

UNITED FINANCIAL MANAGEMENT SYSTEMS, INC.

PRIVACY POLICY

Effective Date: July 1, 2025 | Last Updated: July 1, 2025

IMPORTANT NOTICE: This is a communication from a debt collector. Any information obtained will be used for that purpose. This Privacy Policy applies to United Financial Management Systems, Inc. ("UFMS"), Customer Service Center, Inc. ("CSC"), and United We Collect ("UWC").

1. INTRODUCTION

United Financial Management Systems, Inc. ("UFMS," "we," "our," or "us") is a full-service accounts receivable management and financial services company headquartered in Lake Mary, Florida. We are committed to protecting the privacy and security of all personal information we collect, use, and maintain in the course of providing billing support, self-pay account management, and debt recovery services.

This Privacy Policy explains how we collect, use, disclose, and safeguard personal information in connection with our services. It applies to all individuals whose information we process, including patients, consumers, clients, and users of our websites, portals, and digital services.

By using our services or providing us with your personal information, you acknowledge that you have read and understood this Privacy Policy.

2. INFORMATION WE COLLECT

We collect personal information necessary to provide billing, account resolution, and recovery services. The types of information we may collect include:

2.1 Personal Identification Information

- Full legal name
- Date of birth
- Social Security Number (where legally required for account identification or credit reporting)
- Government-issued identification numbers
- Employer information

2.2 Contact Information

- Home, work, and mailing addresses
- Telephone numbers (home, mobile, and work)
- Email addresses

2.3 Financial Information

- Account balances and payment history
- Banking and payment information when provided for payment processing
- Insurance carrier information and policy details
- Claims and billing data

2.4 Healthcare and Medical Information

- Dates of service and provider information
- Insurance eligibility and coverage details
- Medical billing codes (CPT, ICD) where applicable to billing and claims processing
- Patient account information provided by our healthcare clients

2.5 Account Activity Information

- Communication history (phone calls, letters, emails, text messages)
- Payment arrangements and payment plan history
- Dispute and resolution records

2.6 Technical and Digital Information

- IP addresses and device identifiers when accessing our consumer portals
- Browser type and operating system
- Pages visited and time spent on our online portals
- Login credentials for our secure client and consumer portals

3. HOW WE COLLECT INFORMATION

We collect personal information from the following sources:

- Directly from our clients (healthcare providers, businesses, and other organizations) who place accounts with us for billing or collection services
- Directly from consumers and patients in the course of communications regarding accounts
- From consumer-provided information submitted through our online payment portals or written correspondence
- From third-party data providers used for skip tracing and account verification, including LexisNexis, Accurant, and First Alert databases
- From public records, including bankruptcy filings (via Banko and PACER), workers' compensation records (via OJCC), and court records
- From insurance verification services, including Medicare/Medicaid data mining, SPOT MBI lookups, Change Healthcare, and Availity
- From the National Change of Address (NCOA) database for address verification and updates

4. HOW WE USE YOUR INFORMATION

We use personal information solely for lawful purposes directly related to our services, including:

- Providing billing support, patient account resolution, and accounts receivable management services on behalf of our clients
- Communicating with consumers regarding outstanding account balances, billing questions, and payment options
- Processing and applying payments to accounts
- Verifying identity and confirming account ownership
- Investigating and resolving billing disputes
- Verifying insurance eligibility and submitting claims to insurance carriers
- Performing skip tracing and address/telephone verification for account contact purposes
- Reporting account information to consumer reporting agencies in accordance with the Fair Credit Reporting Act (FCRA) and applicable CFPB regulations
- Complying with all applicable federal, state, and local laws, regulations, and legal processes
- Maintaining internal audit records and compliance documentation
- Improving our services and internal operations

5. LEGAL BASIS FOR PROCESSING

UFMS collects and processes personal information under the following legal authorities:

- Performance of services under contracts with our clients (healthcare providers and other organizations)
- Compliance with applicable federal and state laws, including the Fair Debt Collection Practices Act (FDCPA), the Fair Credit Reporting Act (FCRA), the Health Insurance Portability and Accountability Act (HIPAA), the Gramm-Leach-Bliley Act (GLBA), the Telephone Consumer Protection Act (TCPA), the CAN-SPAM Act, and Consumer Financial Protection Bureau (CFPB) regulations, including Regulation F
- Legitimate business interests in providing billing and recovery services
- Consent, where required by law, for certain electronic communications

6. DISCLOSURE OF INFORMATION

We do not sell, rent, or trade personal information. We may share personal information only in the following limited circumstances:

6.1 With Our Clients

We share account status, payment, and resolution information with the client organization that placed the account with us, as required to fulfill our contractual obligations.

