents:**

Before we can respond to a verifiable consumer request submitted by an authorized agent, we need to confirm not only that person or entity's authority to act on behalf of a consumer and verify the identity of the authorized agent. If you are authorized to submit a request on behalf of a California resident, please email us at [compliance@callcheckmate.com](mailto:compliance@callcheckmate.com) and provide the following information:

1. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:
  - California Secretary of State authorization,
  - written permission from the California resident, or
  - power of attorney
  
2. To verify your identity, please attach copies of the following to your request email:
  - Valid Government Issued ID (not expired) **AND**
  - a Utility Bill, Bank Statement, or similar documentation to verify your name and address
  
3. You will also be required to verify the identity of the consumer for whom you are submitting the request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **3.3. Response Timing and Delivery Method:**

We will acknowledge receipt of the request within 10 days of its receipt. We will respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will provide the responsive information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **4. CHANGES TO OUR CALIFORNIA DISCLOSURES AND PRIVACY POLICY**

We reserve the right to amend these California disclosures and privacy policy at our discretion and at any time. When we make changes to these California disclosures and privacy policy, we will notify you by email or through a notice on our website homepage.

## **5. HOW TO CONTACT US**

If you have any questions or comments about this policy, the ways in which we collect and use your personal information, your rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Privacy Support Phone:	(760) 431-2500
Privacy Support E-Mail:	<a href="mailto:compliance@callcheckmate.com">compliance@callcheckmate.com</a>
Website:	www.callcheckmate.com
Postal Address:	Checkmate Attn: Compliance Department P.O. Box 35220 Phoenix, AZ 85069

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