

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.
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Information We Collect Automatically

When you visit our website, we automatically collect certain information about your device and interaction with our Services using Google Analytics, a web analytics service provided by Google LLC ("Google"). This information includes, but is not limited to:

- **Identifiers:** Your Internet Protocol (IP) address, unique client identifiers, and device ID.
- **Commercial Information:** Pages viewed, time spent on pages, links clicked, scrolling behavior, bounce rates, and referring websites/search terms.
- **Geolocation Data:** General location data derived from your IP address (e.g., city or region).

How We Use Your Information (Purposes)

We use Google Analytics to monitor and analyze web traffic, evaluate website performance, and improve the user experience. This data helps us understand how visitors navigate our site, which content is most popular, and how to optimize our design and functionality.

California Privacy Disclosures (Sale or Sharing)

Under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), our use of Google Analytics may be classified as the "sale" or "sharing" of your personal information (specifically identifiers and internet activity) for cross-context behavioral advertising or analytics purposes.

During the past 12 months, we have shared internet or other electronic network activity information gathered via analytics tags with Google for these operational and analytic

business purposes. We do not knowingly sell or share the personal information of consumers under 16 years of age.

Your Rights and How to Opt-Out

Opt-out rights apply to residents of all applicable U.S. states with comprehensive privacy frameworks.

If you are a California resident, you have the right to opt-out of the “sale” or “sharing” of your personal information via tracking technologies. You can exercise this choice through the following methods:

- **Our Privacy Banner:** Click the “Do Not Sell or Share My Personal Information” or “Your Privacy Choices” link located in our website footer to update your tracking preferences and disable non-essential cookies.
- **Global Privacy Control (GPC):** We automatically honor opt-out preference signals sent by your browser via the Global Privacy Control (GPC). If your browser transmits a GPC signal, our website will automatically disable Google Analytics and advertising trackers for your session.
- **Google Opt-Out Browser Add-on:** You can completely block Google Analytics from collecting your data across all websites by installing the official Google Analytics Opt-out Browser Add-on available at [google.com](https://google.com/ads/optout).

More information about the cookies on our website

Our website 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.

Essential

Essential cookies enable basic functions and are necessary for the proper function of the website.

Name	Description	Duration
wpconsent_geolocation	This cookie is used to store the consent settings based on the visitor's location.	30 days
wpconsent_preferences	This cookie is used to store the user's cookie consent preferences.	30 days

CloudFlare

CloudFlare provides web performance and security solutions, enhancing site speed and protecting against threats. [Learn more](#)

Name	Description	Duration
cf_use_ob	The cf_use_ob cookie informs Cloudflare to fetch the requested resource from the Always Online cache on the designated port. Applicable values are: 0, 80, and 443. The cf_ob_info and cf_use_ob cookies are persistent cookies that expire after 30 seconds.	session
__cfwaitingroom	The __cfwaitingroom cookie is only used to track visitors that access a waiting room enabled host and path combination for a zone. Visitors using a browser that does not accept cookies cannot visit the host and path combination while the waiting room is active.	session
cf_chl_rc_i	These cookies are for internal use which allows Cloudflare to identify production issues on clients.	session
cf_chl_rc_ni	These cookies are for internal use which allows Cloudflare to identify production issues on clients.	session

cf_chl_rc_m	These cookies are for internal use which allows Cloudflare to identify production issues on clients.	session
__cfuid	Used by the content network, Cloudflare, to identify trusted web traffic.	session
__cf_bm	Cloudflare's bot products identify and mitigate automated traffic to protect your site from bad bots. Cloudflare places the __cf_bm cookie on End User devices that access Customer sites that are protected by Bot Management or Bot Fight Mode. The __cf_bm cookie is necessary for the proper functioning of these bot solutions.	session
__cflb	When enabling session affinity with Cloudflare Load Balancer, Cloudflare sets a __cflb cookie with a unique value on the first response to the requesting client. Cloudflare routes future requests to the same origin, optimizing network resource usage. In the event of a failover, Cloudflare sets a new __cflb cookie to direct future requests to the failover pool.	session
_cfuid	The _cfuid cookie is only set when a site uses this option in a Rate Limiting Rule, and is only used to allow the Cloudflare WAF to distinguish individual users who share the same IP address.	session
cf_clearance	Whether a CAPTCHA or Javascript challenge has been solved.	session
__cfseq	Sequence rules uses cookies to track the order of requests a user has made and the time between requests and makes them available via Cloudflare Rules. This allows you to write rules that match valid or invalid sequences. The specific cookies used to validate sequences are called sequence cookies.	session

