

# Privacy Policies

## Our Commitment to Privacy

We respect the privacy of your information. We provide this explanation about our online information practices as a show of our commitment to protect your privacy.

We do not sell or rent or share or in any other way use personally-identifying information collected during your use of our Website without your permission.

We will notify you at the time of data collection or transfer if your personally-identifying information will be shared with a third party. You will always have the option of not permitting the transfer by not using the particular services or not participating in the promotion or contests for which the information is collected or shared.

## The Information We Collect

At the time you register on our site, we collect and store your name, address, credit card numbers and other personally-identifying information. The customer information we collect is categorized as follows:

- Application Information - information that you provide to us through our Website and through other means. Examples include your physical address, zip code and phone number.
- Transaction and Experience Information - information about your transactions with us, as well as information about our communications with you. Examples include your account history, requests for information and our responses.
- Information from Outside Sources - information from outside sources regarding your credit, background and other relationships. Examples include your employment history and public record information.]

We need this information to provide and to authorize our insurance carrier partners and other service providers to provide the insurance products and services that you request and to let you know of additional goods and services about which you might be interested. We also use this information to customize your experience using our Website.

We may also share the information we collect about you with third parties from one or more of the following categories

- Insurance carriers
- Insurance Adjusters
- Credit Card Companies
- Banks

## -Government Agencies

We may ask you for personally-identifying information at other times, such as if you enter into a promotion, post a classified ad, communicate with us, or complete a survey. If you *opt-in* to receive information regarding a promotion, you give us your permission to share your name and e-mail address with the third party offering the promotion.

In addition, we automatically gather general statistical information about our Website and visitors, such as IP addresses, browsers, pages viewed, number of visitors, goods and services purchased, etc., but in doing so we do not reference you by individual name, e-mail address, home address, or telephone number. We use this data in the aggregate to determine how much our customers use parts of our site so we can improve our site. We may provide this statistical information to third parties, but when we do so we do not provide personally-identifying information without your permission, unless required by law or as part of our investigation of possible use of our System in violation of our Terms & Conditions. We may match user information we collect with offline data available from other sources in order to carry out our services and conduct target advertising and promotions more effectively.

As part of our services, we use cookies and/or sessions to store and sometimes track information about you. Some features of our site may be available only through the use of a cookie. A cookie is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. Generally, we use cookies to remind us who you are and enable us to access your account information so you do not have to re-enter it; gather statistical information about usage by registered or unregistered users, research visiting patterns, and help target advertisements based on user interests; assist our retail partners track visits and process orders; and track progress and participation in promotions. In some instances, our retail partners and advertisers appearing at our site may use their own cookies. Preference and options configurations in your browser determine if and how a cookie will be accepted. You can change those configurations on your computer if you desire. By changing your preferences, you can accept all cookies, you can be notified when a cookie is set, or you can reject all cookies. If you do so and cookies are disabled, you may be required to re-enter your information more often and certain features of our site may be unavailable.

If you obtain goods or services provided by one of our insurance carrier partners or service providers, we may exchange with the vendor personally-identified information about you for purposes of your transaction.

## **The Way We Use Information**

We use your personally-identifying information to improve our marketing and promotional efforts, to statistically analyze site usage, to improve our content and product offerings and to customize our site's content, layout, and services.

We may use your information to deliver information to you that, in some cases, is targeted to your interests, such as targeted banners, new services and promotions. You can *opt out* of receiving this information by e-mailing such request to [InternetBusinessDivision@heffgroup.com](mailto:InternetBusinessDivision@heffgroup.com) with "opt out" in the subject line. We may ask you to provide us voluntarily with additional information regarding your personal or business interests, experience or requests, which we may use to customize our service for you.

We use your e-mail address, your mailing address, and phone number to contact you regarding administrative notices, new product offerings and communications relevant to your use of the site. We will not send you promotions or announcements unless you give us permission to do so.

You can *opt out* of receiving such contact by e-mailing such request to [InternetBusinessDivision@heffgroup.com](mailto:InternetBusinessDivision@heffgroup.com) with "opt out" in the subject line.

If you place a request for insurance products or services, we use information to fulfill your order; if the insurance products or services are from a business partner of ours, we may provide your relevant information to that business partner for purposes of the transaction. If you establish a credit account with us or our business partners, we collect additional information, including billing information, credit card number and expiration date, and tracking information from checks or money orders.

We may also use or disclose information to resolve disputes, investigate problems, or enforce our Agreement. At times, we may review status or activity of multiple users to do so. We may disclose or access information whenever we believe in good faith that the law so requires or if we otherwise consider it necessary to do so to maintain service and improve our products and services.

We use your IP address to help diagnose problems with our server, to manage our Website and to enhance our site based on the usage pattern data we receive.

## **Security**

We employ reasonable and current security methods to prevent unauthorized access, maintain data accuracy, and ensure correct use of information, as more fully described in the Agreement of which these Privacy Policies are a part.

Note: This paragraph only applies to situations where an individual online account is created for you. If such an online account is ever created, your

account information and profile will be password-protected. We recommend that you do not divulge your password to anyone. Our personnel will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail. Remember to sign out of your account and close your browser window when you have finished your session. This is to help ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place where others may have access to it.

Whenever you voluntarily disclose personal information online – for example on message boards, through e-mail or in chat areas-this information can be collected and used by others.

No data transmission over the Internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we try to protect your personal information, we cannot ensure or guarantee the security of any information you transmit to us, and you do so at your own risk.

### **How You Can Update, Correct or Delete Your Information**

Once you have secured at least one current insurance policy through our Web Site, you can update, correct, or delete information by contacting an account representative by phone or email.

Phone – 213-236-0511. E-mail: [InternetBusinessDivision@heffgroup.com](mailto:InternetBusinessDivision@heffgroup.com)

During the normal course of doing business, we will continue to share your information among our business units, our affiliates and unaffiliated third parties as necessary in order to service your accounts, respond to any queries or provide any insurance policies.

### **Children Under 13**

We have no way of distinguishing the age of individuals who access our Website, and so we carry out the same Privacy Policy for individuals of all ages. If a child has provided us with personally-identifying information without parental or guardian consent, the parent or guardian should contact us to remove the information and opt out of promotional opportunities.

### **Third Party Practices**

The Privacy Policy of an advertiser or promotional service appearing at our site may differ from ours. We encourage you to read that policy before responding to the offer.

### **Changes to Our Policy**

This Privacy Policy became effective on July 1<sup>st</sup> 2008. Any changes to our Privacy Policy will be communicated through our Website at least 2 days in advance of its effective date.  
Information collected before changes are made will be secured according to the previous Privacy Policy.

### **Your Consent**

By using our Website, you consent to the collection and use of this information in the manner we describe.