



# JEFFERSON HOLDING

This privacy policy regulates Jefferson Holding, Inc. collection, use and disclosure of non-public personal information (NPPI as defined below) that was received or collected by us from our current and former clients regarding our current and former clients. Jefferson Holding, Inc. reserves the right to change this privacy policy at any time, so we recommend that you review it often. If we make any changes to this policy, you will be notified here or by means of an announcement on our homepage.

The information we collect and how we collect it

Jefferson Holding, Inc. collects the following NPPI:

1. Information that you provide such as personal contact information
2. Information regarding your transactions with us or any of our affiliates
3. Information regarding your transaction with, non affiliate third-parties, which we disclose in order to fulfill a transaction that you have requested
4. Information collected from any consumer reporting agency

Traffic data

Traffic data is information that does not identify you personally, but may include your IP address, ISP and other types of information that help us administer our site. Jefferson Holding, Inc. automatically tracks and collects traffic data. We use cookies and web beacons to track traffic data and customers transactions for accounting purposes.

Any NPPI information that could identify a client or former client is not revealed in the collection and use of any traffic data. We may share anonymous traffic and transaction information with our affiliates on an accumulative basis for marketing, accounting and site-effectiveness.

Non-public personal information

NPPI includes and information:

1. You may provide to receive a service
2. About you resulting from any transaction involving a service
3. That we collect about you in order to provide a service that you request.

This type of information does not include any information that is collected anonymously or for the purpose of tracking information on our website. For you to access most of the products and services available through this site, you may be required to provide NPPI such as:

Name  
Address  
E-mail address  
Phone number  
Employer and length of time you worked there  
Number of years at your current address  
Credit history  
US Citizenship  
Military service  
Loan amount and purpose  
Social security number  
Drivers license number  
Bank account or routing number  
Date of birth  
Debit or credit card number, expiration date and 3 digit codes

We use this information to identify you, to complete any requests for services, process requests for other products or services, and for customer service satisfaction.

Types of information we disclose

Jefferson Holding, Inc. may disclose the NPPI that we collect about you to our affiliates or non-affiliated third-parties, as described below, and as otherwise allowed by law.

1. To affiliates and service providers who perform professional services for us, such as demographic analysis for marketing purposes and accounting.

We automatically encrypt NPPI, such as your social security number, driver's license number, expiration dates and security codes.

Jefferson Holding, Inc. will not sell, rent or otherwise disclose your NPPI to third-parties except as explained in this privacy policy and as allowed by law.

Why we request your e-mail address

Reasons we use your e-mail address

1. Confirming your identity.
2. Sending you notifications on the status of your transaction.
3. Contacting you if we need any assistance to complete your transaction.
4. Sending you newsletters and customer related material allowed by law.

When it comes to email abuse, Jefferson Holding, Inc. has a zero tolerance policy. If you receive any unsolicited e-emails from Jefferson Holding, Inc. please report it immediately to us at support@JeffersonHolding.com. We are, however, not responsible for any communications you may receive from any non-affiliated third-parties.

Jefferson Holding, Inc. will never request you to provide NPPI in an e-mail. PLEASE DO NOT RESPONDS to an e-mail that appears to be from us requesting NPPI. Contact us immediately a by e-mail at support@JeffersonHolding.com.

We will not store e-email addresses from e-mails that are sent to us. If you contact us by e-mail, then we will respond by email. Jefferson Holding, Inc. will not store or use your email address in our database from such correspondence.

Choices you have in regards to the use of your information

E-mail correspondence. Opt-out e-mails in one of two ways:

1. Use the "uncheck" box next to the offer that you complete
2. Use the "unsubscribe hyperlink" in the e-mail that you receive.

When you unsubscribe, you will receive a confirmation e-mail indicating your decision to opt-out.

Confirmations. There is no option to opt-out of these types of e-mail messages because they are used to confirm your identity and your request to enter into a transaction. Confirmation emails may contain important instructions regarding your transaction. If you are not agreeable to receive these confirmation e-mails, please do not sign up for any services or products on this web site.

Access to your identifying non-public personal information

If you decide to change or delete your identifying NPPI, including your e-mail address, you may do so by contacting the non-affiliated third-party that processed your request. Any information that you entered on the Jefferson Holding, Inc. website will be updated every time you apply for a new or different service.

We reserve the right to disclose any of your NPPI, including your e-mail address, without your consent for the following reasons:

1. To comply with Federal, State, or local laws, rules and other applicable legal requirements; or
2. To comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by Federal, State, or local authorities; or
3. To respond to judicial process or government regulatory authorities having jurisdiction for examination, compliance, other purposes as authorized by law; or
4. To our service providers to verify the integrity of the information collected; or
5. To our affiliated business partners for accounting purposes.

Special note regarding any non-U.S. users and U.S. law

The regulations and laws of different countries and states apply different requirements on the use of the internet and data productions. Jefferson Holding, Inc. is located in Colorado, in the United States of America, along with the servers that make this web site available worldwide. The laws of the State of Colorado and, the United States of America, regulate all matters relating to this web site. If you provide any information while using this

site, you will be determined to have authorized the transfer of your information to our servers in Colorado.

