

Privacy Policy

This Privacy Policy describes how Integrated Financial Settlements, Inc., and its subsidiaries Arcadia Settlements Group, Inc., JMW Settlements, LLC, Assura Trust Company, and Structures, LLC (collectively, "we," "us," or "our") collects, uses, shares, and protects personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions.

If you are in Canada, please note that by using our website, or otherwise providing information to us, you consent to our collection, use, and disclosure of your information in accordance with this Privacy Policy. If you do not consent to such collection, use, and disclosure, you must discontinue your use of our website.

Information We Collect

We collect information about you in a variety of ways depending on how you interact with us and our websites, mobile applications, products, and services, including:

- Directly from you when you provide it to us, such as when you register for an account and sign in to your account, request a settlement proposal, search for a consultant, sign up to receive communications from us, use our structured settlement consulting and/or planning services, or contact us by phone, by email, through our web form(s), or otherwise.
- Automatically through the use of cookies, server logs, and other similar technologies when you interact with our websites, mobile applications, and emails.
- From other sources, including, for example, our affiliates, business partners, service providers, and other third parties, or from publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

The following provides examples of the type of information that we collect in a variety of contexts and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration	We collect your name and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We use this information to provide account-related functionalities to our users. Accounts can be used to communicate with our consultants and to save your preferences and transaction history.
Plaintiff / Claimant Information	We may collect the name, email address, home or business address, and bank account or other financial information of injured plaintiffs and other	We collect this information to match plaintiffs/claimants with a consultant, to communicate with them

	claimants seeking structured settlement services and their representatives (e.g., family members or attorneys seeking structured settlement services on a plaintiff's/claimant's behalf). We may also collect the name of such plaintiffs' and claimants' insurance company, their health information, their genetic information, their gender, and their location.	and/or their representatives concerning normal business administration such as structured settlement payments and strategies, and to provide our structured settlement services.
Vendor and Business Contact Information	We may collect information about the employees of companies with whom we do business, including name, email address, and mailing address.	We collect this information to contact our vendors and their employees to communicate with them concerning normal business administration, such as settlement payments, services, and billing, and to otherwise provide our services to plaintiffs/claimants.
Cookies and First-Party Tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a website is viewed.	We use cookies to ensure that our websites operate efficiently and to customize our websites to match your personal preferences.
Cookies and Third-Party Tracking	We may place tracking technology on our website that collects analytics or records how you interact with our website. This means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can, for example, report analytics to us.	We collect this information to analyze how our websites are being accessed and used, and to improve user experience and the overall quality of our websites.
Location Information	When you visit our website from your mobile device, we collect your location from the GPS, Wi-Fi, and/or cellular technology in your device.	We collect this information to better understand who is using our services.
Email Interconnectivity	If you receive email from us, we use certain tools to capture	We collect this information to

	data related to when you open our message or click on any links or banners it contains.	understand how you interact with our communications to you.
Job Applicants	If you apply for a job posting, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your government ID. Providing this information is required for employment.	We collect this information to make employment-related decisions (e.g., hiring for new positions). If you become an employee, you will receive a separate privacy notice that describes how we collect, use, and share information about our employees.
Inquiries, Comments, Feedback, and Support	If you provide us feedback or contact us for support or for inquiries regarding potential or current structured settlement services, we will collect your name and email address, as well as any other content that you send to us, in order to reply.	We collect this information to follow up on your comments, inquiries, and other requests.
Mailing List	When you sign up for one of our mailing lists, we collect your email address or postal address.	We collect this data to share information about our services with individuals who ask for it or who are already existing clients using our services.
Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website	We collect this information to identify users and to understand how they interact with us on their mobile devices.
Public Health and Safety	In certain situations where a serious public health threat has been identified, we may collect information from plaintiffs/ claimants and other individuals accessing our facilities. This may include medical and health information, such as body temperature, symptoms, and underlying health conditions.	We collect this information to protect the health and safety of our clients and visitors. In some jurisdictions, we may be required by law, regulation, or governmental order to collect and retain information related to

		issues of public health and safety.
Surveys	When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We collect this information to understand your opinions and collect information relevant to our organization.
Website Interactions	We use technology to monitor how you interact with our websites. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We collect this information to understand how you interact with our websites to better improve them. We also collect this information to detect and prevent fraud.
Web Logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the internet is used), domain name, click-activity, referring website, and/or a date/time stamp for your visit.	We collect this information to monitor our networks and the visitors to our websites. Among other things, it helps us understand which of our services are the most popular.

