



## Personal Information Privacy Policy

Cerida Investment Corporation d/b/a Call Center Services (CCS) believes in protecting your privacy. When we collect personal information about you, we comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce and the European Commission regarding the collection, use, retention and transferring of personal data from the European Union to the United States. CCS has certified that it adheres to the EU-U.S. Privacy Shield Framework, including privacy principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement and liability. To learn more about the EU-U.S. Privacy Shield Framework, and to view our certification page, please visit: <https://www.privacyshield.gov/>.

Additionally, when we collect personal information, we comply with the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union. CCS has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit <http://www.export.gov/safeharbor/>.

These are our promises to you:

1. **Notice.** When we seek to collect your personal information, we will give you timely and appropriate notice by describing what personal information we seek to confirm or collect (which consists of: the individual's name and title; business name, address, email and phone number), advising that we are calling on behalf of a client and will be providing that client with the information received. This information is collected and used exclusively for purposes of conducting business with our customers. We will collect only as much personal information as we need for specific, identified purposes as per our client, and we will neither disclose the information to any third party nor use it for any other purpose, without first obtaining your consent. If you would like to opt out, simply contact us as indicated in Paragraph 6. You may also contact us if you would like access to your information and/or have questions related to our use of your information.
2. **Choice.** We will give you choices about the ways we use and share your personal information, and we will respect the choices you make. Specifically, you will be able to choose whether to provide any personal information and your choice will be respected. If you would like to opt out, simply contact us as indicated in Paragraph 6. You may also contact us if you would like access to your information and/or have questions related to our use of your information.
3. **Onward Transfer/Sharing.** Except as described in this Privacy Policy, we will not share your personal information with third parties without your consent, except to the extent required in response to a lawful request by public authorities, including those related to national security or law enforcement. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, CCS is potentially liable.
4. **Security.** We will take appropriate physical, technical, and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.
5. **Data Integrity & Purpose Limitation.** We will take reasonable steps to ensure that the data collected is reliable for its intended use and is accurate, complete and current. We will process and use your personal information in a way that is compatible with the purposes for which it is being collected, or as permitted by law, in compliance with this Privacy Policy.
6. **Access.** We will provide you with access to your personal information and you will be able to correct, amend or delete that information where inaccurate. To access your information, ask questions about our privacy practices, or issue a complaint, contact us at:

Ms. Cassandra Rheault, General Manager  
Cerida Investment Corporation d/b/a CCS  
175 Cabot Street, Suite 440  
Lowell, MA 01854  
978-649-3682 ext. 212  
978-513-1229 (direct)  
[cassandra.rheault@answernet.com](mailto:cassandra.rheault@answernet.com)

7. Recourse, Enforcement and Liability. We will regularly review how we are meeting these privacy promises and will provide an independent way to resolve complaints about our privacy practices. You are encouraged to contact CCS with questions or issues regarding this Privacy Policy. We will investigate the inquiry, respond to it and attempt to resolve any concerns regarding privacy. Please see below for additional options for resolution of your inquiries, to the extent they are not resolved by CCS. CCS is subject to the investigatory and enforcement powers of the Federal Trade Commission.

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[cassandra.rheault@answernet.com](mailto:cassandra.rheault@answernet.com)

In order to comply with the EU-U.S. Privacy Shield Framework, CCS is committed to the resolution of complaints concerning privacy and our collection or use of personal information. We are also committed to refer unresolved privacy complaints from EU individuals to an independent dispute resolution mechanism, the BBB EU Privacy Shield Program, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by CCS, you are encouraged to visit the BBB EU Privacy Shield Program web site at <http://www.bbb.org/EU-privacy-shield/for-ue-consumers>, for more information and to file a complaint, free of charge.

CCS has further committed to refer unresolved privacy complaints from Swiss individuals under the US-Swiss Safe Harbor to an independent dispute resolution mechanism operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.