



## Privacy Policy

**Effective Date: April 1, 2026**

This website privacy policy (“Privacy Policy”) applies to Advantage Partners Solutions, Inc. (“APS”), (including previous names Advantage Credit, Inc. and Partners Credit and Verification Solutions, LLC), an e-business provider of information services to the mortgage and consumer lending industries, employers, landlords, and other business customers located throughout the United States. APS is a consumer reporting agency (“CRA”), specifically a reseller, that is in the business of selling “Consumer Reports” (as defined in the Fair Credit Reporting Act (“FCRA”) (15 USC § 1681 et seq.)) and other services.

This Privacy Policy describes how APS collects, uses, maintains, shares, and protects personal information on its website, [www.advps.com](http://www.advps.com), as well as its legacy websites [www.advcredit.com](http://www.advcredit.com) and [www.partnerscredit.com](http://www.partnerscredit.com) (collectively, “APS websites”). APS collects and uses personal information for legitimate business purposes only, and this Privacy Policy is designed to continue to protect the privacy rights of both customers and consumers.

APS regularly assesses, manages, and controls risks relating to the security and confidentiality of the information obtained through the general course of business. APS has physical and electronic controls in place to protect the information against unauthorized access or use. Access to consumer information is restricted to employees who need the information in order to perform their job duties.

Through your use of the APS websites, you consent to the practices described in this Privacy Policy. **If you do not agree with the terms of this Privacy Policy, please discontinue your access or use of the APS websites immediately.**

APS may update this Privacy Policy from time to time by posting the updated terms on its websites. If you use the websites after APS has updated this Privacy Policy, you acknowledge that you have read the updated terms and consent to APS’s privacy practices.

### **1. Applicable Law and Legal Exemptions**

APS is subject to FCRA, the Gramm-Leach-Bliley Act (“GLBA”), and their corresponding regulations, as well as applicable state laws and regulations (“Applicable Law”). In accordance with the requirements of Applicable Law, APS does not disclose, either directly or indirectly, to any person, firm or corporation, information of any kind, nature or description concerning matters affecting or relating to the business of its customers or consumers unless the information is already in the public domain or disclosure is permitted by Applicable Law. Some examples include a permissible purpose under the FCRA, for fraud prevention, or by court order.

APS engages in activities as a regulated CRA, specifically as a reseller, pursuant to the FCRA. APS does not maintain a database of assembled or merged information from which new consumer reports are produced. Accordingly, the information maintained by APS is exempt from state data privacy laws and regulations.



## 2. **Security**

APS websites have security measures in place to protect against loss, misuse, and alteration of the information under APS control, including the following:

- 128-bit SSL encryption.
- Two-factor authentication.
- TruSecure certified firewall protection.
- TruSecure Web Certification.

## 3. **Online Information Collected and Stored for Business Purposes**

APS collects information from visitors of its websites, including the domain names, Internet Protocol ("IP) and Media Access Control ("MAC") addresses, browser types, and unique device identifiers of such visitors. This information includes the number of visits, average time spent on the website, pages viewed, and similar information. This information may also include usage information about the page-by-page paths you take as you browse through the websites. APS uses this information for a number of purposes, such as investigating security incidents, running analytics to understand usage, and for compliance with security standards. For more information regarding APS's use of this information, please see the *Tracking Technologies and Analytics* section below. APS may combine such information with information provided by you.

## 4. **Tracking Technologies and Analytics**

APS websites may utilize the following tracking technologies and analytics.

- Cookies
  - A cookie is an element of data that an Internet site can send to your browser and is stored on your computer. APS uses cookies to house data which is used to authenticate user terminal access to its secure sites, measure website activity, and collect information such as browser type and other information about your visit to the websites. Cookies are also used to prefill information previously entered into forms and to customize information to your personal tastes. APS may share information about you that it collects through a cookie with third parties who help APS analyze website data, in accordance with Applicable Law. APS is not responsible for the privacy policies or practices of any third-party sites, and APS encourages all consumers to visit their respective privacy policies. APS uses the following types of cookies:
    - Strictly necessary cookies: Essential to enable the user to navigate the website securely and to provide the user with services they have specifically requested.
    - Functionality cookies: Enhance the functionality of the websites by storing user preferences. For instance, they can remember your name and location, if you provide this information, and the types of content for which you are interested.
    - Performance cookies: Improve the performance of the websites. For instance, they help pages load quicker.
    - Analytics cookies: APS may use third-party analytics services such as Google Analytics and others. Your IP address and other information will be collected by automated means to report on your use of the services.
  - If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. If, however, you do not accept APS websites cookies, you may experience some inconvenience in your use of the websites.



