



Corporate Website Privacy Policy
80-004 Rev 06.2009.01

1. Purpose

1.1. The SWC Website Privacy Policy exists to inform SWC website users of how we use and secure their information.

2. Scope

2.1. This policy applies to all SWC websites and web based services.

3. Policy

3.1. Users acknowledge their consent to the SWC Corporate Website Privacy Policy and the SWC Website Terms of Use by using these sites. Users should carefully review this Policy as well as the SWC Website Terms of Use and if they do not consent, should discontinue their use of these sites immediately.

3.2. SWC User privacy is important to us, and we are committed to protecting the personal information you choose to share with us. We have adopted the following privacy policy for the collection and use of all information regarding Users and their activities at our websites. This policy tells you what information we may gather from you, how we may use or disclose that information, and our efforts to protect it.

3.3. Information SWC may gather and utilize includes:

3.3.1. Site Usage Data

3.3.1.1. We may collect non-identifiable information to measure how our Users use our websites. This information may include statistics about the numbers and timing of unique visits to SWC websites, repeat visits, and which pages are viewed.

3.3.2. IP Address Data

3.3.2.1. SWC may collect and use your IP addresses to detect and respond to security issues, analyze trends, administer the site, track user's movement, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

3.3.3. Operating System and Web Browser Data

3.3.3.1. SWC may collect information pertaining to the type of operating system and Web browser you are using and other non-personally identifiable technical



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specification information to prevent the attempt to deliver advertising that may not work on your computer.

3.3.4. If you request a payment, we may also collect your name, address, telephone number and other information required to complete the transaction.

3.3.5.

3.4. How we use your personal information

3.4.1. Your registration other data is closely protected.

3.4.2. SWC reserves the right to disclose information as required by law, or to the extent that we believe in good faith that such disclosure is legally required or necessary to protect others' rights or property.

3.4.3. SWC does not rent your data or information to third parties.

3.4.4. SWC may share your payment account and related information with third parties as required to process payments you may initiate through our site. This information is used only to process your payments and is not shared or disclosed for any other purpose.

3.4.5. SWC does not store any payment account numbers in its system in order to maximize the security of that information.

3.5. SWC does not engage in individual web user "profiling".

3.6. SWC does not deliver or install "spyware" or any other software on your computer to monitor your Web use.

3.7. SWC does not sell or rent personally identifiable information about Users, such as email address, name, phone number and street address.

3.8. SWC websites and/or services may contain links to other websites. SWC is not responsible for the privacy practices of such other sites. We encourage our Users to be aware when they leave our SWC websites and to read the privacy statements of every site. This Privacy Policy applies solely to information collected by SWC websites.

3.9. Users can view and update their personal information at any time by signing in to your SWC account and changing your Profile.



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- 3.10. SWC must communicate at times with Users to provide important information about how to use the site, updates, and other important User information.
- 3.11. Your SWC registration or account information is password-protected for your privacy and security. The security of your SWC account relies on your protection of your SWC password. Any disclosure of your password to a third party may result in access to your registration or account Information or execution of transactions. SWC uses industry-standard 128 Bit SSL-encryption to protect data transmissions of financial and other information.
- 3.12. Users should direct any questions about the Privacy Policy, the practices of this Site, or your dealings with this Site, to Privacy@SW-Credit.com.
- 3.13. SWC and its service providers may employ the use of Cookies to collect information about Users and their use of the SWC website and its features. "Cookies" are small computer files that SWC transfers to your computer that allow us to know how often you visit the website and the activities you conduct while on the SWC website. Cookies from SWC or other websites can be managed by resetting the web browser to either notify the user when a cookie is received, thereby allowing the user to accept or reject the cookie at the time it is presented, or by having the user's web browser reject the cookie immediately on presentation.
- 3.14. SWC maintains Security Policies and Procedures that include but are not limited to:
 - 3.14.1. Security management processes to prevent, detect, contain and correct security violations.
 - 3.14.2. Information Security awareness training is conducted for all appropriate SWC staff.
 - 3.14.3. Contingency Plans for disaster recovery and business continuation.
 - 3.14.4. Evaluation of business procedures and associated systems on a periodic basis.
 - 3.14.5. Business Associate Agreements are required to be signed by our contractors.
 - 3.14.6. Facility Access Controls limiting building and computer room access.
 - 3.14.7. Specific internal application security controls to limit access to data.
 - 3.14.8. Physical device and media controls concerning the receipt and removal of hardware or data.



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3.14.9. Access controls – security software that denies or permits electronic application or data access.

3.14.10. Security audit controls and reporting of electronic information systems.

3.14.11. Person or entity authentication maintained by user sign-on and password.

3.14.12. Data transmission security governed through network and firewall infrastructure.

3.15. SWC reserves the right to amend this policy from time to time without notice. To view our current Privacy Policy clicks the Privacy Policy link from any page within the SWC website.

4. Definitions

4.1. SWC-abbreviation for Southwest Credit Systems, L.P.

4.2. User or Users – all SWC clients, employees, contractors, consultants, vendors, temporary staff, and guests who utilize SWC IT Resources. Throughout this policy the term “User” or “Users” will be used to collectively refer to any or all such individuals.

4.3. SWC IT Resources – Any and all printed SWC information, online display devices, magnetic or other storage media, and all computer-related activities involving any device capable of receiving email, browsing Web sites, or otherwise capable of receiving, storing, managing, or transmitting electronic data including , but not limited to, mainframes, servers, personal computers, notebook computers, hand-held computers, personal digital assistants (PDA’s), pagers, disturbed processing systems, network attached and computer controlled equipment (i.e. embedded technology), telecommunication resources, network infrastructures and devices, telephones, fax machines, printers, and service providers. Additionally they are the procedures, equipment, facilities, software, and data that are designed, built, operated, and maintained to create, collect, record, process, store, retrieve, display, and transmit information.

4.4. SWC Data and Information – All information or electronic data stored, transmitted, processed, provided to or otherwise used by SWC its clients, employees, contractors, consultants, vendors, temporary staff, and guests in rendering services. This includes all client information shared with SWC in any format or medium.

4.5. SWC IT – Acronym for Southwest Credit Services LP, Information Technology department.