Privacy Policy Effective Date: 02/04/2013

This Privacy policy applies to <u>www.vinsmart.com</u>, owned and operated by NOBEL Systems Inc. ("Nobel Systems"). This privacy policy describes how Nobel Systems collects and uses the personal information you provide on our Web site <u>www.vinsmart.com</u>. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

We care deeply about our users' privacy concerns. NOBEL Systems Inc. has been awarded TRUSTe's Privacy Seal signifying that this privacy policy and practices have been reviewed by TRUSTe for compliance with <u>TRUSTe's program requirements</u> including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program covers only information that is collected through this Web site, <u>www.vinsmart.com</u>. The TRUSTe program does not cover information collected via any mobile applications.

TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. *If you have questions or complaints regarding our privacy policy or practices, please contact us at* <u>support@nobelsystems.com</u>. If you are not satisfied with our response you can contact <u>TRUSTe here</u>.

Information Collection and Use:

We collect information from our customers to process orders and better serve you with pertinent information, such as order confirmations and order status updates. Information collected includes your name, billing address, telephone numbers, e-mail address, and payment information such as your credit card number.

The information collected during our VIN-Smart Report Order process will be used to complete your order(s). During the order process, you will have to provide financial information such as your credit card number and expiration date. If we have trouble processing an order, we will use this contact information to get in touch with you. To properly process your credit card information, we must share your personal and financial information with the merchant bank for authorization and approval. This process is protected by an enhanced security system. See the Security section below for more details on security measures and procedures.

Sharing with 3rd Parties:

We may employ third party companies to perform functions on our behalf. These functions may include order fulfillment, marketing assistance, customer service, data analysis, and credit processing. The third parties we contract for these purposes have limited access to your personal information and may not use it for other purposes.

We may also disclose your personal information

- as required by law, such as to comply with a subpoena, or similar legal process
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request,
- to any other third party with your prior consent to do so.
- if Nobel Systems is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information,
- to any other third party with your prior consent to do so

We will share your personal information with third parties only in the ways that are described in this privacy policy. We do not sell your personal information to third parties.

Access and Choice:

If your personal information changes you may correct, update and amend your information by emailing our Customer Support at <u>support@nobelsystems.com</u>. To request deletion of data, you may email customer service or contact us by telephone or postal mail at the contact information listed below. We will respond to your request within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Cookies and Tracking Technologies:

1st Party Tracking:

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We do not link the information we store in cookies to any personally identifiable information you submit while on our site.

We use both session ID and persistent cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time.

We set a session cookie to store your identity and information required to process the report, so you don't have to enter it more than once. We also use persistent cookies to track navigations and page numbers, so it remembers where you were from the recent clicks.

If you reject cookies, you may still use our site, but your ability to use some areas of our site, such as contests or surveys, will be limited.

Web Beacons:

We employ clear gifs (a.k.a. Web Beacons), images, and scripts that help them better manage content on our site. We do not tie the information gathered to our Customers' or Users' personally identifiable information.

Analytics:

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

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically-collected data to personally identifiable information.

3rd Party Tracking:

The use of cookies by our service providers is not covered by our privacy policy. We do not have access or control over these cookies. Our service providers use session ID cookies to make it easier for you to navigate our site, in order for you to use the shopping cart, etc.

Security:

Nobel Systems takes precautions to protect its customers' information. When you submit sensitive information via the website, your information is protected both online and offline. When our registration/order form asks you to enter sensitive information (such as your credit card number), that information is encrypted and is protected with encryption software currently available in the industry – SSL. However, no method of transmission over

the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Please refer to the icon on the home page for more information. If you have any questions about security on our Web site, you can contact us at support@nobelsystems.com

Additional Info:

Links to other Websites:

Our Site includes links to other Web sites whose privacy practices may differ from those of <u>www.vinsmart.com</u>. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

Social Media Widgets:

Our Web site includes Social Media Features, such as the Facebook Like button and the "Share this" Widget. Among other things, you may refer our website to your friends and upload your email address book using these widgets. 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. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

Changes to this Privacy Policy:

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact us:

If you would like any additional information about Nobel System's privacy policy or have any questions or comments, please email us at support@nobelsystems.com or use the information below:

Phone: (888) 950-9550

Customer Support--Monday - Friday 8:30AM - 6:30PM ET

NOBEL Systems, Inc. 55 N. Gilbert Street Suite 4201 Tinton Falls, NJ 07701