# **Vantage Business Support & Insurance Services**

# **Privacy Policy**

Vantage is committed to protecting your privacy. This Statement of Privacy applies to the Vantage website, blogs, and governs data collection and usage. By using the Vantage website, you consent to the data practices described in this statement.

Vantage Business Support Services, Inc. ("Vantage") operates this website (the "Site"), other insurance, business support, and community service websites that are part of the Vantage portfolio of websites (collectively, the "Sites") and the services or products related to or offered on the Sites (hereinafter, the "Services"). Some of the Sites are websites that we operate on behalf of third party licensors. Vantage's Services may include, without limitation, information, products, tools, applications, email services, bulletin and message boards, chat areas, news groups, forums, communities, calendars, and downloadable mobile applications related to the Sites or provided through the Sites.

We provide you this privacy policy (the "Policy") to help you understand the kinds of information we may gather about you when you visit the Site or use any of our Services, how we may use and disclose the information, and how you can control, correct and/or update the information.

To be clear about the terminology we are using, when we use the phrase "Personal Information" in this Policy, we mean information that can be used to uniquely identify or contact a single person, like your full name, address, e-mail address, or phone number. When we use the phrase "Anonymous Information" in this Policy, we mean information that does not enable identification of or contact with individual persons.

By visiting this Site or using the Services, you are accepting the policies and practices described in this Policy. Each time you visit the Site or use the Services, you agree and expressly consent to our collection, use and disclosure of the information that you provide as described in this Policy.

Your Personal Information will be processed by us in the United States where laws regarding processing of Personal Information may be less stringent than the laws in other countries.

#### 1. The Information We Gather

We collect information about you in three ways:

# A. Information you voluntarily provide us

We collect and maintain information that you voluntarily submit to us during your use of the Sites and Services. For example:

- when you register for a Site, you may provide us certain information including your name, email address, screen name, password, demographic information, and the insurance, health, business support, or community service topics that interest you;
- to engage a Site's social networking function, you may add to your profile by providing information about your interests or insurance, health, business support, or community service topics.
- if you sign-up to receive a newsletter, enter a contest or participate in social networking activities, we may require that you provide us contact information (e.g., email or physical address);
- if you purchase a product or service, we collect credit card information; and
- you may provide us with Personal Information in the course of email, customer support interactions and surveys.

You can choose not to provide us with certain information, but this may stop you from gaining access to a Service or limit the features that you can use.

# B. Information we collect through your use of the Site.

As you use the Site and Services, certain information may also be passively collected. Through cookies, pixels, beacons, log files and other technologies, we may collect information about how you use the Site and the Services. By knowing about you, we can deliver more helpful information, programs, tools and advertisements.

#### C. Information we receive from third parties.

In addition to the information that you provide or we collect on the Site or through the Services, we may verify or collect certain information about you from third parties. For example, we may use your email address to determine your street address or we may use your street address to obtain demographic information about you or the 9-digit ZIP code (ZIP+4) in which you live. We may combine this third party information with the information we have already collected from you via our Sites and Services. We protect

and use this third party information in the same way that we treat other information - in conformance with this Policy.

#### 2. How We Use Your Information

We will use your Personal Information in the ways described below or described at the time that the information is collected. Vantage collects and uses your personal information to operate the Vantage website and deliver the services you have requested.

# A. Advertising.

We believe that advertising is more interesting to you when it is relevant. Accordingly, we may customize the advertisements that you see based upon: (i) the information that you knowingly provide us (e.g., age, gender, stated interests and other information in your profile); (ii) geographic location which we may determine through your IP address or from your mobile device; (iii) data we receive from third parties or (iv) your behavior on the Sites or Services (commonly referred to as "Behavioral Advertising").

#### B. To Provide the Sites and Services.

In general, we use your Personal Information as necessary or appropriate to:

- · administer your account;
- register you and provide you access to the Site or Services;
- respond to your inquiries or requests that you direct to us;
- send communications and administrative emails about the Sites or Services:
- personalize and better tailor the features, performance and support of the Sites and Services for your use;
- send you promotional/marketing information, newsletters, offers or other information regarding opportunities and functionality that we think would be of particular interest to you (provided that we will not give your
- Personal Information to any third party advertising partner without your consent);
- improve the quality of the Site and the Services, and
- analyze, benchmark and conduct research on, user data and user interactions with the Site and Services.

