

# All-State Credit Plan, LLC

# **Privacy Statement**

## **General Overview**

This website (collectively "All-StateCredit.com" or "Site") is an interactive on-line service operated by All-StateCredit.com, and one or more of their affiliated or related websites.

The purpose of this Privacy Statement ("Statement") is to disclose to you what information We may collect, how We may collect it, with whom We may share it, and certain other matters related to such information, including the choices you have regarding our collection of information and our use and disclosure to other parties of information We may have collected from you.

All-StateCredit.com takes privacy seriously. All-StateCredit.com staff is committed to protecting your privacy. We use the information we collect about you to facilitate commercial transactions and to provide you with a more personalized experience with this Site and with All-StateCredit.com staff. We have created this Privacy Statement in order to demonstrate our firm commitment to protecting the privacy of all of our customers and visitors. The following paragraphs and sections of this Statement disclose the information-gathering and dissemination practices and policies of All-StateCredit.com.Except as otherwise discussed in this Statement, this document only addresses the use and disclosure of information We collect from you on-line or otherwise, including when We reference this Statement. For some services, We may collect and transfer personal information to a service provider you have selected, or you may visit other merchants or third parties through links on our Site who may collect and use your personal information in ways and manners different than All-StateCredit.com. We strongly encourage you to ask questions, to be very cautious, and ensure you are dealing with a reputable site or company before you disclose any personal or financial information to others.

Please read the following to learn more about our data collection policies and practices.

By using this Site you consent to and acknowledge the collection and use of your information by All-StateCredit.com as set forth in this Statement.

## **Personal Information Privacy Principles**

We collect, store, process, and use any personal information Site users provide to us or that we otherwise gather on this Site or otherwise in accordance with the following principles:

## Accountability:

- All-StateCredit.com will only collect personal information that is required or legitimate in the course of normal business operations.
- Wherever necessary, All-StateCredit.com will advise third parties that receive or process information on All-StateCredit.com's behalf to provide a comparable level of privacy protection in respect of such information.

Identifying Purposes, Obtaining Consent and Limiting Use:

- When collecting personal information, All-StateCredit.com will disclose the purpose for the information collection and will obtain consent, when required, to allow All-StateCredit.com to use the information in the course of normal business operations.
- Please note that if the collection, use or disclosure of personal information is permitted by law or required by court order or other legal proceeding, All-StateCredit.com will not seek additional consent or provide any additional notice to you.

# Safeguards:

- All-StateCredit.com safeguards personal information by employing security measures that are appropriate and commercially reasonable based on the sensitivity level of the information in question.
- However, as effective as our security measures are, no security system is impenetrable.
  We cannot guarantee the security of our database, nor can we guarantee that
  information you supply will not be intercepted while being transmitted to us, but before
  it gets to us, over the Internet. We ask that you do your part to ensure security of
  personal information, by maintaining any computer passwords you use to access the
  Internet or your computer strictly confidential, to use secure Internet connections, and
  to use virus-protected computer hardware whenever possible.

## **Information We May Collect; Information Use**

All-StateCredit.com may collect personally identifiable information, including name, title, company, address, e-mail address, phone numbers, and the like when you correspond with Us or submit questions or comments to Us through the Site or otherwise. We do not require you to provide personal information to obtain access to any public portions of our Site.

Any personal information we maintain about you will be used for the purpose indicated on the Site or as stated in this Statement or as specifically disclosed to you. All-StateCredit.com collects information to facilitate the services offered on this Site and to provide better and more useful services to the users of the Site, and to respond to queries or requests of users. If you submit personal information to us through this Site, we may use your information to initiate periodic communications (by phone, fax, email, or mail) with you about services or products that are

offered by All-StateCredit.com or any of its affiliates or business partners, about upcoming events that may be of interest to you, and similar types of information.

If you do not want us to communicate with you at all, or by specific modes of communication, or about certain types of information, you can "opt out" or customize your level of communications you received from Us as described below in the section entitled "Access, Amendment, and Deletion" below.

The information collected on this Site is currently stored on servers physically located within Canada and/or the United States; however, All-StateCredit.com reserves the right to store such information in any other location, as deemed necessary or desirable by All-StateCredit.com in its sole discretion and without further notice.

## Access, Amendment, and Deletion

If at any time you would like to correct, change or view personal information you have submitted to All-StateCredit.com on-line or otherwise through this Site, or otherwise, if you would like to remove your name completely from our database, or if you would like to customize what information you receive and how you receive it, please use our contact page for communicating your wish for "opting out" from such communications in the future.

