

Milestone Privacy Policy

Effective: August 8, 2024

Milestone & Co., LLC (“Milestone,” “we,” “our,” or “us”) respects your privacy and is committed to safeguarding your personal information as detailed in this Privacy Policy. This Privacy Policy describes the types of personal information we may collect from you or that you may provide when you visit our websites at <https://milestoneseventh.com> or <https://app.milestonepathway.com/> (the “Site”), when you utilize the Pathway platform (“Pathway”) to obtain digital payment or complete a transaction, or that we otherwise obtain from you or third-parties to provide our settlement and qualified settlement fund (QSF) administration services (the “Services”). This Privacy Policy also describes how we use your personal information, and to whom and for what purpose your personal information may be disclosed.

Categories of personal information we have collected in the past 12 months

We only collect personal information that you provide to us, or that we otherwise obtain from third-parties, such as a law firm representing you, in order to provide our Services and/or complete transactions.

Category of Information Collected	Source of Information	Business Purpose for Collection
Identifiers, such as your name or business name, postal address, contact information, date of birth, e-mail address, IP address, browser type, browser version, web pages visited, time and date of webpage visit, and/or time spent on the webpage.	You, your use of our Websites and communications with our customer service representatives, and/or third-parties and third-party platforms that interact with us in order to obtain our Services.	To contact you; provide you or third-parties acting on your behalf, or other Milestone guests or customers, with services, or information you or third-parties on your behalf request; to complete a transaction or settlement payment; or to make our products and services better.
Sensitive personal information such as social security number, driver’s license/passport/state identification number, medical information, insurance information, signature, credit card number, or debit card number and/or financial account information, including settlement related information.	You, your use of Pathway, and/or third-parties that interact with us in order to obtain our Services.	See above. Generally, we collect these categories of information in order to render our Services or complete a settlement payment or transaction.

Our website also uses cookies. Cookies are small data files stored on your computer, and most browsers are set up to accept cookies by default. We use third-party cookies, like those from Google and others, for analytics, and those third-party cookies may be placed on your computer. Where we use third-party cookies or tracking software, your browsing information may be transmitted to those third parties, for example, to gather and send to us information about your browsing session. Depending on the browser you use, you may be able to block cookies, if you prefer. If you block cookies from our Site, you may not be able to use the full functionality of our Site. We do not respond to web browser “do not track” signals. We do not collect data on your online activities over time across third-party websites for advertising purposes.

How we use your personal information

We may use your personal information to provide our settlement and QSF services, complete a transaction, and to communicate with you. If you use our Pathway platform, we may also track your usage of the site to optimize functionality and determine how best to provide Services to you and others, or for marketing purposes. If you are a business contact of ours, we may use your personal information to contact you about a business transaction, or for marketing purposes.

Categories of personal information we have disclosed to third parties in the past 12 months and reason for disclosure

In the last past 12 months, we have not sold personal information or shared it for purposed of targeted advertising. However, we, like many companies that provide services to customers, may utilize third parties to perform specific functions on our behalf for specific business purposes. For example, we may disclose your personal information to the following categories of third parties under the following conditions:

- To provide services that you have requested or that third-parties have requested on your behalf to complete a transaction or otherwise obtain our Services.
- When we hire contractors to perform services for us including IT and data processing contractors.
- When disclosure is required by law. For instance, we will disclose your personal information if we receive a court order or valid subpoena instructing us to turn over data.
- To investigate suspected fraud, illegal activities, or threats to any person.

We will not collect additional categories of personal information or sensitive personal information or use the personal information or sensitive personal information we collected for materially different, unrelated, or incompatible purposes without providing you with notice, which will be provided by an updated version of this Privacy Policy posted on this web page. For that reason, we recommend that you review this page periodically as you use the Site or our Services.

Your Privacy Rights

Depending on where you reside, you may have certain privacy rights in relation to the personal information we collect or process. These rights include:

Access Rights

You may have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. We will disclose to you:

- The categories of personal information we collect about you.
- The categories of sources for the personal information we collect about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The categories of personal information disclosed to third-parties for a business purposes.
- To obtain a copy of the personal information that you previously provided to us in a portable and, to the extent technically feasible, readily usable format.

Deletion Rights

You may have the right to request deletion of any personal information we collect or retain from or concerning you, subject to certain exceptions. For example, even if you request deletion, we may deny your request if the information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected.
- Detect security incidents and product against any malicious, fraudulent activity.
- Debug and/or repair errors.
- Exercise free speech, ensure the right of another consumer to exercise that right of free speech, or exercise another right provided by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546).
- Engage in a public or peer-reviewed scientific, historical or statistical research that complies with all applicable ethics and privacy laws.
- Comply with a legal obligation.

