

ZYRA FINANCIAL LLC

Privacy Policy

Effective Date: May 16, 2026 | Last Updated: May 16, 2026

Zyra Financial LLC ("Zyra Financial," "we," "us," or "our") respects your privacy and is committed to protecting the personal information you share with us. This Privacy Policy explains what information we collect, how we use and protect it, when and with whom we share it, and the choices and rights you have regarding your information.

Zyra Financial is a passive consumer debt purchaser. We acquire portfolios of consumer receivables from creditors and other portfolio holders, and we engage licensed third-party servicing companies to manage all consumer-facing communications and account resolutions on our behalf. This Privacy Policy applies to information we collect through our website at <https://zyrafinancial.com>, through our business communications, and in connection with the consumer accounts we own.

Please read this Privacy Policy carefully. By using the Site or submitting information to us, you acknowledge that you have read and understood this Policy.

1. Scope of This Privacy Policy

This Privacy Policy applies to personal information collected by Zyra Financial in the following contexts:

- Consumers whose accounts we own (whether or not you have visited the Site), where we receive your information from the original creditor, previous portfolio owner, or our servicing partners.
- Business contacts — including creditors, lenders, brokers, and other portfolio sellers — who contact us through the Site, by email, or by phone regarding portfolio acquisitions.
- Website visitors who browse the Site or submit inquiries through our online forms.

This Policy does not apply to information collected by our servicing partners directly from consumers. Those servicers operate under their own privacy notices and applicable consumer-protection rules; please refer to the privacy notice provided by the servicing company managing your account for details on their practices.

2. Information We Collect

2.1 Information About Consumer Accounts We Own

In connection with our acquisition and ownership of consumer debt portfolios, we may receive the following categories of information about consumers from original creditors, prior owners, our servicing partners, credit bureaus, skip-trace vendors, and public records:

- Identifiers, such as full name, postal address, email address, telephone number, date of birth, and Social Security number or other government identifiers;
- Account information, such as account number, original creditor, current balance, charge-off date, last

payment date, payment history, and dispute history;

- Financial information, such as bank account or payment-card information used to make payments (typically processed by our servicing partners), and information about prior settlements or payment plans;
- Communications information, including records of correspondence and call recordings produced by our servicing partners in the course of account servicing;
- Information from consumer reporting agencies, such as credit reports and skip-trace data used to locate or verify account holders, where permitted by the Fair Credit Reporting Act (FCRA);
- Publicly available information, such as information from court records, bankruptcy filings, and other public sources used for account verification and management.

2.2 Information Collected Through the Site

When you visit or interact with the Site, including by submitting our Portfolio Sales Inquiry form, we may collect:

- Contact and business information you submit, such as first and last name, company or organization name, title/role, business email address, mobile telephone number, type of debt, approximate portfolio size, and any details you provide about your portfolio or inquiry;
- Consent records, including the date, time, and IP address associated with your submission and your election to receive communications by text message, phone, and/or email;
- Email and message content when you contact us at contact@zyrafinancial.com or by mail or telephone.

2.3 Information Collected Automatically

When you access the Site, we and our service providers may automatically collect certain technical information, including:

- Device and connection information, such as IP address, browser type and version, operating system, device identifiers, and language preferences;
- Usage information, such as pages viewed, links clicked, referring URLs, time spent on pages, and the date and time of your visit;
- Cookies and similar technologies, as described in Section 8 (Cookies and Online Tracking) below.

3. How We Use Your Information

We use the information described above for the following business purposes:

- To own, manage, evaluate, and account for consumer receivables portfolios we have acquired;
- To engage and oversee servicing partners who communicate with consumers and seek to resolve accounts on our behalf;
- To verify and respond to consumer requests, including debt validation requests, account inquiries, disputes, and complaints;
- To respond to portfolio sales inquiries and other business communications you initiate with us;
- To send communications (including by email, telephone, and — where you have consented — text

message) related to your inquiry or your account;

- To maintain the security and proper operation of the Site, detect and prevent fraud, and protect our rights, property, and the safety of others;
 - To comply with applicable laws, regulations, court orders, subpoenas, and other legal process, including the FDCPA, FCRA, GLBA, TCPA, and state consumer-protection and privacy laws;
 - To conduct due diligence, internal audits, recordkeeping, and other administrative activities; and
 - For other purposes disclosed to you at the time of collection or for which you have provided your consent.
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4. How We Share Your Information

We do not sell your personal information, and we do not share it with third parties for their own marketing purposes. We share information only as described in this Section.

