# Williams Rush & Associates

## **Notice of Privacy Policy**

## Introduction

Williams Rush & Associates is committed to preserving, protecting, and respecting the privacy and security of your personal information and data. This Privacy Policy ("Policy") summarizes our policies and processes for protecting the privacy of all personal information gathered from consumers, customers, potential customers, clients, potential clients and visitors to our website <a href="https://williamsrush-associates.com/">https://williamsrush-associates.com/</a>. This policy explains when and how such information is collected, used and safeguarded. This Policy covers the Website of Williams Rush & Associates and all online forms contained on this Website used to collect personal information. It does not cover third-party sites that are linked to or from the Website. This Policy does not apply to other entities that we do not own or control. By using this Website, you are agreeing to the terms of this Policy. If you do not agree with any terms or practices described in this Policy, please exit from this Website. Various federal and state laws and regulations require personally identifiable and/or otherwise protected consumer information to be protected from unauthorized access and/or disclosure.

## **Collecting Personal Information**

You can access our Website without providing us with any personal information. However, Williams Rush & Associates does collect personal information in various locations on our website when you request specific information. We may collect information that can identify you to access our portal. Such information includes your name, address, telephone number(s), account number and Social Security number or other identifying information.

## **Information We Collect**

When you request information from our Website, such as detail or information regarding your account, we ask you to provide Personal Information to verify that you are a person to whom such detail can be provided.

In addition to the information you volunteer when you log in to our Website, we may also collect additional information as follows. Our server logs automatically collect information, such as your IP address, your browser type and language, and the date and time of your visit. This helps us to track user's movements around our Website and understand trends. We may assign your computer one or more cookies, which collect information that tracks your use of our Website and enables us to customize our services. We may use this data in aggregate to better understand the needs and interests of visitors to our Website. This information is collected on an aggregated and anonymous basis.

Our primary goal in collecting the information described above is to provide you, the user, with a customized experience on our Website. By knowing a little about each user, we are able to deliver better service and more relevant contact to our Website users and visitors.

## Cookies

A "cookie" is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. We may use cookies to track non-personal information about our users (e.g. pages viewed, time spent on our Website, and the websites visited just before and just after our Website) for statistical and market research purposes. The information is collected on an aggregated and anonymous basis.

We use cookies to gather information about our Website users' browser activities to improve our Website and better serve our Website users. We may use standard Internet tools, which collect information that tracks your use of our Website and enables us to customize our services. This information assists us in designing and arranging our web pages in a most user-friendly manner and to improve our Website to better meet the needs of our Website users and visitors.

## **Use of Personal Information**

We will not disclose any Personal Information collected, except as described below:

Williams Rush & Associates maintains adequate safeguards to prevent the improper use or disclosure of private information as defined in the Fair Debt Collection Practices Act (FDCPA), Gramm-Leach-Bliley Act (GLBA), Health Insurance Portability and Accountability Act (HIPAA) and their implementing regulations, and other applicable laws and regulations. Access to data that we hold on behalf of our clients is limited to individuals authorized by our clients and protected by individual secure login and password combinations. Otherwise, the provisions of this Policy are limited only by legal process, negotiated contract and the technical operation of the Website.

Users who wish to contact may do so through a form on the "Contact Us" page of our Website. Required information on the form includes your name and email address, and telephone number if you wish to have Williams Rush & Associates respond by telephone. Williams Rush & Associates may also be contacted directly by telephone.

Your information will not be sold, distributed, or disclosed to any other organization or entity without your consent or as is necessary to effectuate the transaction for which the data was provided to Williams Rush & Associates.

# Use by Williams Rush & Associates

We use the information you provide so that we may provide you with information that you requested or that we believe will be beneficial to you. We may use your Personal Information to customize the content you see on our Website, facilitate your use of our Website, manage your account and your preferences, analyze use of and improve our Website and services, identify and protect against fraudulent transactions and other misuses of our Website and enforce our Terms of Use. We may periodically send you news or information about Williams Rush & Associates and the solutions we offer. This could include notices, settlement offers and payment receipts.