cf_ob_info	The cf_ob_info cookie provides information on: The HTTP Status Code returned by the origin web server. The Ray ID of the original failed request. The data center serving the traffic	session
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Comments

These cookies are needed for adding comments on this website.

Name	Description	Duration
comment_author	Used to track the user across multiple sessions.	Session
comment_author_email	Used to track the user across multiple sessions.	Session
comment_author_url	Used to track the user across multiple sessions.	Session

Google reCAPTCHA

Google reCAPTCHA helps protect websites from spam and abuse by verifying user interactions through challenges.

Name	Description	Duration
_GRECAPTCHA	Google reCAPTCHA sets a necessary cookie (_GRECAPTCHA) when executed for the purpose of providing its risk analysis.	179 days

Google Tag Manager

Google Tag Manager simplifies the management of marketing tags on your website without code changes.

Name	Description	Duration
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cookiePreferences	Registers cookie preferences of a user	2 years
td	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	session

Statistics

Statistics cookies collect information anonymously. This information helps us understand how visitors use our website.

Google Analytics

Google Analytics is a powerful tool that tracks and analyzes website traffic for informed marketing decisions. [Learn more](#)

Name	Description	Duration
_gali	Used by Google Analytics to determine which links on a page are being clicked	30 seconds
ga	ID used to identify users	2 years
_gid	ID used to identify users for 24 hours after last activity	24 hours
_gat	Used to monitor number of Google Analytics server requests when using Google Tag Manager	1 minute
gac	Contains information related to marketing campaigns of the user. These are shared with Google AdWords / Google Ads when the Google Ads and Google Analytics accounts are linked together.	90 days
__utma	ID used to identify users and sessions	2 years after last activity

__utmt	Used to monitor number of Google Analytics server requests	10 minutes
__utmb	Used to distinguish new sessions and visits. This cookie is set when the GA.js javascript library is loaded and there is no existing __utmb cookie. The cookie is updated every time data is sent to the Google Analytics server.	30 minutes after last activity
__utmc	Used only with old Urchin versions of Google Analytics and not with GA.js. Was used to distinguish between new sessions and visits at the end of a session.	End of session (browser)
__utmz	Contains information about the traffic source or campaign that directed user to the website. The cookie is set when the GA.js javascript is loaded and updated when data is sent to the Google Analytics server	6 months after last activity
__utmv	Contains custom information set by the web developer via the _setCustomVar method in Google Analytics. This cookie is updated every time new data is sent to the Google Analytics server.	2 years after last activity
__utmx	Used to determine whether a user is included in an A / B or Multivariate test.	18 months
_ga	ID used to identify users	2 years

Marketing

Marketing cookies are used to follow visitors to websites. The intention is to show ads that are relevant and engaging to the individual user.

Google Ads

Used by Google to store and track ad conversions across the website.

Name	Description	Duration
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_gcl_au		3 months
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LinkedIn Insight

LinkedIn Insight is a web analytics service that tracks and reports website traffic. [Learn more](#)

Name	Description	Duration
lang	Used to remember language settings.	Session
lidc	Used for routing and session management.	24 hours
liap	Used for authentication of LinkedIn members.	90 days
li_oatml	Used for identifying LinkedIn Members for advertising and analytics.	30 days
li_sugr	Used to make a probabilistic match of a user's identity.	90 days
li_fat_id	Used for member indirect identifier for conversion tracking.	30 days

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/>