6.2 With Consumer Reporting Agencies

We may report account information to credit bureaus in accordance with the FCRA and current CFPB guidelines, including mandatory holding periods and minimum balance requirements for healthcare debts.

6.3 With Service Providers

We may share information with carefully selected third-party service providers who assist us in delivering our services, including payment processors, data verification services, clearinghouses, and technology providers. All such providers are contractually required to protect information and use it only for the services they provide to us.

6.4 As Required by Law

We may disclose information when required by law, court order, subpoena, regulatory authority, or other legal process, or when we believe disclosure is necessary to protect our rights, your safety, or the safety of others.

6.5 Business Transfers

In the event of a merger, acquisition, or sale of assets, personal information may be transferred as part of the transaction, subject to applicable legal requirements and continued privacy protections.

7. HIPAA COMPLIANCE

To the extent that UFMS receives and processes Protected Health Information (PHI) on behalf of covered healthcare entities, we operate as a Business Associate as defined under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH). We maintain appropriate Business Associate Agreements (BAAs) with all applicable covered entity clients and implement the required administrative, physical, and technical safeguards to protect PHI. PHI is used solely to the minimum extent necessary to perform the billing and account management services for which it was provided.

8. COMMUNICATIONS AND TELEPHONE CONSENT

By providing contact information, consumers may be contacted via telephone, text message, email, or written correspondence in connection with their accounts. All communications are conducted in compliance with:

- The Fair Debt Collection Practices Act (FDCPA)
- CFPB Regulation F, including Limited-Content Message requirements and call frequency restrictions
- The Telephone Consumer Protection Act (TCPA), including requirements for consent to receive certain automated or pre-recorded messages
- The CAN-SPAM Act for commercial email communications

Consumers may request limitations on certain types of communication as permitted by law. Please contact us using the information in Section 13 to make such a request.

9. CREDIT REPORTING

UFMS is a furnisher of information to consumer reporting agencies and complies fully with the Fair Credit Reporting Act (FCRA). We report only accurate information and maintain procedures to investigate and correct disputed information in a timely manner.

In accordance with current CFPB regulations, medical debt accounts are subject to the following requirements before reporting to consumer reporting agencies:

- A mandatory hold period of one (1) full year from the first date of delinquency before a medical debt balance may be reported to a consumer's credit report
- Minimum balance thresholds established by consumer reporting agencies must be met for an account to be reportable

We continuously monitor regulatory updates from the CFPB and consumer reporting agencies and update our compliance practices accordingly.

10. DATA SECURITY

UFMS implements industry-standard administrative, technical, and physical security safeguards designed to protect personal information from unauthorized access, disclosure, alteration, or destruction. Our security measures include:

- Encryption of data in transit and at rest
- Role-based access controls limiting information access to authorized personnel
- Secure client and consumer portals with login authentication
- Regular security assessments and staff training
- Incident response procedures

While we take reasonable precautions to protect your information, no data transmission or storage system can be guaranteed to be 100% secure. In the event of a data breach that requires notification under applicable law, we will notify affected individuals and regulatory authorities as required.

11. YOUR RIGHTS

Depending on applicable law, you may have the following rights with respect to your personal information:

- The right to request access to personal information we hold about you
- The right to request correction of inaccurate information
- The right to dispute information reported to consumer reporting agencies (subject to FCRA dispute procedures)
- The right to request restrictions on certain types of communication as provided by law
- The right to opt out of certain electronic communications

To exercise your rights, please contact us using the information in Section 13 below. We will respond to requests within the timeframes required by applicable law. Please note that certain information cannot be deleted or restricted if required for legal, regulatory, or contractual purposes.

12. RETENTION OF INFORMATION

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, to comply with legal obligations, to resolve disputes, and to enforce our agreements. Retention periods are determined by applicable law, regulatory requirements, and our contractual obligations with clients.

13. CONTACT INFORMATION

For questions, concerns, or requests related to this Privacy Policy, please contact us at:

United Financial Management Systems, Inc.

P.O. Box 954029

Lake Mary, FL 32795-4029

Phone: (407) 833-8900 | Toll-Free: (866) 912-2455

Email: info@go-ufms.com

Hours: Monday – Friday, 8:30 AM – 7:00 PM EST

14. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this Privacy Policy at any time to reflect changes in our practices, services, or applicable law. When we make material changes, we will update the "Last Updated" date at the top of this policy and post the revised policy on our website. Your continued use of our services after the effective date of any changes constitutes your acknowledgment of the updated Privacy Policy.

15. GOVERNING LAW

This Privacy Policy is governed by the laws of the State of Florida and applicable federal law. Any disputes relating to this Privacy Policy shall be resolved in accordance with applicable law in the State of Florida.

This Privacy Policy does not constitute legal advice. Individuals with specific legal questions regarding their rights should consult an attorney.

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