

#### **Our Mission**

Regal Credit Management, ("RCM", "we", "our" or "us") is committed to enriching lives by protecting what matters most. This includes safeguarding your Personal Information (defined below), and treating such information with security and respect. We understand the need to feel safe when sharing information with third parties, and we have developed this Privacy Policy to help you understand our practices and how to exercise choice regarding the collection and use of your personal information.

## **Scope and Other Agreements and Notices**

Our Privacy Policy applies to information about you that is gathered automatically ("General Information") and to Personal Information (as defined below) that we collect directly from you online and offline, as well as information we collect about you from other sources, such as from third party partners and affiliates, which we may append to other information we collect from or about you. This Privacy Policy applies to visitors and users of our website, <u>www.regalcredit.com</u> (our "Site"), users of Services that we provide at no charge ("Users"), users of Services that require payment of a fee ("Members") (we refer to our Users and Members collectively as our "Clients"), and prospective Clients.

In addition to this Privacy Policy, other contract terms such as our Regal Credit Management, Service Terms and Conditions (the "Service Terms") and our <u>Website</u> <u>Terms of Use</u> will apply to you, based on the Services you select or use. If you use other Services, additional privacy terms may also be applicable.

#### IF YOU DO NOT AGREE TO OUR PRACTICES AS DESCRIBED IN THIS POLICY, DO NOT USE OUR SITE AND SERVICES.



#### **Regal Credit Management's Commitment**

We are committed to (1) working with our Clients to obtain a fair resolution of any complaint or concern about privacy concerns and our Services, and (2) supporting law enforcement and regulatory agencies committed to stopping crimes of identity theft and identity fraud. To contact us with a question or concern about our privacy practices, email us at <u>info@regalcredit.com</u> or write to us at Regal Credit Management, 1270 Avenue of The Americas, 7th FL, New York, NY 10020.

#### **Modifications**

We may modify our policy from time to time. We will post those modifications to of our website prior to the modifications becoming effective. We will notify you of material modifications to this Privacy Policy, including sending you a copy of the updated policy by email if we have your email address on file, prior to the change becoming effective. Your continued use of the site or our services after any such modification means that you accept the modified policy. Each time you use the site, the latest version of the policy will be displayed and will apply.

#### **Members and Users**

You need not enroll or register with us to just visit and view our Site. However, if you elect to obtain or use any of our Services you must register or enroll (or be enrolled by an authorized third party) with us, and you must agree to our Service Terms, which incorporate by reference this Privacy Policy.

## **Third Party Websites**

(collectively, "Third-Party Sites"). Certain areas of our Site may allow you to interact with Third-Party Sites and, in certain situations, you may be transferred to a Third-Party Site through a link but it may appear that you are still on our Site. The Third-Party Sites may have different privacy policies and terms and conditions and/or business practices than



we do, and your use of Third-Party Sites is governed by that Third-Party Site's privacy policy and terms and conditions. Some of our pages also utilize framing techniques to serve content to or from our partners while preserving the look and feel of our site. Please be aware that you are providing your personal information to these third parties and not to Regal Credit.

#### **Information We Collect**

We may collect information about you from a variety of sources, including information we gather from you directly when you register or enroll (or are enrolled by an authorized third party), use our Services, or view our Site or our online advertisements. We may also gather information from other sources as described below.

#### **Information We Collect**

Some Personal Information is collected when you register or enroll for the Services, otherwise agree to prove information directly to us, or are enrolled for the Services by an authorized third party. Here are some of the kinds of Personal Information we may collect directly from you or an authorized third party:

- Name
- Contact information (email address, postal address, phone number)
- Social Security Number
- Date of Birth
- Personal details to verify your identity, such as your mother's maiden name
- Payment and Financial Information, such as a credit card or financial account number
- Government identity information, for example, driver's license information, voluntarily identified by you in your Member portal
- Product Preferences and interests
- Communication Preferences



- Other information that you may voluntarily provide in response to member surveys or studies or as part of enrollment in a new product or service
- When you call or exchange emails with us, we will retain the content of the email messages (or hard copy correspondence) as required or permitted by law and our record and information management policies. We also may retain recordings of our phone messages or phone calls with you.

