

# Privacy Policy

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## **Introduction**

This privacy policy has been compiled to better serve those who are concerned with how their ‘Personally identifiable information’ (PII) is being used online. PII, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

Protecting your private information is our priority. This Privacy Policy, effective as of May 28, 2018, provides you with details of how we collect and process your personal data through your use of our site: [www.lencred.com](http://www.lencred.com), including any information you may provide through our site when you sign up to our newsletter, download an eBook, or fill in any information on our site. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

By providing us with your data, you warrant to us that you are over 13 years of age. LenCred Inc., is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

## **Who's responsible for my data protection?**

LenCred Inc. sees that users data on this website are protected, and that we are always in compliance with the regulations set aside for users personal information.

What personal information do we collect from the people that visit our blog, website or app? When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, phone number or other details to help you with your experience. In most cases, phone numbers are optional and not required. Personal data means any information capable of identifying an individual. It does not include anonymized data.

We may process certain types of personal data about you as follows: Identity Data may include your first name, maiden name, last name, and username. Contact Data may include your billing address, delivery address, email address, and telephone numbers. Technical Data may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.

Profile Data may include your username and password, your interests, preferences, feedback and survey responses. Usage Data may include information about how you use our website, and services. Marketing and Communications Data may include your preferences in receiving marketing communications from us and your communication preferences.

#### **Sensitive Data**

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offenses. Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when

requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

### **Collecting personal information**

The following types of personal information may be collected, stored, and used: Information about your computer including your IP address, geographical location, browser type and version, and operating system; Information about your visits to and use of this website including the referral source, length of visit, page views, and website navigation paths; Information, such as your email address, that you enter when you register with our website; Information that you enter when you create a profile on our website—for example, your name, gender, birthday, interests and employment details; Information, such as your name and email address, that you enter in order to set up subscriptions to our emails and/or newsletters; Information that you enter while using the services on our website; Information that is generated while using our website, including when, how often, and under what circumstances you use it; Information relating to anything you purchase, services you use, or transactions you make through our website, which includes your name, address, telephone number and email address. Information that you post to our website with the intention of publishing it on the internet, which includes your username, comments, and the content of your posts; Information contained in any communications that you send to us by email or through our website, including its communication content and metadata; Any other personal information that you send to us. Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy

**When do we collect information?**

We collect information from you when you register on our site, subscribe to a newsletter, respond to a survey, fill out a form or enter information on our site.

**We collect data about you through a variety of different methods including:**

Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by mail, phone, email or otherwise, including when you: order our products or services; create an account on our site; subscribe to our service or publications; request resources or marketing be sent to you; enter a competition, prize draw, promotion or survey; or give us feedback.

Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies. Please read up about cookies [here](#).

**How do we use your information?**

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

To personalize user's experience and to allow us to deliver the type of content and product offerings in which you are most interested.

1. to allow us to better service you in responding to your customer service requests;
2. to administer a contest, promotion, survey or other site feature;
3. to send periodic emails regarding your order or other products and services;

4. sending you non-marketing commercial communications;
5. where we need to perform the contract between us;
6. sending you email notifications that you have specifically requested;
7. sending you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
8. dealing with inquiries and complaints made by or about you relating to our website;
9. keeping our website secure and prevent fraud;
10. verifying compliance with the terms and conditions governing the use of our website;
11. necessary for our legitimate interests to keep our records updated and to study how customers use our products/services;
12. to administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);

If you submit personal information to us, we will only use that information in accordance with the license you grant to us. Your privacy settings can be used to limit the use of your information on our website and can be adjusted by contacting us. We will not supply your personal information to any third party for their or any other third party's direct marketing. Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at [info@lencred.com](mailto:info@lencred.com)

#### **How do we protect visitor information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

#### **International data transfers**

Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy. As of 2018 we solely operate in the United States and have never had a client outside of the U.S.

#### **Retaining personal information**

1. 1. This Section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of personal information.
2. 2. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
3. 3. Without prejudice to article (2) above, we usually delete personal data if you opt out
4. 4. Notwithstanding the other provisions of this Section G, we will retain documents (including electronic documents) containing personal data:
5. a. to the extent that we are required to do so by law;
6. if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

### **Amendments**

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may notify you of changes to this policy by email or through the private messaging system on our website.

### **Third party websites**

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

### **Updating information**

Please let us know if the personal information that we hold about you needs to be corrected or updated.

