

## TEGO Certified, Inc. Privacy Policy for Users

### Your Privacy Rights

Last Updated: 3/22/10

TEGO Certified, Inc. respects the privacy of our consumer users and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy. As an individual who is a user of our websites (including, but not limited to, TEGOCertified.com), or otherwise, as a user of the services provided by TEGO Certified, Inc., this Privacy Policy is intended to describe for you:

- the information we collect about you;
- the manner in which that information may and may not be used;
- with whom it may be shared;
- how you may access the information you provide us; and
- your choices about such uses and disclosures.

When using our websites or services or when transacting business with us, we encourage you to read this Privacy Policy carefully. By using our websites, you are deemed to have accepted the practices described in this Privacy Policy.

If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

### INFORMATION WE COLLECT ABOUT YOU

**In General.** We collect personal information that identifies you, such as your name and e-mail address, as well as other information that does not identify you. When you provide personal information through our websites, the information may be sent to TEGO Certified servers located in the United States and other countries around the world.

- **Information You Provide About Yourself.** We may collect and store any personal information you enter on our websites or provide to us in some other manner. This includes identifying information (such as your name, home or mailing address, e-mail address, and telephone number), information about your home or prospective home, information about your payment method (valid credit card number, type, expiration date or other financial information).
- **Information You Provide About Others.** We may also collect and store personal information that you provide to us about other people (such as co-borrowers), including their name, address, phone number, or other personal information.
- **Use of Cookies and Other Technologies to Automatically Collect Information.** We and our authorized service providers, advertising companies, and ad networks use various technologies to collect information from your computer and about your activities on our websites (see "Information Collected by Third Parties" below). We and these companies automatically collect information from your browser when you visit our websites. This information includes your IP address, your browser type and language, access times, the

content of any undeleted cookies that your browser previously accepted from us or them (see "Cookies" below) and the referring website address.

- **Cookies.** When you visit our websites, we may assign your computer one or more cookies -- to facilitate access to our websites, to personalize your online experience, and/or to record information about your visit to our websites. Through the use of a cookie, we and these companies also may automatically collect information about your online activity on websites, such as the web pages you visit, the links or advertisements you click, or the other actions you conduct while on websites. These cookies do not store any personally identifiable information about you. If you choose to **decline cookies**, please note that you may not be able to sign in or use some of the interactive features offered on our websites.
- **Other Technologies.** We may use standard Internet technology, such as **web beacons** and other similar technologies, to track your use on our websites. We also may include web beacons in promotional e-mail messages or newsletters to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer our websites' visitors to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities.
- **Information Collected by Third Parties.** We may allow third parties, including our authorized service providers, advertising companies, and ad networks, to display advertisements and other materials on our websites, and to deploy technology for our benefit -- for example, to load web pages more quickly. We and these companies may use tracking technologies, such as **cookies**, to collect information about users who view or interact with these advertisements and/or connect to our websites. Our websites do not provide any personal information to these third parties. This information allows us and these companies to deliver and gauge, among other things, the effectiveness of targeted advertisements. Some of these third party advertising companies may be advertising networks that are members of the **Network Advertising Initiative**, which offers a single location to opt out of ad targeting from member companies.

## **HOW WE USE THE INFORMATION WE COLLECT**

**In general.** We may use information that we collect about you to:

- deliver the products and services that you have requested;
- manage your customer relationships and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us, other TEGO Certified, Inc. companies or other third parties;
- develop and display content and advertising tailored to your interests on our websites and other websites;

- verify your eligibility and deliver prizes in connection with promotions, contests and sweepstakes;
- enforce our terms and conditions;
- manage our business and
- perform functions as otherwise described to you at the time of collection.

**Financial Information.** We may use financial information to match you with lenders and closing agents, or otherwise as needed to manage our business.

**Job Applicants.** If your personal information is submitted through our websites when you apply for a position with us, the information will be used solely in connection with the consideration of and acting upon your application. We may retain your personal information for a period of time, but only for the purpose of considering your application for current or future available positions or as required by law.

Please review “Your choices about collection and use of your information” below.

#### **WITH WHOM WE SHARE YOUR INFORMATION**

We want you to understand when and with whom we may share personal or other information we have collected about you or your activities on our websites or while using our services.

**Personal Information.** We do not share your personal information with others except as indicated below or when we inform you and give you an opportunity to opt out of having your personal information shared. We may share all types of personal information with:

- **Authorized Service Providers.** We may share your personal information with our authorized service providers that perform certain services on our behalf in connection with the TEGO Certified services. These service providers may include lenders, title companies, flood or other insurance providers, appraisal companies, escrow companies, closing agents, other financial institutions, marketing and customer services firms, credit card payment processors, as well as companies that support contests, sweepstakes, surveys, or other features offered through our websites, or that provide business analysis or website support. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purpose.
- **Business Partners.** When you express interest in products, services or promotions offered through our websites or our services, we may share your expression of interest with the businesses with which we partner to offer you those products, services, promotions, contests and/or sweepstakes, and, as applicable, their affiliates and third-party finder or marketing companies. When you elect to engage in a particular offer or program, you are deemed to have authorized us to provide your e-mail address and other information to those businesses.
- **Other TEGO Certified, Inc. Businesses.** We may share information we collect, including personal information, with other TEGO Certified, Inc. companies (some of which are non-financial companies). Sharing information with the TEGO Certified, Inc. companies enables us to provide you with information about a variety of products and services that might interest you. All TEGO Certified, Inc. companies comply with this Privacy Policy. The TEGO

Certified, Inc. companies also will comply with applicable privacy and security laws and, at a minimum, in any commercial e-mail they send to you, will give you the opportunity to choose not to receive such e-mail messages from that company in the future. However, in no circumstance will TEGOCertified.com share with other TEGO Certified, Inc. companies any personally identifiable information that you provide to us if that information bears on your creditworthiness.

