

# HOUSING AND CREDIT COUNSELING, INC. INTERNET PRIVACY & USAGE POLICY

Housing and Credit Counseling, Inc. doing business as Housing and Credit Counseling, Inc. and HCCI (“HCCI”) is committed to maintaining the integrity and privacy of your personal information. This privacy policy and usage statement is intended to explain our information collection and dissemination practices in connection with the HCCI family of websites located at [www.hcci-ks.org](http://www.hcci-ks.org) (the “Sites”).

## **Agreement**

By using this website, you agree to our Internet Privacy and Usage Policy and to the use of the information we receive and collect as stated herein and in ways we may notify you of in the future. By providing any personal information to this site, you acknowledge that you fully understand and consent to the collection and processing of such information. We reserve the right at our discretion to modify this Internet Privacy and Usage Policy at any time. Your continued use of this site following the posting of changes to these terms means you accept these changes.

## **Description of Services**

HCCI provides you with access to a variety of resources including educational materials, press releases, financial calculators, monthly statements and deposit receipts which will be collectively referred to as "Services". The Services, including any update and additions, are subject to this policy. We do not lend money.

## **Personal Use Limitation**

The Services are for your personal use. You may not modify, copy, distribute, transmit, display, reproduce, publish, license, or sell any information obtained from Services. Permission to use the Educational materials from the Services is granted, provided that (1) use of such Educational Materials is for informational or personal use only, and (2) no modifications of any Educational Materials are made. Accredited educational institutions may download and reproduce Educational Materials for use in the classroom.

## **Personal Information We Collect**

In order to monitor the Sites’ performance, provide you with a better experience when visiting the Sites and for statistical and routine system maintenance purposes, HCCI may automatically collect information from you through the use of cookies. Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize your device, facilitate and improve your interaction with our Sites and our services.

We also collect information, including personal information, provided by visitors as a result of their interactions with our Sites or that is shared through our Sites. “Personal information” is data that reasonably can be used to identify an individual. We may collect and process the following data about you:

- Information that you provide to us by completing forms or surveys on our Sites, including information provided at the time of registering to participate in counseling or attend our conferences or events, or subscribing to newsletters, updates, and other communications, such as contact details, name, email address, mailing address, and phone number.
- Information that you share through our Sites by using our services including any personal information in the data that you share.

- Information about your interaction with our Sites and services, including home server domain name, IP address, repository ID, geographic location, account activity, license information, and type of computer, operating system, and web browser used to access our Sites.
- Information you provide to us when you contact us for customer or technical support.
- Information that you provide to us when carrying out transactions through our Sites including payment details such as credit card information and billing address.
- Information we receive from third party search engines relating to your search activity.
- Details of your visits to our Sites including, but not limited to, traffic data, location data, weblogs and other communication data and the pages and resources that you access, including the date of access.
- Information you provide to us when you register for events, request information or materials, and participate in promotions, contests or giveaways.
- Information you provide when you submit questions or comments to us.

**Collection of Personal Data from Children**

HCCI does not attempt to collect personal information from children. Personal information sent to HCCI, such as an email, which appears to be from a child, will be deleted. HCCI cannot always determine if a visitor to its Sites or the sender of an e-mail is a child but will exert our best efforts to do so.

**How We Use Personal Information**

Data collected by HCCI will be used by HCCI for purposes consistent with the way in which it was collected or submitted, such as to:

- Create and maintain your account.
- Process, fulfill, and follow-up on your attendance at events or conferences.
- Process your account registration.
- Answer your questions.
- Send you newsletters, updates, and other communications that you have requested.
- Send you information about our services and resources.

**Disclosure of Personal Information to Third Parties**

HCCI will not sell, share, rent or disclose to third parties any personally identifying information, such as names, mailing address, email addresses, telephone numbers, and other personal information which you voluntarily provide to us, unless we secure your permission to do so, except to:

- Provide the services you have requested.
- Comply with applicable laws or valid legal processes.
- Protect HCCI’s intellectual property and other legal rights.

Personal information that you provide voluntarily is only available to our employees managing this information and to contracted service providers for the purposes of providing services relating to our communications with you. Names, mailing addresses, e-mail addresses, and telephone numbers provided by users may be added to HCCI’s databases and used for future communications regarding Site updates, new products and services, upcoming events, and other matters.

We may, from time to time, send you newsletters, updates and other communications regarding our services and events. HCCI works with third-party vendors to provide users with its newsletter and communications services. While these vendors will have access to your personally identifiable information in order to provide email services, they are required to maintain the privacy of all information in their control. You may opt out of receiving any HCCI newsletters, updates, or other emails by clicking “unsubscribe” at the bottom of each email and following the subsequent instructions.