#### Information We Collect When You Visit Our Site or View Our Online Advertisements

We, Regal Credit Management and the third parties we engage to perform analytics or advertising use cookies or similar technologies to administer and improve our Site and the content on it, including to track user movements around the Site, to gather usage information and statistics about how our Site is used, to permit users to log in or make purchases, to store user preferences, to customize content, and for marketing and advertising purposes. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We may combine the information we have automatically collected from you with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality, to develop new products and services, and to customize content and advertising to you.

The following are some examples of information we may collect with Cookies, log files, Web Beacons, GIFs, pixel tags, server logs, customer relationship management ("CRM")



tools or other technologies that gather information automatically when you visit our Site or view online advertisements:

- Website pages you view
- IP address
- Emails from Regal Credit Management that you open or forward
- Regal Credit Management offers or links you connect to

In connection with the Site, for example during the enrollment process or upon log into your member portal, information about your computer, such as the device ID and other accompanying technical attributes and characteristics, may be accessed, retained and used by us or our service provider to confirm device identification, verify your identity, and to authenticate your account.

## Information we collect from other sources ("Third Party Information")

We may obtain information about you from third party sources, such as the companies we work with to provide service to you (i.e., our service partners), affiliates such as our subsidiary, ID Analytics and other companies that we acquire or merge with, data aggregators or public databases. Here are examples of this kind of Third Party Information:

- Name
- Age
- Postal Address
- Phone Number
- Information used to populate our membership registration forms
- Information such as your social security number and date of birth, obtained from our subsidiary, ID Analytics, other affiliates or service partners.



#### How We Use and Share Your Information

We will share your personal information with third parties only in the ways that are described in this privacy policy, or otherwise where we have your consent. We do not sell your personal information to third parties. When we share your Personal Information with third parties, we put in place contracts with them that include confidentiality restrictions on their use of your information and that require them to notify us if your Personal Information is lost, stolen or otherwise wrongly disclosed.

## **Security Standards**

The security of your Personal Information is important to us and we have put into place multi-layered technical, physical and procedural measures to help keep it safe. For example, we keep Personal Information encrypted during transit and at rest using strong encryption technology and employ proactive monitoring and other tools to protect against unauthorized access. We work with third parties on an ongoing basis to keep our practices current and undergo annual third-party audits that examine our practices on security and privacy.

Despite our mutual efforts, you understand and agree that perfect security does not exist and understand that there is a certain amount of risk inherent in providing and receiving services over the internet. The Services depend upon your commitment to keep your Personal Information safe. You agree to use your Personal Information in a reasonable way and to avoid recklessly disclosing your Social Security number, financial account numbers or other Personal Information to those that could improperly use or disclose it. For example, take care not to visit sites that may transmit malware, or to respond to "phishing" scams, unsolicited emails, or pop-up messages requesting your Personal Information. You may have the opportunity to participate in blogs, promotions or other functions by way of the Site. Use caution when deciding to disclose your information in such a submission as these functions may be provided by a Third-Party Website and subject to terms which are different than those stated in this Privacy Policy.



If you have any questions about the security of your Personal Information or the security of the site, or to report a potential security issue, please email us at <u>info@regalcredit.com</u>. If you have a potential security issue, please describe the matter in as much detail as possible and include any other data that might be helpful. If you are having problems accessing your account, please contact our office.

#### Referrals

If you choose to use our referral service to tell a friend about our Site, we will ask you for your friend's email address. We will automatically send your friend a one-time email inviting him or her to visit the Site. We store this information for the sole purpose of sending this one-time email. Your friend may contact us at <u>info@regalcredit.com</u> to request that we remove this information from our database.

## Social Media

Our Site may include Social Media Features, such as the Facebook Like button and widgets, such as the "Share this" button or interactive mini-programs that run on our Site. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly and for other purposes. Social Media Features and Widgets are displayed on our Site, but are hosted by the third party identified in the widget. These Social Media Features and Widgets are subject to their own privacy policies, not this one, and their privacy practices may differ from those on this Site.

## Testimonials

We display personal testimonials of customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at <u>updates@regalcredit.com</u>.