## **Personal Information Sharing Practices**

When you share personal information on this Site or otherwise with All-StateCredit.com you are sharing that information with All-StateCredit.com, including our subsidiaries and related companies. We will not sell, exchange, or otherwise distribute your personally identifiable information, without your consent, except to the extent required by law, in accordance with your instructions, or as otherwise set out in this Statement.

All-StateCredit.com may share your personal information with third party business partners or service providers so that they may provide services to All-StateCredit.com that are consistent with the terms of this Statement. As we continue to develop our business, we might sell or buy assets. In such transactions, user information generally is one of the transferred business assets. Therefore, please be advised that if All-StateCredit.com or any of its affiliated companies or subsidiaries were acquired or if all of the material assets of All-StateCredit.com or any of its affiliated companies or subsidiaries is sold, your personal information may be one of the transferred assets.

All-StateCredit.com may also disclose personal information collected through this Site or otherwise in special circumstances. For example, if it appears that a user is accessing or using the Site or our Servers for illegal or disruptive purposes to All-StateCredit.com or to any other party. We may also use personal information that we maintain about a user to resolve disputes and troubleshoot problems. All-StateCredit.com may also disclose personal information when All-StateCredit.com believes in good faith that such disclosure is required by law or necessary to protect other Site users or the public.

## <u>Limitation of Liability</u>

By providing Us with any personal information, you expressly and unconditionally release and hold harmless All-StateCredit.com its parents, shareholders, owners, members, and each of their subsidiaries, affiliates, directors, officers, employees, and agents (collectively, the "Releasees") from any and all liability for any injuries, loss or damage of any kind arising from or in connection with the use and/or misuse of your collected personal information from the Site. In addition, while All-StateCredit.com takes efforts to ensure that the use of user personal information provided to third party companies, promotional partners or vendors shall be in accordance with this Statement, the Releasees are not liable for any injuries, loss or damage of any kind arising from or in connection with the use and/or misuse of your collected personal information by such third parties.

# **External Links**

This Site may include links to third party Web sites which we do not own or control. Therefore, you should be aware that when you are on the Site, you could be directed to other sites beyond our control. For example, if you "click" on a banner advertisement, the "click" may take you off the Site onto a different Website. This includes links from advertisers, sponsors, and partners that may use the Site's logo as part of a co-branding agreement. These other Websites may send their own cookies to you, independently collect data or solicit personal information, and may or may not have their own published privacy policies. If you visit a Website that is linked to our Site, you should consult that Web site's privacy policy before providing any personal information. If you cannot find the privacy policy of any of these third party Web sites via a link from the Web site's homepage, you should contact the third party Web site operator directly for more information. All-StateCredit.com's Web Site Privacy Statement does not apply to any information you submit to third-party Websites, including, without limitation, any Websites that may be connected to our Site by hypertext link or otherwise.

## **Policy Updates**

This Statement was last updated on March 4, 2011. We reserve the right to modify this Statement from time to time and for any reason. If we modify this Statement, we will post the modified Statement on the Site - so please check back from time to time to ensure that you have reviewed and are familiar with the current terms and conditions set forth in this Statement.

# **Policy addendum regarding Google Analytics Advertising Features**

In order to receive information about your Personal Data, the purposes and the parties the Data is shared with, contact the Owner.

## **Data Controller and Owner:**

All-State Credit Plan, LLC, <a href="mailto:info@all-statecredit.com">info@all-statecredit.com</a>

# How visitors can opt-out of the Google Analytics Advertising Features

Google Analytics Google Analytics Opt-out Browser Add-on for the web.

# **Types of Data Collected**

The owner does not provide a list of Personal Data types collected.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

# Mode and Place of Processing the Data

# **Methods of Processing**

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

## **Place**

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

## **Retention Time**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

# **Additional Information About Data Collection and Processing**

## **Legal Action**

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

#### **Additional Information About User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

#### **System Logs and Maintenance**

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

## Information Not Contained in This Policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

## The Rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support "Do Not Track" requests.

To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies.

## **Changes to This Privacy Policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of

the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller removes the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

# **Information About This Privacy Policy**

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by Jubenda and hosted on Jubenda's servers.

# **Definitions and legal references**

## Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

#### **Usage Data**

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refer.

## Data Subject

The legal or natural person to whom the Personal Data refers.

#### **Data Processor (or Data Supervisor)**

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

## **Data Controller (or Owner)**

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

## This Application

The hardware or software tool by which the Personal Data of the User is collected.

## **Legal Information**

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.

This privacy policy relates solely to this Application.



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