- **Special Notice to California Residents.** TEGOCertified.com will not share any personal information about you with other TEGO Certified, Inc. companies to the extent prohibited by applicable California law or to the extent your prior consent to share is required by applicable California law.
- **Special Notice to Vermont Residents.** TEGOCertified.com will not share any personal information about you with other TEGO Certified, Inc. companies to the extent prohibited by applicable Vermont law or to the extent your prior consent to share is required by applicable Vermont law.
- **Other Situations.** We also may disclose your information:
  - In response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.
  - When we believe disclosure is appropriate in connection with efforts to investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; or to enforce our websites' terms and conditions or other agreements or policies.
  - In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, asset sale or in the unlikely event of bankruptcy.

Any third parties to whom we may disclose personal information may have their own privacy policies that describe how they use and disclose personal information. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Privacy Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside the United States.

**Aggregated and Non-Personal Information.** We may share aggregated information (i.e., information about you and other customers collectively, but not specifically identifiable to you) and other non-personal information we collect under any of the above circumstances. We may also share it with third parties and TEGO Certified, Inc. companies to develop and deliver targeted advertising on our websites and on websites of third parties. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and

investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to our websites and the most popular features or services accessed. This information does not contain any personal information and may be used to develop website content and services that we hope you and other users will find of interest and to target content and advertising.

**Third Party Websites.** There are a number of places on our websites where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement or a search result on our websites, you may be taken to a website that we do not control. These third party websites may independently solicit and collect information, including personal information, from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the "privacy" link typically located at the bottom of the webpage you are visiting.

## **YOUR CHOICES ABOUT COLLECTION AND USE OF YOUR INFORMATION**

- You can choose not to provide us with certain information, but that may result in your being unable to use certain features of our websites because such information may be required in order for you to obtain products or services from us.
- Federal and state regulations require that we store completed Loan Request Forms (LRFs) for various periods of time. In order to comply with these requirements, we may be unable to delete your information from our database until the expiration of the applicable period.
- When you initially use our websites, you will be given a choice as to whether you want to receive e-mail messages or newsletters from us. You may later modify your choice by contacting our Customer Care Department at 888-986-4623. You also will be given the opportunity, in any commercial e-mail that we send to you, to opt out of receiving such messages in the future. It may take up to 10 days for us to process an opt-out request. We may send you other types of transactional and relationship e-mail communications, such as conditional loan offers, requests for additional information, service updates or announcements, administrative notices and surveys, without offering you the opportunity to opt out of receiving them. Please note that opting out of receipt of promotional e-mail communications will only affect future activities or communications from us. If we have already provided your information to a third party before you have changed your preferences or updated your information, you may have to change your preferences directly with that third party.
- Under our Do Not Call policy, you may instruct us not to call you for marketing purposes by calling our Customer Care Department at 1-888-983-4623. We will implement your instructions within 30 days. We have policies and procedures in place and train our employees to honor your request. Please note that we may still need to call you for servicing or other non-marketing purposes.
- If you do not want us to send you postal mail for marketing purposes, you may remove your name from current and future mailing lists by contacting our Customer Care Department at 1-888-983-4623.

## **HOW WE PROTECT YOUR PERSONAL INFORMATION**

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees and authorized third party service providers are permitted to access personal information, and they may do so only for specified permitted business functions. We use encryption in the transmission of your sensitive personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information.

We want you to feel confident using our websites to transact business . However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information, searches or other communications will always remain secure. Users should also take care with how they handle and disclose their personal information. Please refer to the [Federal Trade Commission's website](#) for information about how to protect yourself against identity theft.

## **OTHER INFORMATION ABOUT OUR PRIVACY PRACTICES**

**California Residents.** If you are a resident of California, in addition to the rights set forth in this Privacy Policy, you have the right to request information from us regarding the manner in which we share certain categories of personal information with third parties for their direct marketing purposes. California law gives you the right to send us a request at a designated address to receive the following information:

1. the categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year;
2. the names and addresses of the third parties that received that information; and
3. if the nature of the third party's business cannot be determined from its name, examples of the products or services marketed.

We may provide this information in a standardized format that is not specific to you. The designated e-mail address for these requests is [privacy@tegocertified.com](mailto:privacy@tegocertified.com).

### **Children's Privacy**

Our websites are general audience sites, and we do not knowingly collect personal information from children under the age of 13.

### **Visiting our Websites From Outside the United States**

This Privacy Policy is intended to cover collection of information on our websites from residents of the United States. If you are visiting our websites from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and to those third parties with whom we share it as described in this privacy policy.

### **No Rights of Third Parties**

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of our websites.

### **Changes to this Privacy Policy**

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. If we make any material changes in the way we collect, use, and/or share personal information that may impact you, we will notify you by sending an e-mail to the e-mail address you most recently provided us in your account, profile or registration (unless we do not have such an e-mail address), and/or by prominently posting notice of the changes on our websites. We recommend that you check our websites from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

### **How to Contact Us**

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us by e-mail or postal mail as follows:

#### **Privacy Officer**

TEGO Certified, Inc.  
4125 Blackhawk Plaza Circle  
Danville, California 94506

**or**

[privacy@tegocertified.com](mailto:privacy@tegocertified.com)

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