- Web Beacons. APS may include small graphic images called web beacons, also known as "Internet tags" or "clear gifs," in its web pages and email messages. APS may use web beacons or similar technologies for a number of purposes, including, without limitation, to count the number of visitors to the websites.
- Embedded Scripts. APS may use embedded scripts on its websites. An embedded script is programming code that is designed to collect information about your interactions with the website. It is temporarily downloaded onto your computer from APS's web server or a third party with whom APS works, is active only while you are connected to the website, and is deleted or deactivated thereafter.
- Do Not Track Signals: APS may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they "do not track" your online activities. At this time, APS does not honor such signals, and APS does not modify what information APS collects or how APS uses that information based on whether such a signal is broadcast or received by APS.
- Analytics: APS may use third-party analytics service providers, including but not limited to Google Analytics, to evaluate and provide APS with information about the use of APS websites. These third parties use cookies, web beacons, pixels, embedded scripts and other, similar technologies to automatically collect information about your website use, report website trends, and help APS compile website metrics. You can learn about Google's specific practices by visiting [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).
- Advertising. APS may use Google Analytics Advertising Features with Google Signals, which includes Remarketing with Google Analytics, Google Display Network Impression Reporting, and Google Analytics Demographics and Interests Reporting to advertise online. Google Signals provides insight into cross-device user journeys and allows APS to remarket to signed-in Google users across devices. Websites and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to a website.

## **5. Customer Account Information**

APS uses customer account information in the following ways:

- To contact the customer when necessary.
- For billing purposes and for the collection of past-due accounts.
- For marketing purposes.

## **6. Data Retention**

APS may store your information for as long as it is required for our business purposes or Applicable Law, including the period after which any customer relationship has ceased. At the end of its retention lifecycle, personal information is destroyed or otherwise rendered inaccessible. APS takes reasonable measures to protect against unauthorized access to or use of consumer information in connection with its disposal of personal information.



## 7. **Third-Party Websites**

APS websites may contain links to other third-party websites. APS is not responsible for the privacy practices or the content of such third-party websites.

This Privacy Policy covers only data collected through APS websites and not any other data collection or processing, including, without limitation, data collection practices of other websites to which this website links or data that APS or APS's subsidiaries or affiliates collect offline, or through websites, products, or services that do not display a direct link to this Privacy Policy.

## 8. **Privacy of Children**

Children Under the Age of 13. This website is not directed to children under the age of 13, and APS does not knowingly collect or use personally identifiable information from anyone under 13 years of age. Children under 13 are expressly prohibited from submitting any personal information to APS, and if APS discovers that it has inadvertently gathered any such information from a child under 13, APS will take appropriate steps to delete it.

## 9. **Questions**

If you have any questions about this Privacy Policy or this website, please contact [support@advps.com](mailto:support@advps.com).

## 10. **California Residents**

### **California Consumer Privacy Act ("CCPA") Compliance Notice**

Advantage Partners Solutions, Inc. ("APS", "we" or "us") understands the importance of protecting non-public information of our customers and consumers. After reviewing our data and data practices and consulting with privacy law counsel, we have concluded that only as where applicable, APS complies with the CCPA. ("Our Limited CCPA Obligations"):

- To maintain reasonable security of the personal information of Californians that we collect and process; and
- To comply with the CCPA's obligations applicable to service providers as defined by the CCPA.

We do not have full CCPA obligations to California consumers as of the Effective Date because:

- **Data That Is Processed in Our Capacity as a Service Provider.** When we process consumer personal information as a service provider for another business, that business, not us, is the owner and controller of the personal information and responsible for California Consumer Request Rights related to that data. If you want to inquire about personal information we process for our clients as their service provider, you should contact those entities directly. Due to confidentiality considerations, we do not disclose or confirm the identity of our clients or what data we process for them.
- **Data That Is Regulated and Protected by Other Laws.** The CCPA recognizes that other privacy laws already exist to protect certain types of personal information under certain circumstances. We are subject to and comply with several of these laws, including the federal Fair Credit Reporting Act ("FCRA"), the federal Gramm-Leach-Bliley Act ("GLBA"), the Driver's Privacy Protection Act of 1994 ("DPPA"), and the California Financial Information Privacy Act ("FIPA"). The CCPA exempts personal information that



is already regulated and protected by those laws, and we apply our obligations under those laws to that data.

