

CFMS Privacy Policy

Effective Date: 2026

This Privacy Policy describes how Cambrian Financial Management Services ("CFMS," "we," "us," or "our") collects, uses, discloses, and protects information in connection with our website, applications, and fiscal management services (collectively, the "Service"), provided in support of California's Self-Determination Program (SDP). By accessing or using the Service, you agree to the practices described in this Privacy Policy.

This Privacy Policy applies to participants, their authorized representatives and Independent Facilitators, Personal Attendants/caregivers, vendors, and other individuals who interact with the Service ("Users," "you").

CFMS does not sell Personal Information of any kind.

A note on health information. Some information CFMS handles relates to participants of a state disability services program. To the extent CFMS holds protected health information subject to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), that information is governed by a separate HIPAA Notice of Privacy Practices, available upon request by contacting us using the information below.

1. Information We Collect

We collect the following categories of information, depending on your role as a participant, representative, Personal Attendant, or vendor:

Identifiers. Name, mailing address, email address, phone number, date of birth, and, where required for tax or background-check purposes, Social Security number or Federal Employer Identification Number.

Precise Geolocation Data. When a Personal Attendant clocks in or out of a shift, we collect the precise geolocation of the device used, as required by federal Electronic Visit Verification (EVV) law (the 21st Century Cures Act) and applicable state regulations. This data is used solely to verify that services were delivered at the authorized location and time, and is not used for advertising, marketing, or any purpose unrelated to service verification and payment processing.

Financial and Payment Information. Information necessary to process payments to vendors and Personal Attendants, including invoice and billing detail, pay rates, hours worked, and mileage submitted for reimbursement. CFMS does not collect or store bank account, routing, or direct deposit/ACH information, or payment card numbers — that information is collected and held directly by our payment processors (Paychex and Bill.com), described in Section 3 below.

Employment- and Service-Related Information. Work history, service codes, professional licenses or certifications, background check results (for Personal Attendants and vendors), and related onboarding documentation.

Program and Budget Information. Information related to a participant's approved spending plan, authorized budget, and the services and vendors associated with that budget, as required to administer the Self-Determination Program.

Usage and Device Information. IP address, browser type, device identifiers, and information about how you interact with the Service, collected automatically to maintain security and improve functionality.

2. How We Use Information

We use the information described above to:

- Process payments owed to vendors and Personal Attendants;
- Verify that services were delivered as authorized, including through EVV geolocation data;
- Administer participant budgets and spending plans in compliance with Self-Determination Program requirements;
- Facilitate required tax reporting and background checks for Personal Attendants and vendors;
- Comply with applicable federal and California state law, including reporting obligations to Regional Centers and the California Department of Developmental Services (DDS);
- Maintain the security, integrity, and proper functioning of the Service;
- Respond to inquiries and provide customer support;
- Fulfill any other purpose for which the information was collected.

We do not use participant, vendor, or Personal Attendant information for advertising or marketing purposes unrelated to the Service.

3. How We Share Information

CFMS does not sell, rent, or trade your Personal Information. We share information only as necessary to operate the Service and meet our legal obligations, including with:

- Paychex, for payroll processing for Personal Attendants — Paychex collects and holds any direct deposit/bank account information directly from Personal Attendants;
- Bill.com, for vendor bill payment and ACH processing — Bill.com collects and holds any bank account/ACH information directly from vendors;
- SignNow, for secure electronic signature and document management;
- Regional Centers and the California Department of Developmental Services, as required for program administration, audit, and compliance;
- Service providers who perform functions on our behalf (such as hosting, identity verification, or background-check services), under agreements requiring them to protect your information and use it only to perform the services requested;
- Government or law enforcement agencies, where required to comply with a subpoena, court order, or other legal process, or to protect the rights, property, or safety of CFMS, our Users, or others.

Each third party listed above is contractually limited to using your information only as necessary to provide their specific service to CFMS.

4. Minors

The Self-Determination Program serves individuals of all ages, and some participants are minors whose accounts are managed by a parent or legal guardian. This Service is not directed at soliciting information directly from children, and any information relating to a minor participant is provided and managed by their parent, legal guardian, or authorized representative.

5. Data Security

We maintain administrative, technical, and physical safeguards designed to protect your information, including encryption of sensitive information in transit and access limited to personnel who need it to perform their job functions. We are committed to continuously strengthening these safeguards to keep your information secure.

6. Data Retention

We retain Personal Information for as long as necessary to fulfill the purposes described in this Privacy Policy, and as required by applicable law — including, where HIPAA applies, a minimum six (6)-year retention period, and any applicable California DDS or Regional Center audit-retention requirements.

7. Notice for California Residents

This section applies to California residents ("Consumers") under the California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA"). It does not apply to protected health information governed by HIPAA or the California Confidentiality of Medical Information Act, which is addressed separately.

Categories of Personal Information We Collect

Category	Examples	Business Purpose
Identifiers	Name, address, email, phone, SSN/FEIN	Service delivery, payment processing, tax and compliance obligations
Sensitive Personal Information	Precise geolocation (EVV), Social Security number	Verify service delivery; process payments; tax and background-check compliance
Financial Information	Pay rate, invoices, hours worked	Process payments to vendors and Personal Attendants
Professional/Employment Information	Work history, licenses, certifications, background checks	Onboarding and program eligibility verification
Internet/Network Activity	IP address, browser type, usage data	Maintain and secure the Service

Your Rights

California residents have the right to:

- Know what Personal Information we collect, use, and disclose;
- Delete Personal Information we hold about you, subject to legal exceptions;
- Correct inaccurate Personal Information;
- Limit the use of Sensitive Personal Information (including precise geolocation) to what is necessary to provide the services you request — which is already how we use it;
- Opt out of the sale or sharing of Personal Information — CFMS does not sell or share Personal Information as defined by the CPRA;
- Non-discrimination for exercising any of these rights.

How to Exercise Your Rights

Submit a verifiable request by contacting us using the information in Section 9 below. We will confirm receipt within 10 business days and respond within 45 calendar days (extendable by an additional 45 days when necessary, with notice to you). You may designate an authorized agent to submit a request on your behalf, subject to verification requirements.

8. Changes to This Policy

We may update this Privacy Policy from time to time. The updated version will be posted with a new effective date. Significant changes will be communicated through the Service or by email where appropriate.

9. Contact Us

Questions or requests regarding this Privacy Policy, or to exercise any of the rights described above, can be directed to:

Email: IT@cfms1.com

Toll-Free: 888-509-9929

Local: 562-969-7777