## **Request for Services**

If you submit a request for service, your information will be captured in our database and provided to one of our employees to contact you.

## **Bankruptcy Services**

The Executive Office of the US Trustee does require HCCI to submit client information in order to generate a pre-filing or pre-discharge certificate associated with bankruptcy services. The information provided may include client name, bankruptcy case number, bankruptcy district and division, and the date and time services are provided.

## **Log Files**

As is true of most Web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. On rare occasion, unexpected software errors occur, and our servers log data related to those software errors into a log file. It is possible that the data recorded in those log files may contain customer specific information. However, that data is kept in a secured location that is only accessible to engineers that require access to such log files. We do not use this data for any purposes other than for debugging and diagnosing software problems. We do not link this automatically-collected data to personally identifiable information.

## **Safeguard Information**

We safeguard information by regularly reviewing our security standards and procedures to help prevent unauthorized access to personal information. The information that we receive from you is important in meeting your needs and providing consistent service quality. We will permit only authorized employees who are trained in the proper handling of customer information to have access to your information. We regularly test our technology and employ multiple defenses to protect the confidentiality of information about you.

## **Legal Disclaimer**

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal processes.

## **Registration for HCCI Sites**

Registration is not required to access our Sites.

## **Personal Information Shared in Public Forums**

HCCI may provide bulletin boards, blogs, or chat rooms on its Sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. HCCI is not responsible for the personal information you choose to submit in these forums.

## **Access to and Ability to Correct Personal Information and Opt-Out Right**

Users may modify, correct, change, update, obtain a summary of their personal records, or request their personal records to be removed from our database by contacting us via the mailing address, email or telephone number listed below. In response to such a request, HCCI will send personal records only to the email or mailing address on file for the username associated with it.

You may opt out of having your personal information collected by HCCI by not completing online forms, signing up for services, or creating an account. To opt out after submitting personal information, Users must contact us at [hcci@hcci-ks.org](mailto:hcci@hcci-ks.org).

You may request that HCCI remove from its database any personally identifiable information you had previously provided. However, even after you submit a request to delete your information or deactivate your account, copies of your information including but not limited to name and email address may be retained by us as backup copies for legal and compliance reasons following HCCI's Record Retention Policy guidelines.

### **Links to Third-Party Websites**

Our Sites may contain links to other websites. HCCI does not endorse, and is not responsible for, the privacy practices or the content of such other websites. We do not review or control such websites and suggest that you review the privacy policies of these websites before accessing.

### **Downloads**

HCCI cannot and does not guarantee or warrant that files available for downloading through the site will be free of infection, viruses, worms, or other code that manifest contaminating or destructive qualities. You assume total responsibility and risk for your use of the site and the Internet.

### **Security and Protection of Personal Information**

All personal information you provide to us through our Sites is stored on secure servers operated by us or our third-party providers. Any payment transactions will be encrypted using Secure Socket Layer (SSL) technology. In addition, HCCI and its business partners enter into confidentiality agreements which require that care and precautions be taken to guard against loss, misuse, or disclosure of your personal information. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask that you not share your password with anyone. Although we will do our best to protect your personal information, we cannot guarantee the security of your data. Any transmission is at your own risk. Once we have received your information, we will employ reasonable procedures and security features to guard against unauthorized access.

### **Unlawful or Prohibited Use**

You may not attempt to gain unauthorized access to any Services, other accounts, computer systems or networks connected to any HCCI server or to any of the Services, through hacking, password mining or any other means. You may not obtain or attempt to obtain any materials or information through any means not intentionally made available through the Services.

### **Disclaimer**

HCCI does not warrant the completeness, timeliness, or accuracy of the Services available on this website. In no event will HCCI be liable to any party for any direct, indirect, special, or other damages for any use of or reliance upon the information found at this web site, or on any linked web site, including, without limitation, lost profits, business interruption, loss of programs or other data, even if HCCI expressly advised of the possibility of such damages.

### **Amendments to Policy**

HCCI reserves the right to change this Policy at any time, without notice, by posting the new or revised Privacy Policy on the Sites.

**How to Contact Us**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to [hcci@hcci-ks.org](mailto:hcci@hcci-ks.org) or mailed to the following address:

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1195 SW Buchanan Street, Suite 100  
Topeka, KS 66604  
Telephone: 800-383-0217