



## Privacy & Security Policy

Effective Date: July 26, 2011

Protecting your privacy is extremely important to the ApprovalGUARD™ Service. We strive to keep your personal information confidential. Please take a moment to read ApprovalGUARD's Privacy & Security Policy below to ensure that you are aware of and understand how we handle your personal information.

### Why we collect personal information

We may collect personal information to help meet your needs as you browse our website and enroll in our service. The information we require is the absolute minimum necessary. ApprovalGUARD uses your personal information to provide you with superior client services, and to communicate with you regarding your services from ApprovalGUARD. In addition, we use your personal information to keep you up-to-date on the latest service announcements, feature updates, special offers, and other information we think you would find beneficial.

### How we collect personal information

To provide services and help meet your needs, we collect information about you from various sources, including the following:

- We get information from your requests for our products or services or when you register for an account such as name, mailing address, email address, and SSN.
- We get information about your transactions with us.

You may update or change your personal information by contacting us through any of the following methods:

- **ONLINE:** Sign-in to your ApprovalGUARD online Credit Locker™ and go to the MY ACCOUNT tab then click on ACCOUNT INFO. You may change any of your subscription information from this location. Be aware that the information you are changing is what we use to order your ApprovalGUARD credit reports.
- **EMAIL:** Email us at [service@ApprovalGUARD.com](mailto:service@ApprovalGUARD.com)
- **ONLINE REQUEST:** Sign-in to your ApprovalGUARD online Credit Locker™ and go to the CONTACT US tab. Complete the form and provide the changes you would like made. Choose the option to send the request to Customer Support.
- **PHONE:** Call ApprovalGUARD Customer Service toll free at (877) 558-5595
- **MAIL:** Send a letter to ApprovalGUARD Service, Attention Customer Service, 9445 Fairway View Place – Suite 210, Rancho Cucamonga CA 91730

## **Data Retention**

We will retain your information for as long as your account is active or as needed to provide you services or to meet Federal, state or local regulatory requirements. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [service@approvalguard.com](mailto:service@approvalguard.com) We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **When we disclose personal information**

Because the need to effectively communicate with our clients (you) during any part of the ApprovalGUARD service process is absolutely essential, your personal information may be shared with ApprovalGUARD employees who provide that service. They will protect your personal information in accordance with the ApprovalGUARD Customer Privacy Policy described below.

Your personal information may also be shared with secure third party contractors affiliated with ApprovalGUARD to help provide ApprovalGUARD's services to you. We require that these individuals and companies affiliated with ApprovalGUARD safeguard your personal information in accordance with ApprovalGUARD's Customer Privacy Policies. Those policies include (i) ApprovalGUARD's physical, electronic and procedural controls that comply with or exceed industry & government standards, (ii) requirements that ApprovalGUARD's affiliates only use your personal information when they need to provide services to you or work on ApprovalGUARD matters, and (iii) requirements that companies performing work for ApprovalGUARD execute confidentiality agreements to further protect your personal information.

ApprovalGUARD may also share your personal information with third parties (i) to protect against fraud, (ii) to respond to a subpoena, (iii) to respond to requests by law enforcement, or (iv) to comply with a court order, agency order, ongoing judicial proceeding, or other legal process. ApprovalGUARD does not share, sell, rent, or trade your information with third parties for their promotional purposes.

ApprovalGUARD reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our Web site.

## How we protect your personal information



ApprovalGUARD meets or exceeds industry & government standard measures to protect all proprietary systems, reports, and private information. Below is a quick summary of a few of the security and protection features utilized in our systems:

### Network Systems

- Onsite surveillance
- Locked data security locations
- 24/7 Commercial Security Monitoring
- Onsite security services

### Intrusion Projection

- Cryptographic Hash encryption for employee authentication access.
- PCI DSS Information Security & Compliance
- Hardware and Software commercial level intrusion protection services.
- WatchGuard Commercial Firewall Protection
- 256-bit SSL data encryption

All ApprovalGUARD Websites utilize SSL encryption to transmit sensitive information. ApprovalGUARD safeguards the security of the data you send to us with physical, electronic, and managerial procedures. ApprovalGUARD uses Comodo™ Security with 256-bit encryption to protect and secure your personal information and the ApprovalGUARD website. ApprovalGUARD's server hardware and electronic information is backed up in a securely locked environment. ApprovalGUARD's systems are protected by full-time professional security services that include onsite surveillance of ApprovalGUARD's equipment. However, we urge you to take every precaution to protect your personal data when you are on the Internet. Change your passwords often, use a combination of letters and numbers, and make sure you use a secure browser. We also recommend that should you print any of your personal data from our website such as credit report that you store it in the same safe manner you store other sensitive documents or dispose of it using a quality document shredder.