# 3. Cookies and Targeted Advertising

## A. Cookies, Web Beacons and IP Address Information

 "Cookies" are small pieces of information that a website attaches to your browser when you visit that website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until deleted) to provide you with a more personal and interactive experience with the Sites and Services. For example, we may use cookies to control what advertisements you see, the sequence of advertisements and to make sure you don't see the same advertisement too many times. For contests or sweepstakes, we may also use cookies in order to track your progress and the number of entries in some promotions. For polls, we may use cookies to help ensure that an individual can't vote more than once on a particular question or issue. We do not store Personal Information in any cookies on your computer.

- Cookies can be removed by following your Internet browser's directions within the help tab. In order to use certain Services offered through the Sites, your web browser must accept cookies. If you choose to disable cookies, some aspects of the Sites may not work properly, and you may not be able to access our Services.
- We may also use cookies, pixels, web beacons (which are usually small, transparent graphic images), operating system and device information and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit, the features and information for which you searched and viewed, the email you opened, or on which advertisements you clicked. This type of information is collected to make the Sites and Services more useful to you and to tailor the experience with us to meet your special interests and needs.
- An "Internet protocol address" or "IP Address" is a number that is automatically
  assigned to your computer when you use the Internet. We, or our service providers,
  may track your IP Address when you access the Sites or Services or use other means
  to assist with delivering geographically targeted advertisements.

## **B. Targeted Advertising**

Vantage's third party vendors may use cookies to understand Web usage patterns of users who see advertisements on the Sites, to control the sequence of advertisements you see, to make sure you don't see the same advertisement too many times, to determine your interests and to target advertisements and promotions based on those interests. For example, if you read an article about a particular insurance, health, business support, or community service topic on the Sites, we may use cookies from a third party vendor to determine that you are interested in that topic and we may later serve you an advertisement for a product intended to assist with that particular interest. These third party vendors may connect information about pages you visit on our Sites with information about pages you visit on other websites and show you advertising based on this combined information. The advertisement may appear when you are

visiting a different section of this Site, another Site or any other website on the Internet if the website also has a relationship with our vendor.

You can choose not to receive Behavioral Advertising on the Sites by clicking here and opting-out of cookies placed by third party vendors. After you opt-out, you will still see advertisements provided by our vendors, but the advertising will not be tailored to your web preferences and usage patterns.

## C. Information Collected by Third Party Advertisers

Advertisers on the Sites may also engage in Behavioral Advertising and use cookies and web beacons in the manner described above. We do not control these third parties' use of cookies or web beacons or what they do with the information they collect. Many third party vendors that engage in Behavioral Advertising participate in the Network Advertising Initiative (NAI) and abide by NAI principles, which prohibit members from connecting Personal Information to information they collect through cookies without your explicit consent. If may wish to opt out of participating in advertising programs conducted by NAI members or learn more about the NAI.

#### 4. How We Disclose Information to Third Parties

We know how important it is to keep the information you've entrusted to us confidential. We will not rent, sell or share your Personal Information with third parties except as specifically approved or under the circumstances described below. If you do not want us to use or disclose Personal Information collected about you in the ways identified in this Policy, you should not use the Site or Services.

### A. Disclosure for legal reasons.

We may disclose and release your Personal Information to third parties: (a) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or (b) in special cases, such as a physical threat to you or others, a threat to homeland security, a threat to our system or network, or cases in which we believe it is reasonably necessary to investigate or prevent harm, fraud, abuse, illegal conduct or a violation or alleged violation of this Policy or other agreement we may have with you.

#### **B.** Agents and Contractors.

We may provide your Personal Information to third party service providers who work on our behalf or help us to operate our business, the Sites and the Services. Examples of such service providers include vendors and suppliers that provide us with technology, services, and/or content for sending email, analyzing data, research, providing

marketing assistance, processing payments (including credit card payments), and providing customer service. Access to your Personal Information by these service providers is limited to the information reasonably necessary to perform its limited function. These service providers have an obligation under their contracts with us to keep your Personal Information confidential.

