

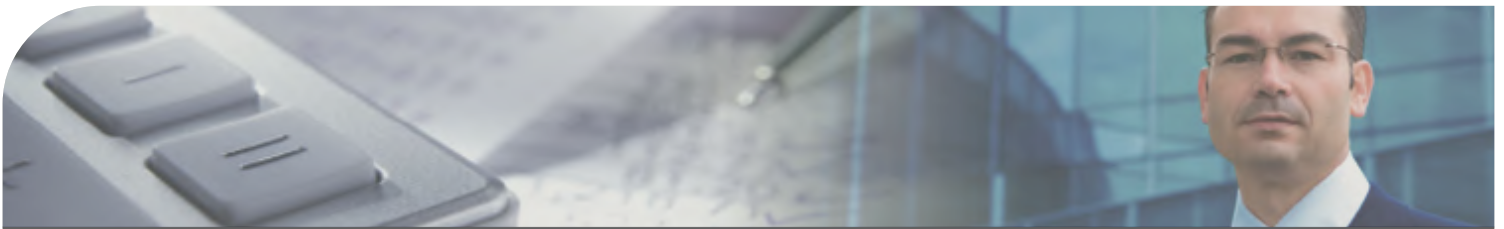


# Critical Functions

The first choice in consumer and commercial debt collection

Compliance

Security



## Regulatory Compliance

The stringent regulatory environment concerning privacy and data security bring compliance to the forefront of every transaction. Cypress Asset Recovery takes compliance seriously and has a zero tolerance policy towards any regulatory violations. Cypress Asset Recovery conducts regular training sessions for its collection staff and supervisors to cover state and federal laws, collection techniques and procedures, customer service and other professionally related topics. All collectors undergo FDCPA, HIPAA, GBLA and FCRA training on a regular basis and maintain certifications of successful completion. Our in-house Compliance Officer continuously updates the company's training programs and manuals to keep them current with latest industry regulations. Lastly, Cypress Asset Recovery's philosophy focuses on improving processes, technology, and collectors' skills to drive performance rather than using aggressive collection

tactics which invite claims of non-compliance with collection statutes.

## Data Security

Cypress Asset Recovery adheres to all federal and state regulations concerning the acquisition and safeguarding of information, the collection of debts, office security and all laws and regulations that apply to our profession. We strive to exceed all government regulations as well as accommodating individualized client data security requirements.

We have built our security protection systems based on three pillars - administrative procedures, physical barriers, and technology solutions. System security limits employees' access to those applications and functions needed to perform their authorized duties. Access to offices and the information maintained by the company is tightly controlled. Our IT system security includes multi-layered firewalls with user identification password protection. We maintain a Disaster Recovery Plan/ Business Resumption plan that is reviewed and updated annually. Our on-site physical security includes video surveillance and private security patrols.