If you are located in Canada, our lawful basis for processing your data is generally consent. If you would like specific information about our lawful basis of processing, please contact us as indicated in the "Contact Us" section.

Some jurisdictions require that we describe the categories of personal information we collect, disclose for a business purpose, and share with third parties. Please note that, in addition to the recipients identified below, we may disclose any of the categories of personal information we collect with our affiliates and subsidiaries, government entities, as may be needed to comply with law or prevent illegal activity, and professional services organizations (such as auditors and law firms). We do not sell your personal information nor do we use cookies and similar tracking technologies for purposes of targeted advertising.

Category of Personal Information	Category of Recipients to Whom We Disclose Data for a Business Purpose
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<p>Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Business partners • Data analytics providers • Internet service providers • Operating systems and platforms • Other service providers • Payment processors and financial institutions
<p>Government-Issued Identification – this may include social security number, driver’s license number, state issued identification number, or passport number.</p> <p>Financial Information – this may include bank account number and other financial information.</p> <p>Health Related Information – this may include medical information, mental or physical condition or treatment, or health insurance information.</p> <p>Characteristics of Protected Classifications – this may include age, sex, race, ethnicity, physical, or mental handicap, etc.</p> <p>Additional Categories of Personal Information Described in the California Customer Records Statute – this may include signature, physical characteristics, or description, insurance policy number.</p>	<ul style="list-style-type: none"> • Other service providers • Payment processors and financial institutions
<p>Commercial Information – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Data analytics providers • Other service providers • Payment processors and financial institutions
<p>Internet or Other Electronic Network Activity Information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website or application.</p> <p>Geolocation Data</p> <p>Inferences Drawn from Any of the Information Listed Above</p>	<ul style="list-style-type: none"> • Data analytics providers • Other service providers
<p>Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information</p>	<ul style="list-style-type: none"> • Other service providers

We collect the following categories of sensitive personal information: account log-in, financial account number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; information concerning health; information concerning sex life or sexual orientation; and genetic data. This information is collected in order to process transactions, comply with laws, manage our business, or provide you with products and services. Note that we do not use such information for any purposes that are not identified within California Privacy Rights Act Section 1798.121.

How We Use Information

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites.
- To provide and improve our structured settlement services.
- To improve our services and product offerings.
- To conduct analytics.
- To communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback.
- To send marketing and promotional materials, including information relating to our products, services, or promotions, or those of our business partners.
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violation of our policies and terms and conditions, security incidents, and harm to the rights, property, or safety of our company and our users, employees, or others.
- To debug, identify and repair errors that impair existing intended functionality of our website and services.
- To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against legal claims.
- For internal administrative purposes, as well as to manage our relationships.
- For such other purposes as you may consent (from time to time).

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose.

To the extent we maintain and use personal information in a deidentified form, we will not attempt to reidentify the information, except for the purpose of determining whether our deidentification processes satisfy our legal obligations.

How We Share Information

In addition to the specific situations discussed elsewhere in this Privacy Policy, we may disclose personal information in the following situations:

- **Affiliates and Acquisitions.** We may share information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common

control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.

- **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of services by a third-party intermediary.
- **Service Providers.** We may share your information with service providers. Among other things, service providers may help us to administer our website, provide technical support, and process payments.
- **Other Disclosures with Your Consent.** We may disclose your information to other third parties when we have your consent or direction to do so.
- **Financial Institutions.** We may share your information with financial institutions for purposes of providing structured settlement services.

Your Choices

Some jurisdictions give you a right to make the following choices regarding your personal information:

- **Access To Your Personal Information.** You may request access to your personal information or confirmation that we have and/or process information about you. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
- **Changes To Your Personal Information.** We rely on you to update and correct your personal information. You may ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Deletion Of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another business purposes.
- **Online Tracking.** We do not currently recognize the "Do Not Track" signal.
- **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive. If you decide not to receive promotional emails, we may still send you service-related communications.
- **Revocation Of Consent.** Where we process your personal information based upon consent, you may revoke consent. Please note, if you revoke your consent for the processing of personal information, then we may no longer be able to provide you services.
- **California Shine the Light.** If you are a California resident and would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information below.

Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. We will not discriminate against individuals who exercise their privacy rights under applicable law.

