

Privacy Policy

The services offered by Madjarian+Associates Inc., include the www.virtualupauto.com website (the “Website”), and other features, content, or applications offered from time to time by Madjarian+Associates Inc. in connection with the Website (collectively, “Madjarian”). The Website and the Madjarian+Associates Inc. Services are owned by Madjarian+Associates Inc.. Please read this page carefully. By accessing the Website, you agree to the terms set forth in this Privacy Policy. This Privacy Policy does not apply to other Madjarian+Associates Inc. sites that have their own separate privacy policies or notices.

This Privacy Policy describes the types of Personal Information (as herein defined) and non-identifying information we collect on the Website, how information about you is collected and used when accessing the Website as a “Subscriber” (meaning you have voluntarily submitted your Personal Information to the Website in order to receive the Madjarian+Associates Inc. Services offered through the Website), with whom we share it, and the choices available regarding our use of the information. “Personal Information” means all personally-identifiable information (such as your name, address, employment information and mobile telephone numbers, birth date, user name, password, answers to our security questions, or e-mail address) that is submitted by Subscribers who access the Website. We also describe the measures we take to protect the security of the information and how to contact us about our privacy practices.

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This Website is not designed for or intended to attract anyone under 19 years of age. If you are under the age of 19, please do not provide information of any kind. We do not collect Personal Information from any person whom we actually know is under the age of 19.

Information Collected by Madjarian+Associates Inc.

- a. **Personal Information.** Your privacy is important to us. Madjarian+Associates Inc. does not collect Personal Information unless you voluntarily submit that information to Madjarian+Associates Inc. when you use the

Madjarian+Associates Inc. Services, send inquiries to Madjarian+Associates Inc., or participate in certain activities on the Website, such as applying for refinancing.

- b. ***Non-Identifying Information.*** When you visit the Website, Madjarian+Associates Inc. may automatically collect certain non-identifying information about you, such as your movement about the Website, the pages on the Website you visit most frequently, the type of browser or computer operating system you use, or the domain name of the website from which you linked to the Website. When you request pages from our server, the server automatically collects some non-identifying information about you, including your IP address. IP addresses are used by computers on the network to send the requested pages to you. In addition, Madjarian+Associates Inc. may store small files on your computer's hard drive as "cookies" or similar types of files to track and target your interests and preferences. We may use cookies for the following purposes, among others: (a) remember Subscriber preferences, (b) statistically track the number of people accessing our Website, browser type used, and language preferences, (c) present information targeted to your interests, (d) measure the effectiveness of the Madjarian+Associates Inc. Services, and (e) provide other services and content that are available only through the use of cookies. If you object to this practice, please consult your browser's documentation for instructions on erasing or blocking cookies. We recommend, however, that you allow cookies to be stored on your computer as they may be needed to properly use the Website and the Madjarian+Associates Inc. Services.

How Madjarian+Associates Inc. Uses the Information Collected

We may use the information we obtain through the Website to:

- Create and manage your Subscriber account;
- offer and provide Madjarian+Associates Inc. Services to you;
- communicate with you about, and administer your participation in, surveys, refinancing, and other offers;
- display content on our Website;
- respond to and communicate with you about your inquiries and request and provide information you request;
- operate, evaluate and improve the Website, the Madjarian+Associates Inc. Services and our business (including developing new products and services; enhancing and improving the Madjarian+Associates Inc. Services; managing our communications; and performing data analytics);
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and our policies.

In addition, we use information collected online through cookies and other automated means for purposes such as (i) customizing Subscriber visits to our Website, (ii) delivering content tailored to Subscriber interests and the manner in which Subscribers browse our Website, and (iii) managing the Madjarian+Associates Inc. Services and our business. We also use this information to help diagnose technical and service problems, administer the Website, identify users of our Website, and gather demographic information about our Subscribers.

We may use third party web analytics services on this Website, such as those of Google Analytics. The service providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze how Subscribers use the Website. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to evaluate use of the Website. You may deactivate the ability of Google Analytics to analyze your browsing activities on this Website. To learn more about Google Analytics, and exercise your choices with respect to their collection of information on this Website, please click here <https://tools.google.com/dlpage/gaoptout>.

Third Party Sites

The Website may contain links to third party websites for your convenience and information. Madjarian+Associates Inc. is not responsible for the websites' content, any use of the websites, or the privacy policies or practices on such websites. When linking to a third-party website, we strongly recommend that you review the privacy policy on that website. This Privacy Policy only governs Personal Information, user content and non-identifying information collected on the Website.

