

## Privacy Policy

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

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

To make sure your personal information remains confidential, we communicate our privacy policy to every iQual employee and affiliate.

- iQual does not knowingly solicit personal information from children or send them requests for personal information.
- iQual's website may contain links to other sites. iQual 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.

iQual's Privacy Policy is subject to change at any time. We encourage you to review the Privacy Policy regularly for any changes. You may access our Privacy Policy from [www.iQual.com](http://www.iQual.com) or [www.approvalGUARD.com](http://www.approvalGUARD.com) and your member website.

We may post member testimonials on our web site which may contain personally identifiable information such as the member name. We do obtain the member's consent prior to posting the testimonial to post their name along with their testimonial.

### **Third Party Consumer Privacy Protection**



iQual has received the TRUSTe's Privacy Seal signifying that this privacy policy and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. This privacy statement covers the Web sites at [www.iQual.com](http://www.iQual.com) and [www.approvalguard.com](http://www.approvalguard.com).

If you have questions or concerns regarding this statement, you should first contact ApprovalGUARD Member Services at [support@approvalguard.com](mailto:support@approvalguard.com) OR toll free at 1 (877) 558-5595. If you do not receive an acknowledgement of your inquiry or your inquiry has not been satisfactorily addressed, you should contact TRUSTe at [http://www.truste.org/consumers/watchdog\\_complaint.php](http://www.truste.org/consumers/watchdog_complaint.php) TRUSTe will then serve as a liaison with you to resolve your concerns.

### **How we protect your personal information**

iQual meets or exceeds industry 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

- 24/7 Security cameras in data centers
- 24/7 Commercial Security Monitoring

#### 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 iQual websites utilize SSL encryption to transmit sensitive information. iQual safeguards the security of the data you send to us with physical, electronic, and managerial procedures. iQual uses VeriSign™ Security with 256-bit encryption to protect and secure your personal information and the iQual website. iQual's server hardware and electronic information is backed up in a securely locked environment. iQual's systems are protected by full-time professional security services that include onsite video surveillance of iQual'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.

### **Why we collect personal information**

We may collect personal information about you to help meet your needs as you browse our website and enroll in our service. The information we require is the minimum necessary to service your account. iQual uses your personal information to provide you with superior member services, and to communicate with you regarding your services from iQual. 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.

### **What personal information about visitors does iQual collect**

In addition to any personal information or other information that you submit to us, we and our third-party service providers, such as the credit bureaus, may use a variety of technologies that automatically (or passively) collect certain information whenever you visit or interact with our service. For example, through the use of Google Analytics, iQual automatically receives and records information that your browser sends about your visit. This information may include your IP address or other unique identifiers, browser type, browser language, the date and time of your request, and one or more "cookies" (see below) that may uniquely identify your browser from your computer or other device used to access ApprovalGUARD websites.

Below are examples of methods that we may use to collect usage Information. In the future, other new technology and methods for collecting usage information may develop.

**Information You Give Us:** We receive and store any information you enter on our Web site or give us in any other way. You can choose not to provide certain information, but then you might not be able to take advantage of many of our service features. We use the information that you provide for purposes such as responding to your requests, placing an order for our services, providing you with credit reports and communicating with you.

**Cookies.** A “cookie” is a data file placed on a device when accessing websites. Cookies may be used for many purposes, including, without limitation, remembering you and your preferences and tracking your visits to our web pages. If you choose to disable cookies on your device, some features of the website may not function properly. iQual uses cookies when you sign in, to identify you and keep track of your personal visit to our website. All this information is securely stored, and no personal information is stored on your cookie.

iQual uses your website visit session ID cookies to make it easier for you to navigate our site. Session ID cookies expire upon 60 minutes of inactivity or when you close your browser whichever is shorter.

**Pixel image.** Small graphic images or other web programming code called pixel images (also known as “1x1 GIFs” or “clear GIFs”) may be included in our web and mobile pages and messages. Pixel images may be invisible to you, but any electronic image or other web programming code inserted into a web or mobile page or e-mail can act as a pixel image. Pixel images or similar technologies may be used for a number of purposes, including, without limitation, to count users of the website, to monitor how users navigate the website, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages. Pixel images do not connect to personal information. We use a third-party tracking service that uses cookies to track non-personally identifiable information about visitors to our site in the aggregate – e.g., usage and volume statistics to enhance and improve our website.

**Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with the website, such as the links you click on. The code is temporarily downloaded onto your computer or device from our web server or a third party service provider, is active only while you are connected to the website, and is deactivated or deleted thereafter. We use a third-party tracking service that uses cookies to track non-personally identifiable information about visitors to our site in the aggregate – e.g., usage and volume statistics to enhance and improve our website.

### **Changing your Personal Information**

ApprovalGUARD members may update or change their personal information by any method listed below:

- Log-in to your ApprovalGUARD™ member website. Click on MY ACCOUNT and edit your account profile information.
- Log-in to your ApprovalGUARD™ member website. Click on CONTACT to send a message and request to ApprovalGUARD member services with the information you would like changed.
- Email us at [support@approvalguard.com](mailto:support@approvalguard.com)
- Call ApprovalGUARD member services toll free at 1 (877) 558-5595 during normal business hours.
- Send a letter to iQual Corporation, Attention Member Service, 9455 Fairway View Place – Suite 210, Rancho Cucamonga CA 91730

### **When we disclose personal information**

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

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

iQual 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. iQual does not share, sell, rent, or trade your information with third parties for their promotional purposes.

iQual 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 to OPT OUT**

As a member, you may receive email, text and phone communications such as service updates, credit monitoring alerts or appointment reminders. iQual does not use your personal information for any purpose other than what you intended. If you choose to “opt out” of receiving any communications, you may not receive ApprovalGUARD Services as they were intended or as they are outlined in the ApprovalGUARD Terms of Service agreement. If you do not want to receive communications from iQual you may “opt out” by doing the following:

- **“Opt Out” of Email communications:** Simply click the [OPT OUT](#) link located at the bottom of any email offer.
- **“Opt Out” of text or phone communications:** Call ApprovalGUARD Member Services at 1 (877) 558-5595 or email us at [support@approvalguard.com](mailto:support@approvalguard.com)

### **Service providers**

iQual 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 shared with them. They may merely provide services for internet support or security protection. Companies include: Google™ Inc, GoDaddy.com, WatchGuard™ Security, Authorize.net credit card processing, PayPal™, Truste and TransUnion™ Interactive.

### **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 before the change takes effect.

### **If you need help**

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

- Log-in to your ApprovalGUARD member website. Click on CONTACT to send a message and request to Member Services.
- Email us at [support@approvalguard.com](mailto:support@approvalguard.com)
- Call ApprovalGUARD Member Services at 1 (877) 558-5595
- Send a letter to iQual Corporation, Attention ApprovalGUARD Member Services, 9455 Fairway View Place – Suite 210, Rancho Cucamonga CA 91730