- Data That Is Publicly Available. The CCPA exempts personal information that is lawfully made available from federal, state, or local government records.
- Data That Is Deidentified or Aggregated. The CCPA does not consider deidentified or aggregated data to be personal information.
- We provide business-to-business (B2B) products and services and do not offer products or services directly to consumers.
- When we do collect and process personal information from or about consumers, we have determined it is in one of the following contexts. The CCPA exempts each context from any obligations beyond Our Limited CCPA Obligations:
  - Personal information collected, processed, sold, or disclosed pursuant to the FCRA.
  - Personal information collected, processed, sold, or disclosed pursuant to the GLBA.
  - Public records information.

For more information on how we collect and process personal information via our online services, see the privacy notices and policies posted on those services.

### **California Privacy Addendum**

**Effective Date: April 1, 2026**

This California Privacy Addendum describes APS’s collection and use of personal information and supplements the information contained in our website Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), when applicable, and any terms defined in the CCPA have the same meaning when used in this notice.

**This California Privacy Addendum does not apply to personal information contained within a consumer report that is governed pursuant to the Fair Credit Reporting Act (“FCRA”) and the Gramm-Leach-Bliley Act (“GLBA”).**

#### **Information We Will Collect**

Our websites collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, our websites collect, and over the prior twelve (12) months have collected, the following categories of personal information from consumers:

<b>Category</b>	<b>Applicable Pieces of Personal Information Collected</b>
<b>A. Identifiers.</b>	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.



<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name, address, and telephone number. Some personal information included in this category may overlap with other categories.
<b>C. Protected classification characteristics under California or federal law.</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
<b>D. Commercial information.</b>	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
<b>E. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement may be collected through cookies on APS websites.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as personal information covered by certain sector-specific privacy laws, including the FCRA, the GLBA, or California Financial Information Privacy Act ("FIPA"), and the Driver's Privacy Protection Act of 1994 ("DPPA"). We may collect all or some of this information, but it is not in the scope of this California Privacy Addendum.

**Use of Personal Information**

We may use, "sell" for monetary *or other valuable consideration*, or disclose the personal information we collect and, over the prior twelve (12) months, have used, "sold" for monetary *or other valuable consideration*, or disclosed the personal information we have collected, for one or more of the business or commercial purposes described in the body of our Privacy Policy. For purposes of this paragraph, the use of analytics and advertising cookies may be considered a sale of personal information.

APS will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.



### **Sources of Personal Information**

APS obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our websites.
- Your Community Owner. For example, your address and other information about you and the community in which you reside.

### **Sharing Personal Information**

APS may disclose your personal information to a third party for a business purpose or sell your personal information for monetary *or other valuable consideration*, subject to your right to opt-out of those sales (see *Opt-Out and Opt-In Rights Regarding the "Sale" of Your Personal Information*). When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

### ***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, APS has disclosed the following categories of personal information for a business purpose to the listed categories of third parties:

- Identifiers:
  - Categories of Third Parties: Service Providers, and affiliates of APS.
- California Customer Records personal information categories:
  - Categories of Third Parties: Service Providers and affiliates of APS.
- Commercial information:
  - Categories of Third Parties: Service Providers and affiliates of APS.
- Internet or other similar network activity:
  - Categories of Third Parties: Internet cookie information recipients, such as analytics and behavioral advertising services.

### ***Sales of Personal Information***

As noted in our general Privacy Policy, we do not sell your personal information as the term "sell" is commonly understood to require an exchange for money. However, the California State Attorney General may issue guidance on whether the use of advertising and analytics cookies on our websites may be considered a "sale" of personal information as the term "sale" is broadly defined in the CCPA to include both monetary *and other valuable consideration*. Until such guidance has been issued, we continue to consider it a "sale" in order to be as transparent as possible with users of our websites and will comply with the restrictions of the "sale" of this information to the extent technologically feasible. This "sale" would be limited to our use of third-party advertising and analytics cookies and their use in providing you behavioral advertising and their use in understanding how people use and interact with the websites.

