

**Last Updated on 03/20/2017**

## **Privacy Policy**

This Privacy Policy Statement explains how Capital Premium Financing, Inc. collects (“we”, “us” or “our” or “CPF”), uses, shares and safeguards your information collected when you use our websites, mobile applications, online services or any of our other products or services (“Services”).

We are committed to protecting your privacy, and will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing, and improving the Services. This Privacy Policy is incorporated as part of CPF’s Terms of Use (the “Terms of Use” or the “Terms” or “End-User License Agreement”, “EULA”). **Your use of the Services is to the Terms of Use, and this Privacy Policy and indicates your consent to them.**

### **At CPF we:**

- do not sell your personal information to anyone;
- do not share your information with non-affiliate companies that would use it to contact you about their own products and services, unless permitted pursuant to a joint marketing agreement;
- require persons or organizations that represent or assist us in servicing you to keep your information confidential;
- require our employees to protect your personal information and keep it confidential unless your contract with us permits to do so.

### **INFORMATION COLLECTION**

We may collect different types of information while you use our Services, and ask you to provide us with certain personally identifiable information for the purpose of:

- registration;
- identifying and communicating with you;
- accessing your account and billing information;
- responding to your requests/inquiries;
- enabling you to conduct financial transactions;
- processing and improving our Services.

Personally identifiable information may include, but is not limited to, your email address, name, phone number, postal address, zip code, credit card information, your bank account information, and any other information ("Personal Information").

We may collect Personal Information from other sources, such as credit bureaus, affiliates, or other companies.

### **LOG DATA**

When you access the Services from or about computers, phones, or other devices we may collect certain technical information ("Log Data"). We use this Log Data to monitor and analyze

how you use our Services, to provide, maintain and improve our Services, to help prevent fraud and misuse and for other security purposes. This Log Data may include information, but not limited to:

- computer's Internet Protocol ("IP") address, browser type and version, pages of our Services that you visit, time spent on those pages, data transmission rates and delays, the time and date of your visit, domain names and physical location, and other statistics;
- your mobile device's unique device ID and type, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, time spent on using our apps, your location information and other statistics.

## **SHARED PERSONAL INFORMATION**

We share your Personal information for:

- conducting our everyday business purposes and mission, and providing you with our Services;
- to credit bureaus to report account information as permitted by law and with banking partners as required by credit card association rules.
- to comply with law and subpoenas requests or any reasonable requests of law enforcement or to protect the security or integrity of our Services. Respond to court orders and legal investigations;
- to protect our rights, operations or property, or that of our users, employees, agents or others;
- to investigate, prevent or take action regarding potential or suspected illegal activities, fraud, security or technical issues, threats, or violations of our Terms;
- with your consent when we provide you with choices;
- If CPF is involved in a merger, acquisition, asset sale or internal reorganization. In that case your Personal Information is transferred and/or becomes subject to a different Privacy Policy.

We may employ third party companies and individuals:

- to facilitate our Services;
- to provide and/or process the Services on our and your behalf;
- to perform Service-related services without limitation(e.g. maintenance services, database management, web analytics, communication and payment processors, improvement of the Services or to assist us in analyzing how our Services are used).

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

We may share Personal information and non-identifying information with other entities to improve our Services for industry analysis, demographic profiling and other purposes.

## **COOKIES**

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We use cookies to collect information in order to improve our services for you.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provides information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

If you do not accept cookies, you may not be able to use some features of our Services and we recommend that you leave them turned on.

## **DO NOT TRACK DISCLOSURE**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **SECURITY**

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store in our secured facilities, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no server, computer or communications network or system, or data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect user information, we cannot ensure or warrant the security of any information you transmit to us or through the use of any of the Services and you acknowledge and agree that you provide such information and engage in such transmissions at your own risk.

## **USERNAME AND PASSWORD USE**

While we cannot guarantee that information transmitted through the Internet is secure, for certain types of communications through our web site and mobile applications, we may require the use of available technologies or other precautions provided for your protection and/or require you to use user identification information ("userIDs") and passwords.

You are responsible for all activities executed under your userIDs and are the only one who may use it. You are responsible for protecting your userIDs and passwords from disclosure to third parties and you are not permitted to avoid the use of required encryption technologies. It is a violation of our terms and conditions for you to allow another person to use your userID and its associated password, use the userID and password assigned to another person, or attempt to gain access to resources for which you are not authorized.

Accessing a computer without authorization or exceeding authorized access is a serious breach of security and may constitute a criminal act.

## **INTERNATIONAL TRANSFER**

Your information may be transferred to CPF and maintained on CPF computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction.

If you are located outside the United States and choose to provide information to us, we transfer your Personal Information to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

## **LINKS TO OTHER SITES**

Our Services may contain links to other sites that are not operated by us or may be incorporated into third party websites. If you click on other sites or a third party link (Third Party), you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **CHILDREN'S PRIVACY**

Only persons age 18 or older have permission to access our Services. Our Services do not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you learn that your Children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a children under age 13 without verification of parental consent, we take steps to remove that information from our servers.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of the date shown above and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

## **INFORMATION CHANGES AND UPDATES**

You may review, update, correct or delete the Personal Information in your registration profile by contacting us. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [info@capitalpremium.net](mailto:info@capitalpremium.net).

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.