## C. Aggregated, Anonymous Information.

We may share aggregated Anonymous Information about you with third parties. Aggregated information is your Anonymous Information that is combined with the Anonymous Information of other users and does not allow you to be identified or contacted. Depending on the circumstances, we may or may not charge third parties for this aggregated information, or limit the third parties' use of the aggregated information.

## D. Contests, sweepstakes and polls.

Some or all of the information collected during a contest or sweepstakes may be disclosed publicly. It may also be shared with other third parties as disclosed at the time of collection or in the promotion rules. These third parties may include a provider of prizes in order to update you of your status of you prize or other fulfillment needs or a co-sponsor who may use your Personal Information to administer the promotion or for marketing purposes, but only in conformance with their privacy policy as made available to you at the time of collection. If data will be disclosed or shared in this manner, we will include a notice at the time of collection of such information.

## E. Sponsors - and other ways that you approve at the time of collection.

We may collect Personal Information about you and share it with third parties to the extent that you give us permission at the time of collection. For example, we sometimes gather Personal Information on behalf of a sponsor in association with a promotion. In such a case, we will provide you clear notice at the time of collection that the information is being collected on the sponsor's behalf and link to the sponsor's privacy policy. The sponsor is contractually obligated to comply with their privacy policy.

## F. Within our Company; Changes to our Company.

We may share all or some of your Personal Information with any of our subsidiaries, joint ventures, or other companies under common control, in which case we will require

them to honor this Policy. Additionally, in the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Policy, and that any entity that acquires us, is merged with us or that acquires our assets may continue to process your Personal Information as set forth in this Policy.

#### 5. Message Boards and Chats

We may make message boards, chat rooms, and other interactive forums available as part of the Services. You should be aware that any information which you post to these interactive forums or otherwise choose to make publicly available, including your Personal Information, may be disclosed and available to all users who have access to that portion of the Site or Services, and is therefore no longer private. By using these interactive forums, you agree that we are not responsible for any information that you disclose or communicate in such forums, and any disclosures you make are at your own risk.

#### 6. Children's Information

The Site and Services are not directed or intended for children under 13 years of age. We do not knowingly collect Personal Information from individuals under 13 years of age. If you are under 13 years of age, you should not register or provide Personal Information on the Site or through the Services. If we later obtain actual knowledge that a user is under 13 years of age, we will take steps to remove that user's Personal Information from our systems. If you are the parent or guardian of a child whom you believe has disclosed Personal Information to us, please contact us at info@vantagebss.com so that we may delete and remove such child's information from our systems.

#### 7. Updating and Control of Your Personal Information

We offer you choices regarding the collection, use, and sharing of your Personal Information. When you receive promotional communications from us you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the promotional e-mail or newsletter you receive or by editing your preference to receive these communications within the "Manage My Email" or similar feature on the individual Sites when you are logged in as a registered user.

#### 8. Third Party Links

The Sites may link to websites operated by third parties that we do not control. We do not monitor, control, or endorse the information collection or privacy practices of any

third parties. We strongly encourage you to become familiar with the privacy practices of every website you visit and to contact them if you have any questions about their respective privacy policies and practices. This Policy applies solely to information collected by us through the Sites or Services and does not apply to these third party websites. The ability to access information of third parties from the Sites or Services, or links to other websites or locations, is for your convenience only and does not signify our endorsement of such third parties, their products, services, websites, locations or their content

# 9. Security

We place a priority on the security of Personal Information, and we undertake reasonable security measures to protect the data that resides on our servers. We also uses secure server software (SSL) to process all financial transactions that occur on the Site. SSL technology can encrypt Personal Information transmitted over the Internet. However, no security system is impenetrable. We do not warrant the security of our servers, nor do we warrant that your information, including Personal Information, will be completely secure or not be intercepted while being transmitted over the Internet.

#### 10. How To Contact Us

If you have any questions regarding privacy or this Policy, you may contact us by completing the "Contact Us" form from our website

## 11. Privacy Policy Changes

We reserve the right to change, modify, add or remove portions of this Policy at any time and without prior notice, and any changes will become effective immediately upon being posted unless we advise you otherwise. However, we will not use your Personal Information in a way that is materially different than the uses described in this Policy without giving you an opportunity to opt-out of such differing uses. Your continued use of the Site or Services after this Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of the Policy, as amended. We encourage you to bookmark this Web page and review this Policy regularly.