

EXAMPLE

The Chowder, Inc. Privacy Policy

Document version: 1

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Chowder, Inc. (we, us, Chowder, Inc.) is committed to protecting your privacy. It is critical that all users (you, your) of Chowder, Inc. (www.easypay.chowderfinancial.com) feel confident that their privacy is protected. Chowder, Inc. will not sell, disseminate, disclose, trade, transmit, transfer, share, lease or rent any personally identifiable information to any third party not specifically authorized by you to receive your information except as we have disclosed to you in this Privacy Policy.

1. Information We Collect From You

When you visit Chowder, Inc., we may collect information from you. This information includes but is not limited to: IP Address, your Operating System, pages visited, total time spent on website or specific pages, links that are clicked, and your browser type and version.

2. Furnishers of User Data

In order for Chowder, Inc. to function for a user (the customer), data must have been furnished to Chowder, Inc. that contains certain user data. Chowder, Inc. maintains data for banks, lenders, and debt purchasers (creditors). Data may be furnished directly by your creditor or by a third party collection company authorized by a creditor (Furnishers). Chowder, Inc. does not own the data furnished to us. Chowder, Inc. provides Furnishers the minimum type of data required for Chowder, Inc. to function. The minimum data required for Chowder, Inc. to function is: user's name, social security number, address, phone number, original creditor name, current creditor name, account number, reference number, and balance. Furnisher may maintain additional user data. Chowder, Inc. has no control over what data Furnishers maintain within the Chowder, Inc. framework and/or to what extent beyond the minimum data requirements Furnisher may maintain within the Chowder, Inc. framework. Chowder, Inc. makes no warranty or guarantee as to the accuracy of Furnisher's data.

In order for a visitor to use Chowder, Inc., they must first authenticate they are the correct person (the customer) to access the data by providing verification criteria, including but not limited to: the last four digits of their social security number along with either the phone number they were contacted at or by entering in the reference number the creditor provided. To utilize the online negotiation tools of Chowder, Inc., no additional information is required by the user.

When a user makes an offer within the creditor's guidelines or accepts a counter offer presented by Chowder, Inc. on behalf of your creditor, the user will proceed to the payment portal. The user must provide additional information at the payment portal, as is standard in all payment portals. The data you provide will be collected to process your payment. This information may include, but is not limited to: your name, address, email address, phone number, form of payment and information required to process the payment such as: a bank account number and routing number or credit card number, expiration date and SEC code. In some cases, payment information is stored in Chowder, Inc.'s secure database in order to transmit the information to the creditor or collection company for processing. Such information will never be shared except with your creditor or the collection company and others necessary to complete a transaction. Chowder, Inc. always keeps all data secure and private unless expressly authorized by you that it may share.

3. Use and Sharing of Data Collected

Chowder, Inc. may disclose information we collect to non-affiliated third parties that are acting on our behalf, or as permitted or required by law. The information that is collected, used and shared is limited to purposes that intend to improve your experience with Chowder, Inc..

Chowder, Inc. may use and share information as described below:

To inform customers of Chowder, Inc. (creditors and collection companies) statistic on visitors and users;

Product and software development;

For editorial and feedback purposes;

To analyze user site usage;

To send alerts specific to your creditors and offers they may make;

To deliver to you any administrative notices relating to the use of Chowder, Inc.;

In response to subpoenas and other legal processes;

For marketing and promotional purposes;

To enforce Chowder, Inc.'s Terms of Use; and

As otherwise stated in the Privacy Policy.

4. Offers for Third Party Products and Links to Other Websites

Chowder, Inc.'s site may contain links to independent third party websites and/or offers for services from third parties. If you choose to use any such third party products or services, disclose information to the providers, or grant them permission to collect information about you, then their use of your information is governed by their privacy policies and any terms and conditions applicable to such products or services. Chowder, Inc. is not responsible for the content or privacy policies of other such sites.

Chowder, Inc. may also have relationships with third parties that provide products or services on Chowder, Inc.'s site and other related sites. These companies are clearly indicated on our Websites. Chowder, Inc.'s privacy policy does not apply to services or products offered by any third party. If you decide to request services or products from such companies, you grant Chowder, Inc. permission to provide these third parties with personal information about you necessary to fulfill or process your request.

5. Emails from Chowder, Inc.:

Users that provide their email address may occasionally receive emails from Chowder, Inc.. Users have the option to opt-out of receiving emails from Chowder, Inc. at any time by emailing payments@chowderfinancial.com. If a user has subscribed to a service to receive notification should an additional reduced offer become available, opting out of emails will cancel the subscription and the notification of offer will not be sent. If user chooses to opt out, it is the user's decision alone; user cannot and will not hold Chowder, Inc. responsible for any consequences due to opting out of emails.

6. Cookies

Chowder, Inc. may set and access cookies on your computer to track and store data you have entered while visiting www.easypay.chowderfinancial.com. At Chowder, Inc., a cookie is used to identify one unique visitor from another visitor. Our cookies are encoded so that only we can understand the data stored in them. All cookies expire and are deleted as soon as the user closes their browser.

7. Security

Chowder, Inc. uses a number of security measures to protect the security and integrity of your data. Once any personal data comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorized access, modification or disclosure.

We use encryption methods and authentication processes to maintain your security when you are using www.easypay.chowderfinancial.com. Firewall barriers are also used to protect your account and information, from unauthorized access. Chowder, Inc. site is tested and monitored regularly to ensure all areas are protected from possible hacking. The Chowder, Inc. maintains servers in a secure location. Access to our servers requires several levels of authentication.

It is important to understand that while Chowder, Inc. takes the above precautions to safeguard your information at Chowder, Inc., these precautions do not extend to any Third Party websites you may come across.

8. Public Forums outside Chowder, Inc.

Chowder, Inc. may provide users access to submit, post, display, transmit and/or exchange information, ideas, opinions, photographs, images, video, creative works or other information in chat rooms, blogs, or bulletin boards within www.easypay.chowderfinancial.com. You should be aware that any material you submit in the forums can be read, retrieved and used by other users and may be used to send you unwelcomed messages. Chowder, Inc. is not responsible for the personal information you decide to submit to these forums. These forums may be hosted by Chowder, Inc. and related entities or by one of our third party service providers on our behalf.

9. Disclosure of your information to protect Chowder, Inc.'s rights or if required by law

Notwithstanding the foregoing, The Chowder, Inc. reserves the right (and you authorize Chowder, Inc.) to share or disclose your personal information when Chowder, Inc. determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

To enforce our rights against a user or in connection with a breach by a user of this Privacy and Security Policy or The Chowder, Inc. Terms of Use;

To enforce our rights against a data furnisher or in connection with a breach by a furnisher;

To provide user data collected by Chowder, Inc. to a furnisher;

To prevent prohibited or illegal activities; or

When required by any applicable law, rule regulation, subpoena or other legal process.

10. Our Right to Contact Users

We reserve the right to contact site visitors and users regarding use of Chowder, Inc., status, changes to agreements, Privacy Policy, Site Terms of Use or any other policies or agreements relevant to site visitors.

11. Changes to Our Privacy Policy

If we make material changes to Chowder, Inc.'s Privacy Policy, we will notify you by using one of the following methods at least thirty (30) days prior to the effective date of change: We will post a notice on a webpage within www.easypay.chowderfinancial.com describing the change(s) or we will send you an email notifying you of the change(s).

12. Contact us with questions or concerns

If you have any questions or concerns regarding this Privacy Policy, please send an email to payments@chowderfinancial.com.

Chowder, Inc.

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