4.1 Servicing Partners

We share consumer account information with the licensed servicing companies we engage to communicate with consumers and manage accounts on our behalf. These servicers are contractually required to maintain appropriate safeguards and to use the information only for purposes consistent with this Policy and applicable law.

4.2 Service Providers and Vendors

We share information with vendors who perform services on our behalf, such as portfolio analytics and valuation, due-diligence support, payment processing, hosting and IT services, secure file transfer, document storage, email and communications platforms, professional services (legal, accounting, audit), and consumer reporting agencies. These providers are limited by contract to using personal information only as necessary to perform their services for us.

4.3 Successors and Affiliates

We may share information with affiliates under common ownership and, in the event of a sale, merger, financing, reorganization, or transfer of all or part of our business or assets (including a sale or assignment of consumer receivables), with the acquiring or successor party. Acquirers of consumer receivables will receive the account information necessary to administer the accounts and will be required to honor disclosures previously made to consumers regarding the data.

4.4 Legal Disclosures

We may disclose information where we believe in good faith that disclosure is necessary to (a) comply with applicable law or legal process, including subpoenas, court orders, and government inquiries; (b) enforce our terms or agreements; (c) detect, prevent, or investigate fraud, security, or technical issues; or (d) protect the rights, property, or safety of Zyra Financial, our consumers, employees, or others.

4.5 With Your Consent

We may share information with other third parties when you have directed or consented to the sharing.

5. We Do Not Sell or Rent Your Personal Information

Zyra Financial does not sell, rent, or otherwise distribute your personal information to third parties for their independent marketing purposes. We do not share your personal information for cross-context behavioral advertising. We share information only with the servicing partners and service providers described above, as required by law, or as otherwise described in this Policy.

6. Financial Privacy Notice (Gramm-Leach-Bliley Act)

Because we acquire and own consumer receivables, we are considered a financial institution under the federal Gramm-Leach-Bliley Act ("GLBA"). This Section serves as our consumer financial privacy notice.

What We Collect

We collect nonpublic personal information ("NPI") about consumers from the following sources: (i) information received from original creditors and prior owners at the time of portfolio acquisition; (ii) information about transactions and account history with us and our servicing partners; and (iii) information from consumer reporting agencies, skip-trace providers, and public records.

What We Disclose

We disclose NPI to nonaffiliated third parties only as permitted by law — for example, to our servicing partners, to service providers performing functions on our behalf, to credit reporting agencies, in connection with the sale or transfer of consumer accounts, in response to legal process, or with your consent.

Your Opt-Out Rights

Federal law gives consumers the right to limit some but not all sharing of NPI. Because Zyra Financial shares NPI only as permitted by law (and not for marketing purposes or with nonaffiliated third parties for their own use), there is generally no information sharing from which you may opt out. We do not share NPI with affiliates for joint marketing purposes, and we do not share information about your creditworthiness with affiliates.

How We Protect Your Information

We maintain physical, electronic, and procedural safeguards designed to protect NPI consistent with the GLBA Safeguards Rule and applicable state law. We restrict access to NPI to employees and service providers who need it to perform their job functions, and we require those parties to maintain the confidentiality of the information.

7. Your California Privacy Rights (CCPA/CPRA)

If you are a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CCPA/CPRA"), provides you with specific rights regarding your personal information. This Section applies to California residents only and supplements the rest of this Policy.

Important note about scope: The CCPA/CPRA does not apply to personal information that is subject to the GLBA or the federal Fair Credit Reporting Act. As a result, most information we hold about

consumers whose accounts we own falls outside the scope of the CCPA/CPRA. The disclosures below apply to information we collect from California residents that is not otherwise exempt — primarily information collected through our Site, from business contacts, and from website visitors.

7.1 Categories of Personal Information Collected and Disclosed

In the preceding twelve (12) months, we have collected the following categories of personal information from California residents in connection with the Site and our business operations:

- Identifiers (e.g., name, postal address, email, phone number, IP address);
- Customer/business records (e.g., company name, title, business contact information);
- Commercial information (e.g., information about portfolios offered for sale, transaction history);
- Internet or other electronic network activity information (e.g., browsing and Site usage data);
- Inferences drawn from the above for business analysis and account management.

We have disclosed each of these categories for the business purposes described in Section 3 and Section 4.

7.2 Sources and Purposes

We collect personal information directly from you (when you submit a form, email us, or interact with the Site), automatically through cookies and similar technologies, and from third parties such as service providers, public records, and (for accounts we own) original creditors, prior owners, and consumer reporting agencies.