#### Minors

Jefferson Holding, Inc. does not knowingly solicit any information from minors or send them requests for any information. There may be links to other sites that offer services to persons under the age of 18; however Jefferson Holding, Inc. will not offer any services for any persons under the age of 18.

This privacy policy applies to JeffersonHolding.com

This privacy policy applies to the website <http://JeffersonHolding.com> and the users of this site. It will not apply to any other web site whether it is a site that you may have linked to, or a site that may be linked to this site. Jefferson Holding, Inc. will not be responsible for the privacy practices on any other site, company or person. We recommend that you learn about the privacy policies of any site you visit or companies that operate those sites.

#### Privacy policies and non-affiliate third-parties

This privacy policy applies only to Jefferson Holding, Inc. website and it may be different than that of non-affiliate third-parties to which your NPPI may be disclosed to process the service you request. Jefferson Holding, Inc. encourages you to review the privacy policy of every website you visit, in which you are required to disclose your NPPI in order to obtain a product or service.

#### Use of this website

Using this web site represents to us that you are an adult under the laws of the jurisdiction where you reside and that you have reviewed the terms of this privacy policy and the Terms and Conditions posted on this site. Please do not use this website or disclose any of your NPPI if the terms of this privacy policy are not acceptable to you or if you do not agree to all provisions of our Terms and Conditions.

#### Protecting your identifying non-public personal information

We advise you to take all necessary precautions to protect your identifying NPPI, both on and off the internet.

#### Contacting us

Please contact us if you have any questions or concerns regarding this policy. Contact the customer service department by email at [support@JeffersonHolding.com](mailto:support@JeffersonHolding.com) , or by mail at

Jefferson Holding, Inc.  
6934 Teller Court  
Arvada, CO, U.S.A.

#### Security

Jefferson Holding, Inc. is a Thwart® secured website and uses a Thwart® SSL Certificate for encryption. Customer data is securely transmitted by Jefferson Holding, Inc. to non-affiliated third-parties as permitted by this privacy policy or by law and to service providers through combination of encryption techniques and other privacy protection measures. Selected NPPI submitted through the Jefferson Holding, Inc. website such as your Social Security number, drivers license number, bank account or routing number, and debit or credit card numbers, expiration dates are encrypted.

Jefferson Holding, Inc. also maintains and enforces strict internal policies to protect NPPI from unauthorized access by employees or third-parties.

#### Cookies

Jefferson Holding, Inc. uses cookies, or small text files maintained by your web browser, to enhance your interaction with this website. Some cookies are stored on your hard drive. You may reject or refuse cookies and still visit our website. However if you reject cookies you may not be able to access all of the services on our website.

Some of the companies that offer products or services via our websites, and some of the companies that send visitors to our website pass cookies to your computer. Please be aware that we have no control over cookies passed to you from other companies' sites.

If you request information or purchase a product or service, you will be requested to enter NPPI on our website. Selected NPPI is linked to the cookie stored on your computer so it will be easier for you to complete a transaction, you may have to re-enter selected NPPI which is not linked to cookies stored on your computer.

#### Encryption

Jefferson Holding, Inc. uses encryption to secure selected NPPI such as social security numbers, driver's license numbers, and credit card data. Encryption is a way to scramble data to make it unreadable to anyone other than the intended recipient. If it is intercepted by a third-party while traveling over a network it cannot be read. Only the persons sending and receiving the encrypted data have a key to unscramble the data and make it readable. Encryption provides privacy for email, discussion group postings, and other communications as they move over networks. Jefferson Holding, Inc. uses industry standard SSL, AES and RSA encryption.

#### Secure Sockets Layer

Secure Sockets Layer, (SSL#8217;) is the industry standard method for protecting web site communications by encrypting information thus making it unreadable to anyone except the holders of the keys used to read the information. Jefferson Holding, Inc. uses the SSL protocol to capture selected NPPI, such as your credit card numbers via the Internet.

#### SSL Certificate

A SSL Certificate binds an entity to a pair of electronic keys that can be used to encrypt and sign digital information. A SSL Certificate makes it possible for you to verify that we have the right to use a given key, helping to prevent others from using phone keys to impersonate us.

### Third data Sources

We use third-parties to verify the integrity of selected NPPI you provide so we can confirm your identity.

### Web-beacons

A web beacons is a tracking marker that is placed within a web page or in an email message. Web beacons are invisible to your eye, and are used to monitor a computer which is accessing a particular web page or email message and transfer the data to a server. Jefferson Holding, Inc. uses web beacons to :

Count website visits at Jefferson Holding, Inc. website; track and account for transactional information on the websites of non affiliate third-parties or service providers; collect aggregate transactional data for accounting purposes; track statistic about:

- The IP address of the computer that fetched the web beacon
- The URL of the page that the web beacon is located on
- The URL of the web beacon
- The time the web beacon was viewed
- The type of browser that fetched the web beacon image
- A previously set cookie value

This privacy policy was most recently updated on Feb 1st, 2012