## **Disclosures Required by Law**

We may disclose Personal Information when required by law or in the good faith belief that such action is necessary to conform to the requirements of the law or comply with and respond to legal process served on us.

## **Information Others May Collect**

We do not allow third-party advertising companies or ad networks to display advertisements on our Website. We DO NOT provide any Personal Information to unauthorized third parties.

## Sharing information with Third Parties

We do not sell or trade any Personal Information about our customers, prospects, consumers or visitors to any third parties. We will not share your Personal Information with others, except as indicated below. We may share Personal Information with:

- Service providers such as credit card payment processors performing services on our behalf;
- Consumer reporting agencies (aka credit bureaus) regarding your payment history with us; and,
- Law enforcement authorities in limited circumstances, such as preventing fraud and identity theft, protecting the safety of our users and complying with legal requirements, such as the Higher Education Act, the Family Educational Rights and Privacy Act, The Fair Credit Reporting Act, the Gramm-Leach Bliley Act, and their implementing regulations.

## Mobile originator and opt-in data will not be sold to or shared with any third parties.

# **Your Choices**

You may choose to:

- Not provide Personal Information, although that may result in your ability to obtain certain services or to use certain features of our Website;
- Delete or decline cookies by changing your browser settings, although if you do so, some of the features of our Website services may not function properly; and
- Review and update your Personal Information by contacting us at the address information below or, if you have an online account on our Website, by logging into that account.

# Storage of Personal Information and Security

We take reasonable precautions to protect the Personal Information we collect from our Website users and visitors. When users submit Personal Information via the Website, the information is housed in a secure database. To prevent unauthorized access, maintain data accuracy, and ensure the appropriate us of information, we have put in place physical, administrative, technological and other security measures to safeguard and secure the Personal Information we maintain from unauthorized access, alteration, use or disclosure. Williams Rush & Associates uses industry standard technology, such as firewalls, in an effort to protect the confidentiality of your Personal Information. Moreover, only employees who need the information to perform their duties are granted access to your Personal Information.

While we strive to protect your Personal Information, you should know that information sent over the Internet, whether by email, or by using our online system and Website, is not necessarily secure against interception. Therefore, we cannot be responsible for such interception and cannot guarantee the security of such information.

## **Changes to Our Privacy Policy**

From time to time, we may update our Privacy Policy to reflect changes in our practices and services. If we make the material changes in the way we collect, use or share Personal Information, we will notify you by prominently posting notice of the changes on our Website.

## **No Guarantees**

While this Policy states our standards for maintenance of Personal Information, and we will make efforts to meet them, we are not in a position to guarantee these standards. There may be factors beyond our control that may result in disclosure of Personal Information. As a consequence, we disclaim any warranties or representations relating to maintenance or nondisclosure of any Personal Information collected from Website users or visitors.

## Links to Third-Party Websites

Please be advised this Website may contain certain hyperlinks to other websites. Although these websites may have privacy policies, all of these websites and their privacy policies are independent of our Website and this Policy. We are not responsible for compliance with other websites' privacy policies or data collection practices. You should review these privacy policies carefully before providing personal information to these websites.

## **Protection of Children's Privacy**

We understand the importance of protecting children's privacy, particularly in an online environment. This Website is not designed to attract children under the age of thirteen (13).

## **Contact Us**

If you have questions or suggestions about our Website, this Policy or our information practices, please contact us.

info@williamsrush.com Attn: Compliance Department

## Security

This Website operates on a secure server at <u>https://williamsrush-associates.com/</u> enabled by a Network Solutions SSL certificate. The SSL certificate allows for secured communications and encrypted transactions between you and Williams Rush & Associates through your browser connection. In order to ensure the information being transmitted is as secure as possible, you must meet the minimum for Internet browsers. They are Microsoft Internet Explorer 7.0 (available at <u>http://www.microsoft.com/ie/</u>) or Firefox 3.5 (available at <u>http://www.mozilla.com/en-US/products/firefox/</u>).