Disclosure of Personal Information Collected by Madjarian+Associates Inc.

- a. ***Disclosure of Your Personal Information.*** Madjarian+Associates Inc. never sells, trades, transfers, discloses or otherwise provides any information (personal or non-identifying) to any other party for that party's independent use without your permission, except as described here. Personal Information that is voluntarily submitted by you is used by us only to fulfill your request(s) or for the purpose(s) indicated on the page where the information is requested. In addition, Information Madjarian+Associates Inc. gathers may be used for our business and marketing purposes. Additionally, Madjarian+Associates Inc. may transfer, disclose or share certain Personal Information with our third party service providers for the sole purpose of performing functions on our behalf based upon our instructions. These third parties have access to, use and disclose only the Personal Information needed to perform services on our behalf or comply with legal requirements, but are prohibited from using it for any other purpose. These functions may include responding to credit inquiries, analyzing data, or providing web hosting and marketing services.

When we engage third parties to store or process Personal Information, our

policy is to have in place contractual provisions with those service providers limiting the purposes for which the information is being transferred to them and stipulating security requirements for that information.

- b. **Data Transfers.** We may transfer the personal information we collect about you through the Website to countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information and in some countries, your personal information may be accessed by governments, law enforcement authorities or the courts. When we transfer your personal information to other countries, we will protect the information as described in this Privacy Policy. If you have any questions regarding our policies and practices relating to transfer of personal information, please contact us as specified in the How to Contact Us section.
- c. **Reservation of Rights.** Notwithstanding the foregoing or any other statements or representations here or elsewhere on the Website, Madjarian+Associates Inc. reserves the right to disclose any Personal Information about you in our possession (i) if we are required to do so by laws or legal process; (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to enforce or apply our Terms of Use and other agreements or protect the rights, property, or safety of the Website, our Subscribers, or others.

This includes exchanging Personal Information with other companies and organizations for fraud protection, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

Security

Madjarian+Associates Inc. has administrative, technical and physical safeguards in place to protect Personal Information that you submit to the Website against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. All Personal Information submitted to the Website or in connection with the Madjarian+Associates Inc. Services is accessible only by those Madjarian+Associates Inc. employees (such as our credit, marketing and customer service personnel and technical staff) and third-party service providers authorized with special access rights to such systems and who are required to keep such information confidential. We retain Personal Information as long as is required for the purposes identified when you provided the Personal Information, and for any new purposes identified by us and consented to by you, unless a longer retention period is required or permitted by law. Notwithstanding the foregoing, Madjarian+Associates Inc. cannot guarantee the security of your Personal Information, your non-identifying information, or any user content you submit to Madjarian+Associates Inc. through the Website. When you communicate with Madjarian+Associates Inc. electronically, your communication is not necessarily secure and is subject to all of the risks of electronic communication, such as unauthorized entry or use, hardware or software failure, and other factors that may compromise the security of Personal Information at any time. Madjarian+Associates Inc. assumes no

responsibility for the security of any Personal Information you submit to the Website. Madjarian+Associates Inc. reserves the right to update or otherwise alter our security practices if and when it seems appropriate.

Access and Correction

Subject to applicable law, you may (i) have the right to access certain personal information we maintain about you and obtain a copy of that information, (ii) update or correct inaccuracies in that information, (iii) object to our use of your personal information, and (iv) block or delete your personal information from our database. To exercise these rights, please contact us as indicated in the How to Contact Us section of this Privacy Policy. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information.

Your Choices

We offer you certain choices in connection with the personal information we collect from you, such as how we use the information and how we communicate with you. To update your preferences, ask us to remove your information from our database or submit a request, please contact us as specified in the How to Contact Us section of this Privacy Policy.

Changes to This Privacy Policy

We continue to implement new technologies and improve the services and features we provide. This Privacy Policy may be updated from time to time without prior notice to you to reflect these changes. If there are changes or additions to this Privacy Policy, we will post a prominent notice on our Website to notify you of any significant changes to our Privacy Policy and we will those changes here and indicate at the top of the Privacy Policy when it was most recently updated so that you will always know what information we collect, how we use it, and what choices you have. It is your responsibility to review our Privacy Policy for changes. By continuing to access or use the Website as a Subscriber, you agree to be bound by this Privacy Policy.