Non-Retaliation Rights

You may be entitled to exercise your rights and be free from retaliation. This means that we will not do any of the following because you exercise any of your data rights:

- Deny you goods or services.
- Charge different prices for goods or services for exercising your rights (whether through denying benefits or imposing penalties).
- Provide you with a different level of quality of goods or services.
- Threaten you with any of the above.

Right to Correct Inaccurate Personal Information

You may have the right to request a correction of any inaccurate personal information we have about you, and we shall use commercially reasonable efforts to make such corrections after we receive a verifiable consumer request.

Right to Limit Processing Sensitive Personal Information

You may have the right to limit our use of the sensitive personal information we collect to the purposes for which it was provided. We only use your sensitive information to provide Services to you or as a processor or service provider for a law firm representing you.

Opt-Out Rights

You may have the right to opt out of the processing of the personal information for purposes of (i) targeted advertising, (ii) the sale of personal information, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects. Currently, we do not engage in any of these activities.

Exercising Your Rights

To exercise any of these rights, please contact us through one of the following means:

- Phone : 855-836-2676
- Website : <https://milestoneseventh.com/contact/>

Please note, often we receive personal information from law firms as part of the services we provide to them. To exercise your rights in relation to information your attorney may have provided to us, please contact your attorney directly.

The verifiable consumer request must:

- Provide sufficient information that allows us to verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient details that allows us to properly understand, evaluate, and respond to it.

Response Verification and Timing

If you make a request, we will need to verify or authenticate your identity (that you are the person that is the subject of the request, the legal guardian of that person, or in some jurisdictions an authorized representative) to carry out the requests. In order to verify your identity, we may ask for certain additional information that we will only use for the purpose of this verification. If we can't authenticate your identity, we will let you know. Note, in order to maximize the potential that we can identify you when you make a request, please use the information you provided to us, for example when you registered with one of our websites or otherwise communicated with us. If you use personal information not in our possession when you make a request, we may not be able to identify you.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt or as otherwise required by law. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

If we cannot process your request, we will inform you of the reason why. For data portability requests, where applicable, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without undue hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If, under applicable law, we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Appeal Rights

If we deny a request you make concerning your personal information, you may have the right to appeal that denial. If so, we will provide you information concerning your appeal right when we deny your request. We will respond to your appeal within 45 days of receipt, although this time may be extended as permitted by applicable law.

Upon receipt of our appeal decision, you may be able to submit a complaint to the Attorney General where you live. Under applicable law, we will provide you any information required of us concerning a complaint, when we provide you with our appeal decision.

Protecting Your Personal Information

We have put in place administrative, technical, and physical safeguards to protect your personal information. For example, we limit access to your personal information to our service providers and employees who use that information to provide products and services to you or to maintain or service those products or services. Our employees are bound by a Client Confidentiality policy. Third-party service providers enter into a contractual agreement with us which prohibits the service provider from disclosing your personal information for reasons other than to perform the services for which they were contracted or as they are otherwise permitted under applicable law. And we have adopted a security program to help protect our networks that may process your data.

Unfortunately, no data transmission, network or computer can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, there are security and privacy limitations inherent to technology which are beyond our control. The security, integrity, and privacy of any personal information and data exchanged between you and us cannot be guaranteed.

Children Under the Age of 13

Our Site and services are intended for users 18 years old and above. We do not knowingly collect information from anyone that we know is under the age of 13. In no event should children under the age of 13 provide any personal information through our website. If we become aware that we have been provided personal information online concerning a child under the age of 13, we will promptly delete it.

SMS Messaging

We may receive your mobile phone number from your attorneys in order to provide our services. As part of those services, we may send you SMS messages concerning our available programs, such as Pathway for you to obtain digital payment of your settlement, that your attorneys have made available to you. In addition, from time to time, we may reach out to you concerning programs or services that your attorneys consider making available to you. No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. This excludes text messaging originator opt-in data and consent; such information will not be shared with any third parties.

By electing to opt-in to our SMS messaging program by sending us an opt-in text message, you confirm that you are the subscriber or customary user of that mobile phone number and affirmatively consent to our use of your mobile phone number for calls and texts (including prerecorded and/or by automatic telephone dialing systems) in order to provide

you with marketing messages or messages concerning a product or service you have requested. Standard message charges or other charges from your wireless carrier may apply. You may opt-out of receiving text messages from us by using the keyword to stop conversations that will be sent with the first message or other process as may be set forth in the text. You understand that we may send you a text confirming any opt-out by you.

Duration of Personal Information Processing

We will store and process your personal information during the period necessary depending on the purposes of the processing, the contractual relationship between us and to comply with record retention laws and regulations.

Contact Information

If you have questions or concerns about our privacy policy, you may contact via the “Contact” link at <https://milestoneseventh.com/contact/>