In the preceding twelve (12) months, APS has "sold" the following categories of personal information to the following categories of third parties for monetary *or other valuable consideration*:

- Internet or other similar network activity:



- Categories of Third Parties: Internet cookie information recipients, such as analytics and behavioral advertising services.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights. You may exercise these rights yourself or through your authorized agent.

### ***Authorized Agents***

You may authorize your agent to exercise your rights under the CCPA on your behalf by registering your agent with the California Secretary of State. You may also provide your authorized agent with power of attorney to exercise your rights. If you authorize an agent, we may require that your agent provide proof that they have been authorized exercise your rights on your behalf. We may request that your authorized agent submit proof of identity. We may deny a request from your agent to exercise your rights on your behalf if they fail to submit adequate proof of identity or adequate proof that they have the authority to exercise your rights.

### ***Access to Specific Information and Data Portability Rights***

You have the right to request that APS disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request). We will not disclose your social security number, driver's license number or other government-issued identification number. We will also not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to your personal information, or the security of our systems or networks.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased; and
  - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide access and data portability rights for B2B personal information.



### ***Deletion Request Rights***

You have the right to request that APS delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if the information is collected, used, or retained pursuant to the FCRA or GLBA, or retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for B2B personal information.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request by emailing us at [support@advps.com](mailto:support@advps.com).

Only you, or your agent that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, see above. We may request additional information so we may confirm a request to delete your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

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



We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see *Opt-Out and Opt-In Rights Regarding the "Sale" of Your Personal Information*.

***Response Timing and Format***

We will respond to a verifiable consumer request within ten (10) days of its receipt. We will generally process these requests within forty-five (45) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, 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 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 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.

***Opt-Out and Opt-In Rights Regarding the "Sale" of Your Personal Information***

You have the right to direct us to not sell your personal information at any time (the "right to opt-out"). To exercise the right to opt-out, you (or your authorized representative) may adjust your cookie preferences by setting your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you do not consent to our use of cookies or select this setting you may be unable to access certain parts of our websites or other websites. You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).



### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Other California Privacy Rights**

California Shine the Light Law. California Civil Code Section 1798.83 (California's "Shine the Light" law) permits users of our websites that are California residents and who provide personal information in obtaining products and services for personal, family, or household use to request certain information regarding our disclosure of personal information to third parties for their own direct marketing purposes. If applicable, this information would include the categories of personal information and the names and addresses of those businesses with which we shared your personal information with for the immediately prior calendar year (e.g. requests made this year will receive information regarding such activities for last year). You may request this information once per calendar year. To make such a request, please send an email to [support@advps.com](mailto:support@advps.com). APS does not currently disclose your personal information to third parties for their own direct marketing purposes.

California Investigative Consumer Reporting Agencies Act. APS's privacy practices with respect to its preparation and processing of investigative consumer reports follow APS's obligations pursuant to the FCRA, including the fact that APS does not provide a consumer's personal information to any entity unless that entity has certified its permissible purpose pursuant to the FCRA.

Personal Information Disclosure: United States or Overseas. APS provides information to its subsidiaries, affiliated companies, and other businesses or persons for the purposes of processing such information on its behalf, some or all of which may store your information on secure servers located inside or outside of the United States. APS requires that all of its third-party providers maintain appropriate physical, electronic, and procedural safeguards that are at least as secure as APS's Privacy Policy.

- Contact information for an APS representative who can assist a consumer with additional information regarding APS's privacy practices or policies in the event of a compromise of his or her information:

Advantage Partners Solutions  
Mailing Address: 144 Railroad Ave, Suite 218, Edmonds, WA 98020  
Email: [support@advps.com](mailto:support@advps.com)  
Telephone: (888) 895-5145



**Changes to Our Privacy Notice**

APS reserves the right to amend this California Privacy Addendum at our discretion and at any time. When we make changes to this California Privacy Addendum, we will post the updated notice on our website and update the notice's effective date. **Your continued use of our websites following the posting of changes constitutes your acceptance of such changes.**

**Contact Information**

If you have any questions or comments about this notice, the ways in which APS collects and uses your information described above or in the website Privacy Policy your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at the contact information provided in the Privacy Policy.