

NATIONAL FORECLOSURE MITIGATION COUNSELING PROGRAM

Privacy Principles

INTRODUCTION

Consumer Credit Counseling Service (“the Agency”) is an IRC 501(c)(3) nonprofit financial and credit counseling agency. Through its membership in the National Foundation for Credit Counseling (“NFCC”), the Agency is participating in the National Foreclosure Mitigation Counseling Program (“NFMCP”). The NFMCP is a federal program created and funded by Congress and administered by NeighborWorks America (“NWA”). By participating in the NFMCP, the Agency is able to provide you with assistance and counseling in dealing with your mortgage concerns. However, in order to provide you with the NFMCP assistance and counseling, it is necessary to collect nonpublic personal information about you and your financial situation, and to submit that information to the NFCC and NWA for purposes of administering the program.

The Agency is committed to assuring the privacy of individuals and/or families who have contacted us for assistance. We realize that the concerns you bring to us are highly personal in nature. We assure you that all information shared both orally and in writing will be managed within the legal and ethical considerations and requirements of the NFMCP and in accordance with the policies described herein. If you have any questions about these policies, or our privacy practices, please contact us at: **877-881-2227**.

TYPES OF INFORMATION WE GATHER ABOUT YOU

We may collect the following types of nonpublic personal information from you (hereinafter referred to as “Personal Information”):

- Information that we receive from you orally or in writing, or on applications or other forms, such as your name, address, social security number, assets, and income;
- Information about your transactions with us, your creditors, or others, such as your account balances, payment history, parties to transactions and credit usage;
- Account information, including account balances, payment history, and account usage;
- Information that we obtain from non-affiliated third parties about your transactions with them; and
- Information we receive from a credit reporting agency, such as your credit history.

CATEGORIES OF PERSONAL INFORMATION THAT WE DISCLOSE AND THE CATEGORIES OF NON-AFFILIATED THIRD PARTIES WITH WHOM WE SHARE THE INFORMATION

- As part of the NFMCP, we will disclose some or all of the Personal Information to the NFCC, NeighborWorks America (“NWA”), and their administrators, subsidiaries, program monitors, and agents. These disclosures are a requirement of our participation in the NFMCP, which makes our services possible.
- We may disclose some or all of the Personal Information to your creditors or other non-affiliated third parties, such as financial service providers or creditors, where we have determined (i) that it

would be helpful to you, (ii) that it would aid us in providing our counseling services to you, (iii) in order to fulfill a service requested by you, (iv) or where it is a requirement of participation in the NFMCP. All non-affiliated companies that act on our behalf and receive Personal Information from us are contractually obligated to keep the information we provide to them confidential, and to use the Personal Information we share only to provide the services we ask them to perform.

- In order to provide our services to you, we also may share any of the categories of Personal Information within our organization, to subsidiaries, affiliates or other related entities.
- We may also disclose any Personal Information about you to anyone as permitted by law (e.g., if we are compelled by legal process) or in the good faith belief that such action is necessary in order to conform to the requirements of law or comply with legal process served on us, protect and defend our rights or property, including the rights and property of the Agency or act in urgent circumstances to protect the personal safety of consumers who use our services.
- We may also disclose any or all Personal Information to the following parties or in the following instances: (i) NFCC, NWA, or their administrators, subsidiaries, program monitors, and agents to the extent that it is a requirement of participation in the NFMCP, which make our services possible; (ii) non-affiliated third parties, such as financial service providers or creditors; (iii) our organization, subsidiaries, affiliates or other related entities; (iv) or as permitted by law (e.g., if we are compelled by legal process).

In addition, the Agency reserves the right to disclose certain Personal Information that it does not currently disclose to the non-affiliated parties referenced above. From time to time, we may also use anonymous aggregated case file information for the purpose of evaluating our services, gathering valuable research information and designing future programs. This data is not personally identifiable.

RIGHT TO OPT-OUT OF CERTAIN DISCLOSURES

- You have the right to opt-out or prevent us from making disclosures of your Personal Information to non-affiliated third parties such as your creditors or other parties we feel would be helpful to you or that would aid us in counseling you. If you choose to opt-out, we will not be able to answer questions from your creditors. To opt-out, please contact us at: **877-881-2227**.
- You have the right to opt-out or prevent us from making disclosures of your Personal Information to the NFCC, NWA, or their administrators, subsidiaries, program monitors, and agents; however opting-out will terminate the NFMCP counseling services provided to you because the Agency cannot provide these services to you without disclosing your Personal Information. To opt-out, contact us at: **877-881-2227**.
- If at any time, you wish to change your decision with regard to your opt-out, you may contact us at: **877-881-2227**.

THE CONFIDENTIALITY AND SECURITY OF YOUR INFORMATION

Within the Agency, we restrict access to Personal Information about you to those employees who need to know that information to provide services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.