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# **Children's Privacy**

We believe it is important to provide added protection for children on the internet and encourage parents and guardians to work with their children to understand how to be safe online. Our Site is not intended for the use by anyone under the age of eighteen (18) but parents or guardians may enroll minors for certain Services we offer. Other than as specifically described herein, we do not want or intend to collect or request Personal Information from anyone under the age of eighteen on this Site.

## Marketing

If you provide us with your email address or mailing address, you may receive marketing messages and materials from us or our affiliates. You have choices on what communications you want to receive from us. Marketing materials for our Services may also be included in messages you receive from our partners (which may include your employer if they offer our services as part of their employee benefits) or service providers that offer our services as part of a special offer. If you choose not to receive marketing communications that we send, we will honor your request. However, we will continue to communicate with you as needed to provide the Services, respond to your inquiries or otherwise relay service related messages. You may still receive information about our Services through other parties using their own mailing lists. You can stop receiving promotional email or postal communications from us by following the instructions included in each communication, by changing your preferences in your member portal, by contacting us at 1-800-843-0677 or by regular mail at, Regal Credit Management, 1270 Avenue of The Americas, 7th FL, New York, NY 10020.

#### **Special Notice to California Consumers**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information to third parties for the third parties' direct marketing purposes. We may share your Personal Information with our affiliates for direct marketing, but we do not sell it to or share it with unaffiliated third parties. You may request a list of our affiliates by contacting us at Regal Credit



Management, 1270 Avenue of The Americas, 7th FL, New York, NY 10020. You may make one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. Please allow up to thirty (30) days for a response.

#### **Your Access to Your Information**

Upon request Regal Credit Management will provide you with information about whether we hold any of your personal information. You may access, update, and correct the Personal Information you have provided to us on the Site by logging into your member portal and selecting the account or member information options. If you are not a member and want to know what Personal Information we have about you, you need to contact us in writing by postal mail with this request at the address set out in the "Contact Us" paragraph below. We will respond to your inquiry within ten business days. If you cancel your Services, we may retain your information in accordance with this section. We will retain your information as follows:

- for as long as your membership is active
- as needed to provide you Services
- as required by company policy or legal obligation
- as needed to resolve disputes
- as needed to enforce our agreements

## **Contact Us**

If you have any questions about this Policy, please contact us at 1-800-643-0677, at <u>info@regalcredit.com</u>, or by mail at Regal Credit Management, 1270 Avenue of The Americas, 7th FL, New York, NY 10020. You hereby agree that we may use and disclose any suggestions, ideas, concepts, or information (other than your Personal Information) that you provide to us regarding the Privacy Policy, our business, or any other matter, without obligation to you or any third party.



## **Definitions Used in this Policy**

**Cookies**. Cookies are small text files that are stored by a user's web browser on the hard drive of a user's computer. Cookies can "remember" what information ("Cookie Information") a user accesses on a particular web page to simplify subsequent interactions with that website by the same user, or cookies can use that information to streamline the user's transactions on related websites. The cookies we use on our Site may be "session" cookies that are erased when you leave the Site, or they may be "persistent" cookies that remain on your computer's hard drive after you leave the Site. The cookies we use do not capture your Personal Information. We may also set cookies when you register at the Site, and may do so without notice to or permission from you or any third party.

**General Information** refers to information about your use of the Site that is gathered automatically. General Information does not identify you individually, but helps us better understand how the Site is used.

Our, We or Us refers to Regal Credit Management.

**Personal Information** means information, or a combination of pieces of information, that reasonably could allow us to identify you. Personal Information includes things like your name, address, date of birth, social security or driver's license number.

**Third Party Information** refers to information that may be gathered on our behalf or which we lawfully obtain from third parties outside of this Site.

**Tracking Technologies** refers to technologies such as Cookies, JavaScript, Web Beacons (including clear GIFs), E-Tags, Local Storage (HTML5), and Flash Local Storage Object (LSO) cookies.

Site refers to this website, www.regalcredit.com



**Services** refers to the services offered by Regal Credit Management through <u>www.regalcredit.com</u> and offline, including our identity protection services, credit monitoring services, or other products or services for which you must register or enroll, as well as any on-line promotions that are associated with our Services, unless we tell you otherwise.