7.3 No Sale or Sharing of Personal Information

Zyra Financial does not sell personal information and does not share personal information for cross-context behavioral advertising, as those terms are defined under the CCPA/CPRA. We have not sold or shared personal information for these purposes in the preceding twelve (12) months and do not intend to do so. We do not knowingly sell or share the personal information of consumers under 16 years of age.

7.4 Sensitive Personal Information

To the extent we collect categories of "sensitive personal information" under the CCPA/CPRA (such as Social Security numbers, account log-in credentials, or financial account information), we use that information only for purposes permitted by Section 7027 of the CCPA/CPRA regulations, including providing the services you requested, preventing fraud and security incidents, ensuring quality and safety, and complying with legal obligations. We do not use sensitive personal information to infer characteristics about you.

7.5 Your California Rights

Subject to certain exceptions, California residents have the following rights:

- Right to Know — the categories and specific pieces of personal information we have collected, the sources, purposes, and categories of third parties with whom we have shared it.
- Right to Delete — personal information we have collected from you, subject to legal exceptions.
- Right to Correct — inaccurate personal information we maintain about you.

- Right to Opt Out of Sale or Sharing — as noted above, we do not sell or share personal information, so there is nothing to opt out of.
- Right to Limit Use of Sensitive Personal Information — because we use sensitive personal information only for permitted purposes, there is no need to exercise this right.
- Right to Non-Discrimination — we will not discriminate against you for exercising any of your privacy rights.

7.6 How to Exercise Your Rights

To exercise a right, please contact us by email at contact@zyrafinancial.com, by phone at 855-720-2175, or by mail at the address in Section 15. We will verify your request by asking you to provide information sufficient to confirm your identity. You may use an authorized agent to submit a request on your behalf.

8. Cookies and Online Tracking

The Site uses cookies, web beacons, and similar technologies to operate the Site, remember your preferences, measure traffic and usage, and improve performance. Cookies are small data files stored on your device. Most browsers allow you to control or block cookies through browser settings; if you disable cookies, parts of the Site may not function properly.

We respond to Global Privacy Control ("GPC") signals as required by applicable law. Because we do not sell or share personal information, GPC signals do not change our practices, but receipt of a GPC signal is recorded.

9. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, to administer consumer accounts we own (including for the life of the account and applicable statute-of-limitations and recordkeeping periods after resolution), to comply with our legal, accounting, audit, and reporting obligations, and to enforce our agreements and protect our legal rights. When personal information is no longer required, we securely delete or de-identify it.

10. Information Security

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, use, disclosure, alteration, and destruction. These safeguards include access controls, encryption of data in transit and (where appropriate) at rest, vendor risk management, employee training, and incident response procedures. No security program is perfect, however, and we cannot guarantee the absolute security of information transmitted over the Internet or stored in our systems. If you believe your information has been compromised, please contact us immediately at the address in Section 15.

11. Text Messaging (SMS) and Telephone Communications

If you provide your mobile telephone number and check the consent box on our website inquiry form (or provide verbal consent that is confirmed and logged by our representative), you agree that Zyra Financial may contact you at that number by text message, phone call, and email about your inquiry. Consent is not a condition of any purchase.

Opt-out: Reply STOP to any text message to unsubscribe.

Help: Reply HELP to any text message for assistance.

Rates: Message and data rates may apply. Message frequency may vary.

No sale of mobile data: Mobile information collected through our website form will not be shared with third parties or affiliates for marketing or promotional purposes. Information sharing is limited to our service providers solely to facilitate your inquiry, subject to the rest of this Policy.

Calls and text messages may be recorded or logged for compliance, training, and quality-assurance purposes.

12. Third-Party Websites and Links

The Site may contain links to third-party websites and resources (for example, AnnualCreditReport.com, financialliteracy.rocks, ACA International, and knowmydebt.com). We are not responsible for the privacy practices or content of those websites. We encourage you to review the privacy notices of any third-party site you visit.

13. Children's Privacy

The Site is not directed to children under 16, and we do not knowingly collect personal information from children. If you believe a child has provided us with personal information, please contact us and we will delete the information.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. When we make changes, we will revise the "Last Updated" date at the top of this Policy and, where appropriate, provide additional notice. We encourage you to review this Policy periodically.

15. How to Contact Us

If you have questions about this Privacy Policy, your information, or our privacy practices, please contact us:

Zyra Financial LLC
Attn: Privacy Officer
30 N Gould St, Ste N

Sheridan, WY 82801

Email: contact@zyrafinancial.com

Phone: 855-720-2175 (Toll Free), Monday – Friday, 9:00 a.m. – 5:00 p.m. Mountain Time

For questions about a specific account, please contact the servicing company managing your account. They can verify the debt, discuss payment options, and address account-specific privacy questions.

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