

# Elite Financial Services California Privacy Disclosures

**Enacted:** January 1, 2020

These California Privacy Disclosures (“**CA Disclosures**”) provide additional information about how Elite Financial Services, LLC (“we”, “our”, “us”) collects, uses, discloses and otherwise processes personal information of individual residents of California within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”).

For purposes of these CA Disclosures, “personal information” has the meaning provided by the CCPA and does not include information that is publicly available, that is deidentified or aggregated such that it is not capable of being associated with an individual, information relating to our job applicants, employees, contractors or other personal, or information that is excluded from the CCPA’s scope, such as personal information covered by certain sector-specific federal privacy laws, including HIPAA, FCRA, GLBA or the Driver’s Privacy Protection Act of 1994.

## Collection and Use of Personal Information.

We collect personal information in connection with our products and services for various purposes. For example, we use personal information to process your transactions or fulfill your requests; to communicate with you; to inform our marketing and advertising activities; to optimize and improve our products and services and to develop new products and services; and for other business, operational and commercial purposes.

In the last 12 months, we have collected the following categories of personal information:

- Identifiers, such as name, address, phone number, email address, date of birth, or other similar identifiers;
- California customer records, such as birth date and payment information;
- Commercial information, such as records of services purchased, obtained or considered;
- Internet/Network information, such as device information, logs and analytics data;
- Geolocation data, such as precise location data from your device or generated based on your IP address; and
- Inferences about your interests and preferences, generated from your use of our sites.

We collect this information directly from you, from our business partners and affiliates, from your browser or device when you visit our websites, or from third parties that you permit to share information with us.

## Disclosure of Personal Information.

We share the personal information we collect with third parties for business purposes. The categories of third parties to whom we disclose your personal information for a business purpose may include: (i) affiliates in our family of companies; (ii) our service providers and advisors, (iii) marketing and strategic partners; (iv) ad networks and advertising partners; (v) analytics providers; and (vi) social networks.

As is common practice among companies that operate online, we have permitted third party advertising networks, social media companies and other third party businesses collect and disclose your personal information (including Internet/Network information, commercial information, and inferences) directly from your browser or device through cookies or tracking technologies when you visit or interact with our websites, use our apps or otherwise engage with us.

## Your Rights and Choices.

As a California resident, you may be able to request to exercise certain rights under certain circumstances, including:

- The Right to Know any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:
  - The specific pieces of personal information we have collected about you;
  - The categories of personal information we have collected about you;
  - The categories of sources of the personal information;
  - The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
  - The categories of personal information we have sold and the categories of third parties to whom the information was sold; and
  - The business or commercial purposes for collecting or selling the personal information.
- The Right to Request Deletion of personal information we have collected from you, subject to certain exceptions.
- The Right to Opt Out of Personal Information Sales to third parties now or in the future.

You also have the right to be free of discrimination for exercising your rights under the CCPA.

Please note that while we will comply with any applicable obligations under the CCPA, we may not have an obligation to, or may not be able to, honor your request.

## To Submit a CCPA Request.

You may submit a request to exercise your California Consumer Rights through one of the mechanisms described below. We will need to verify your identity before processing your request, which may require us to request additional personal information from you. In certain circumstances, we may decline or limit your request, particularly where we are unable to verify your identity or locate your information in our systems, or as permitted by law.

- To exercise your Right to Know, please email [staff@livedebtfree.net](mailto:staff@livedebtfree.net).
- To exercise your Right to Request Deletion, please email [staff@livedebtfree.net](mailto:staff@livedebtfree.net).
- To exercise your Right to Opt Out of Personal Information Sales, please email [staff@livedebtfree.net](mailto:staff@livedebtfree.net).
- To opt out or control the use of your personal information by social media, advertising and analytics partners, please email [staff@livedebtfree.net](mailto:staff@livedebtfree.net).

## Online Advertising.

We participate in interest-based advertising and use third party partners to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. These third parties collect information about your use of our websites over time so that they may play or display ads on our Service, on other websites, apps or services you may use, and on other devices you may use. Typically, though not always, the information collected and used for interest-based advertising is collected through tracking technologies, such as cookies, Flash objects, web beacons, embedded scripts, mobile SDKs, location-identifying technologies, and similar technology. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms.

Most browsers allow you to adjust your browser settings to: (i) notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. We do not currently recognize Do Not Track signals set by your browser. To learn about interest-based advertising and how you may be able to opt-out of some interest-based advertising, you may wish to visit the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org/choices> and/or the DAA's resources at [www.aboutads.info/choices](http://www.aboutads.info/choices). Please note that these opt-out choices may not affect online advertising that is not cookie-based and you must perform these opt-outs on each browser or device you may use.

## Updates to these CA Disclosures.

We will update these CA Disclosures from time to time. When we make changes to these CA Disclosures, we will change the “Last Updated” date at the beginning of these CA Disclosures. If we make material changes to these CA Disclosures, we will provide reasonable notice. All changes shall be effective from the date of publication unless otherwise provided in the notification.

## Contact Us.

If you have any questions or requests in connection with this Notice or other privacy-related matters, please send an email to [staff@livedebtfree.net](mailto:staff@livedebtfree.net) with the subject line “CCPA Inquiry.”

Alternatively, inquiries may be addressed to:

Elite Financial Services, LLC  
100 Cummings Center, Suite 141A  
Beverly, MA 01915

# Do Not Sell My Personal Information

## We respect your privacy.

We respect the privacy of our customers and are committed to complying with applicable laws, including, to the extent applicable, the Gramm-Leach Bliley Act and the Fair Credit Reporting Act.

If you are a California resident, you may be able to exercise certain data rights under the California Consumer Privacy Act (CCPA), including the right to opt out of the sale of your personal information (as defined in the CCPA), subject to certain exceptions. Please note, however, that while we will comply with any applicable obligations under the CCPA, we may not have an obligation to, or may not be able to, honor your request.

To submit an opt-out request, please send an email to [staff@livedebtfree.net](mailto:staff@livedebtfree.net) with the subject line "CCPA Opt-Out Request". In your email, please include your (1) name, (2) address, (3) phone number, and (4) the last four digits of your social security number.

Or, if you prefer, you may submit an opt-out request by calling **1-866-922-0040** between the hours of 9 a.m. and 5 p.m. Eastern Standard Time, Monday through Friday.

In certain circumstances, we may require additional information if we are unable to verify your request based on the information you have provided. The personal information submitted in connection with this request will be used for the purpose of processing your request.