Submitting Requests

You may exercise the rights described above through our online portal or by contacting us as indicated in the Contact Information section below. If you disagree with our denial of a request, you may appeal our decision by contacting us with the subject line "Appeal."

Note that, as required by law, we will require you to prove your identity. We may verify your identity by phone call or email. Depending on your request, we will ask for information such as your name or the date of your last communication with us. We may also ask you to provide a signed declaration confirming your identity or a government ID, depending on the sensitivity of the data you are requesting. Following a request, we will use reasonable efforts to supply, correct, or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of a completed and notarized Authorized Agent Designation Form indicating that you are able to act on another person's behalf.

How We Protect and Retain Information

No method of transmission over the internet, or method of electronic storage, is fully secure. We maintain internal governance policies designed to protect your information. These governance policies include, but are not limited to, Written Information Security Protocols, Incident Response Plans, Data Subject Request Protocols, and Record Retention and Destruction Policies. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites contain account functionality. You are responsible for maintaining the confidentiality of your account password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

We retain your personal information for only as long as necessary to fulfill the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we obtained the information and whether we can achieve those purposes through other means, as well as applicable legal requirements.

Transmission Of Information To Other Countries, States, and Provinces

As a multi-national company, we transmit information between and among our affiliates. As a result, your information may be transferred to and processed in a foreign country, state, or province, including transfers of information out of Quebec.

Third-Party Applications/Websites

For your convenience, we may provide links to websites and other third-party content or services that we do not own or operate. The websites and third-party content to which we link may have separate privacy notices or policies. Please note, we have no control over the privacy practices websites, or services that we do not own. We encourage you to review the privacy policies of any third-party website or application for details about such third party's privacy practices.

Changes To This Privacy Policy

We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an "effective" and "last updated" date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified. If we make a material change to our privacy notice, we will attempt to notify you through email or through a website pop-up.

Website-Specific Provisions

This Privacy Policy applies to all our websites, including teamarcadia.com and any other websites operated by us. If you create an account, use our services, or interact with our websites in any way, we collect and process data in accordance with this policy. Any additional services or features introduced on our websites will adhere to these privacy standards, and any material changes will be updated accordingly.

Enhanced Cookies & Tracking Disclosure

We use cookies and similar tracking technologies to enhance user experience, analyze website traffic, and personalize content. By using our websites, you consent to the collection and use of cookies. You can manage or disable cookies through your browser settings or opt out of certain tracking mechanisms.

Types of Cookies We Use:

- Essential Cookies: Necessary for website functionality.
- Performance & Analytics Cookies: Help us analyze website usage and improve our services.
- Advertising & Targeting Cookies: Used by third-party services to provide relevant advertisements.
- Functional Cookies: Remember user preferences for a personalized experience.

For more information on managing cookies, please visit our Cookie Policy page.

Third-Party Integrations

We use third-party tools, services, and plugins to enhance our websites, including but not limited to:

- Google Analytics for website traffic analysis
- Marketing platforms for email subscriptions and targeted promotions
- Social media plugins (e.g., Facebook, LinkedIn, Twitter)
- Embedded content (e.g., YouTube videos, third-party forms)

These third-party services may collect data in accordance with their own privacy policies. We recommend reviewing their policies for further details on how they process your data.

GDPR Compliance (for EU Users)

If you are a resident of the European Economic Area (EEA), we process your personal information under the following legal bases:

- Consent: When you provide consent (e.g., subscribing to a newsletter).
- Contractual Necessity: When data processing is required to fulfill a contract (e.g., account registration, service transactions).
- Legal Obligation: When we are required to comply with legal or regulatory requirements.
- Legitimate Interest: For purposes such as improving services, marketing, fraud prevention, and network security.

GDPR Rights:

EEA residents have the right to:

- Access their personal data
- Correct inaccuracies
- Request deletion (right to be forgotten)
- Restrict processing
- Object to certain processing activities
- Request data portability

To exercise your rights, contact us at [see Contact Information below].

Children's Privacy (COPPA Compliance)

Our websites are not intended for children under 13 (or 16 in certain jurisdictions). We do not knowingly collect personal data from minors. If we become aware that we have collected data from a child without proper consent, we will immediately delete such information. If you believe we have collected information from a child, please contact us at [see Contact Information below].

Contact Information

If you have any questions, comments, or complaints concerning our privacy practices, or if you need to access this Privacy Policy in an alternative format due to having a disability, please contact the individual accountable for our privacy practices and policies at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

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