### **Do we use ‘cookies’?**

Yes. Cookies are small files that a site or its service provider transfers to your computer’s hard drive through your Web browser (if you allow) that enables the site’s or service provider’s systems to recognize your browser and capture and remember certain information. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted

by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. We use both session and persistent cookies on our website.

For instance, if we had an e-commerce site we could use cookies to help us remember and process the items in your shopping cart. Cookies are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Our website uses cookies. The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

We use trusted third party services that track cookies on our website to recognize a computer when a user visits our website.

**Most browsers allow you to refuse to accept cookies—for example:**

In Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking “Tools,” “Internet Options,” “Privacy,” and then “Advanced”;



In Firefox (version 24) you can block all cookies by clicking “Tools,” “Options,” “Privacy,” selecting “Use custom settings for history” from the drop-down menu, and unticking “Accept cookies from sites”; and

In Chrome (version 29), you can block all cookies by accessing the “Customize and control” menu, and clicking “Settings,” “Show advanced settings,” and “Content settings,” and then selecting “Block sites from setting any data” under the “Cookies” heading.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

You can delete cookies already stored on your computer—for example:

In Internet Explorer (version 10), you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>);

In Firefox (version 24), you can delete cookies by clicking “Tools,” “Options,” and “Privacy”, then selecting “Use custom settings for history”, clicking “Show Cookies,” and then clicking “Remove All Cookies”; and

In Chrome (version 29), you can delete all cookies by accessing the “Customize and control” menu, and clicking “Settings,” “Show advanced settings,” and “Clear browsing data,” and then selecting “Delete cookies and other site and plug-in data” before clicking “Clear browsing data.”

**We use cookies to:**

Understand and save user's preferences for future visits.

Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies.

If you disable cookies, some features will be disabled. It could affect the users experience that make your site experience more efficient and some of our services will not function properly.

### **Third Party Disclosure**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### **Third party links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. When you leave our website, we encourage you to read the privacy notice of every website you visit. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>. We have not enabled Google AdSense on our site but we may do so in the future.

### **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. – See more at:

<http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

**According to CalOPPA we agree to the following:**

Users can visit our site anonymously

Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our website.

Our Privacy Policy link includes the word 'Privacy' and can be easily be found on the page specified above.

1. Users will be notified of any privacy policy changes on this page.
2. Users are able to change their personal information:
3. By emailing us
4. By logging in to their account

#### **Marketing Communications**

You will receive marketing communications from us if you have:

1. Requested information from us or;
2. If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
3. In each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for their own marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or OR by emailing us at [info@lencred.com](mailto:info@lencred.com) at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

#### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

#### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **Data Retention**

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

1. Request access to your personal data.
2. Request correction of your personal data.
3. Request erasure of your personal data.
4. Object to processing of your personal data.
5. Request restriction of processing your personal data.
6. Request transfer of your personal data.
7. Right to withdraw consent.

If you wish to exercise any of the rights set out above, please email us. We try to respond to all legitimate requests quickly. Occasionally it may take us longer than a week, if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**How does our site handle do not track signals?**

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

**Does our site allow third party behavioral tracking?**

It's also important to note that we do not allow third party behavioral tracking.

**COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13.

**Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify the users via email within 7 business days

We will notify the users via in site notification within 1 business day

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

#### **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

Send information, respond to inquiries, and/or other requests or questions. Market to our mailing list or continue to send emails to our clients after the original transaction has occurred

To be accordance with CANSPAM we agree to the following:

1. NOT use false, or misleading subjects or email addresses
2. Identify the message as an advertisement in some reasonable way
3. Include the physical address of our business or site headquarters
4. Monitor third party email marketing services for compliance, if one is used
5. Honor opt-out/unsubscribe requests quickly



6. Allow users to unsubscribe by using the link at the bottom of each email

If at any time you would like to unsubscribe from receiving future emails, you can Email us at [info@lencred.com](mailto:info@lencred.com) and we will promptly remove you from all future market-related correspondence.

#### **Contacting Us**

If there are any questions regarding this privacy policy you may contact us using the information below.

LenCred, Inc.

[lencred.com](http://lencred.com)

3101 SW I Street

Suite 1

Bentonville, AR 72712

[info@lencred.com](mailto:info@lencred.com)

**UNSUBSCRIBE:** [unsubscribe@lencred.com](mailto:unsubscribe@lencred.com).