



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 and the Swiss-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 and Switzerland to the United States, respectively. CCS has certified to the Department of Commerce that it adheres to these Privacy Shield Principles, including privacy principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement and liability. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit: <https://www.privacyshield.gov/>.

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 and Swiss individuals received pursuant to the EU-US and Swiss-US Privacy Shield Principles, 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

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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In order to comply with the EU-U.S. and Swiss-U.S. Privacy Shield Principles, CCS is committed to the resolution of complaints concerning your privacy and our collection or use of personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact:

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CCS has further committed to refer unresolved privacy complaints under the EU-U.S. and Swiss-U.S. Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, 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, please visit <http://www.bbb.org/EU-privacy-shield/for-ue-consumers> for more information and to file a complaint, free of charge.

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.