## Collecting other personal information

When you browse ApprovalGUARD's website, we don't collect personal information about you — not even your email address. Your browser, however, does automatically tell us the type of computer and operating system you are using.

Like many websites, the ApprovalGUARD website uses "cookie" technology. When you first connect to our site, the cookie identifies your browser with a unique, random number. The cookies we use do not reveal any personal information about you, except perhaps your first name so we can welcome you on your next visit. Cookies help us understand which parts of our websites are the most popular, where our visitors are going, and how long they spend there. We use cookies to study traffic patterns on our website so we can make the site even better.

In some of our email to you, we use a "click-through URL." When you click one of these URLs, you pass through our web server before arriving at the website that is your destination. We track "click-throughs" to help us determine your interest in particular topics and measure the effectiveness of our customer communications.

### **Our companywide commitment to privacy**

To make sure your personal information remains confidential, we communicate these privacy guidelines to every ApprovalGUARD employee, staff member and secure contractor.

- ApprovalGUARD does not knowingly solicit personal information from children or send them requests for personal information.
- ApprovalGUARD's website may contain links to other sites. ApprovalGUARD does not share your personal information with those websites and is not responsible for their privacy practices. We encourage you to learn about the privacy policies of those companies.

If we are going to use your personal information differently from that stated at the time of collection, we will try to contact you via email using the most recent information we have. If you have not given us permission to communicate with you, you will not be contacted, nor will we use your personal information in a manner not described above.

ApprovalGUARD's Privacy Policy is subject to change at any time. We encourage you to review the Privacy Policy regularly for any changes.

We post customer testimonials on our web site which may or may not contain personally identifiable information such as the customer's name. We do obtain the customer's consent prior to posting any information.

### **How to OPT OUT**

ApprovalGUARD does not use your information for any purpose other than what you intended. At the time that you subscribe to any of our services you electronically agree to receive communications from ApprovalGUARD. If you decide later that you prefer NOT receive emails from ApprovalGUARD you may at any time sign-in online to your ApprovalGUARD Credit Locker. Go to the MY ACCOUNT tab and then the MY INFO page. Click the button to suppress your email communications.

If you suppress your email communications you will not be notified when credit reports or credit articles have been published. It will be your responsibility to check for these services online in your Credit Locker. You may reactive your ApprovalGUARD email at any time by simply un-clicking the email communications suppression button in Credit Locker.

If you are NOT subscribed to a service of ApprovalGUARD and receive any email communication or offers and you prefer not to receive them in the future you can permanently "OPT OUT" by any of the following methods.

- Simply click the [OPT OUT](#) link located at the bottom of any email offer.
- Email us at [service@approvalguard.com](mailto:service@approvalguard.com)

### **Service providers**

ApprovalGUARD utilizes services from the following 3<sup>rd</sup> party sources to provide service to you on this website. These services are NOT able to view your personal information and your information is NOT shared with them. They may merely provide services for internet support or security protection. Companies may include but are not limited to

the following: Google Inc, GoDaddy.com, WatchGuard Security, Comodo Corp, Authorize.net credit card processing, Symantec Security Corp, Verizon Business Services, Truste and the Better Business Bureau.

### **Changes to this Privacy Policy**

If we decide to change our privacy policy, we will post those changes to this privacy statement, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

### **If you need help**

If you need assistance concerning any product or service from ApprovalGUARD You may contact us through any of the following methods:

- EMAIL: Email us at [service@ApprovalGUARD.com](mailto:service@ApprovalGUARD.com)
- ONLINE REQUEST: Sign-in to your ApprovalGUARD online Credit Locker™ and go to the CONTACT US tab. Complete the form and provide the changes you would like made. Choose the option to send the request to Customer Support.
- PHONE: Call ApprovalGUARD Customer Service toll free at (877) 558-5595
- MAIL: Send a letter to ApprovalGUARD Service, Attention Customer Service, 9445 Fairway View Place – Suite 210, Rancho Cucamonga CA 91730

### **Third Party Privacy Protection**

The iQual Corporation has been awarded TRUSTe's Privacy Seal signifying that this privacy policy and practices have been reviewed by TRUSTe for compliance with [TRUSTe's program requirements](#) including transparency, accountability and choice regarding the collection and use of your personal information. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy policy or practices, please contact us at [service@ApprovalGUARD.com](mailto:service@ApprovalGUARD.com) OR toll free at (877) 558-5595. If you are not satisfied with our response you can contact [TRUSTe here](#). The TRUSTe program covers only information that is collected through this Web site.

