Your privacy is important to Top100creditrpair.com (The terms, “we”, “us” and “our” throughout this document mean Top100creditrpair.com). Please read our Privacy Policy carefully to understand how we collect, use, disclose, transfer, and store your information. By visiting our website or agreeing to content that includes a link to this document (“Online Ads”), you agree to the practices described in this Privacy Policy and our Terms of Use. (Specific state privacy protections are listed in Section 13 of this Privacy Policy).

1. Our Collection and Use of Personal Information

Personal Information includes information you provide us that can be used to uniquely identify or contact a single person, such as your name, address, email address, phone numbers and Social Security Number.

You may be asked to provide Personal Information when you interact with us, Online Ads, or one of our related companies, such as in connection with a completed or abandoned transaction or a request for information from us. CreditRepair.com and its related companies and service providers may share your Personal Information with each other and use it consistent with this Privacy Policy.

We may supplement the Personal Information you provide with Personal Information available from other sources, such as credit bureaus, public databases, data aggregators, and other commercially-available sources.

2. Examples of Personal Information We Collect and How We Use It

You may provide us a variety of Personal Information, including your name, mailing address, email address, phone number, payment information, and Social Security Number.

The Personal Information we collect allows us to verify your identify, deliver requested products and services, and provide you information and offers from Service Providers and Related Companies. These are financial and non-financial companies that assist us in providing services to Top100creditrpair.com members along with other third-party companies with whom Top100creditrpair.com has a contractual relationship to provide marketing offers to Top100creditrpair.com members. It also allows us to stay in contact with you, and to manage Top100creditrpair.com’s relationship with you. By providing us with Personal Information, you consent to our transfer and storage of that information.

Email

We also may use your Personal Information for research, development, and analysis, and for advertising, marketing, security, fraud prevention, and other business activities.

For example, we may use your email address to:

* Confirm your identity;
* Send you information on the status of your account or transaction;
* Contact you if we need your assistance to complete a transaction; and
* Send you newsletters, third party marketing offers from service providers and related companies, and customer-related material as permitted by law.

We have a zero tolerance policy for email abuse. If you receive unsolicited emails from us please report it to us. We are not responsible for communications you may receive from non-affiliated third parties.

We will never ask you to provide Personal Information in an email. DO NOT RESPOND to an email that appears to be from us requesting Personal information. Contact us immediately at 321-348-5488

3. Our Collection and Use of Non-Personal Information

Non-Personal Information is information in a form that does not allow for direct association with a specific person. This information is compiled and analyzed on both a personal and an aggregated basis. We may collect, use, monitor, analyze, transfer, and disclose Non-Personal Information for any purpose.

4. Examples of Non-Personal Information We Collect and How We Use It

We may collect and aggregate information regarding user access, activity and behavior on our website, such as when you visit the website and what content is of interest or seems to be most useful to you. If we combine Non-Personal Information with Personal Information, the combined information is treated as Personal Information for purposes of this Privacy Policy.

Non-Personal Information includes:

Device Information – We may collect specific information for the device you use to access our website. For example, we may collect device model, operating system version, application software, and fonts.

Cookies and Other Technologies – We use a variety of technologies to collect and store information when you visit our website. This technology may involve sending web beacons and cookies or anonymous identifiers to your device. We use Cookies and Other Technologies to analyze your behavior when accessing our website and to deliver ads to you that we believe relate to your interests.

Log Information – When you visit our website, we collect certain information automatically and store it in log files. This information includes IP address, browser version, ISP data, referring and exit pages, operating system version, date / time stamps, cookie data, and clickstream data. We use Log Information to administer the website, analyze trends, maintain site security, learn about user behavior, and improve the overall quality and availability of the site.

Click-Through URLs – In some email messages, we use a Click-Through URL to link to content on our website. When you click one of these URLs, you pass through a separate web server before reaching our site. We use Click-Through URLs to help us determine interest in a particular topic and to measure the effectiveness of our email communications.

Anonymized Information – If we separate Non-Personal Information from Personal Information, the resulting Anonymized Information is treated as Non-Personal Information for purposes of this Privacy Policy.

5. Our Sharing of Information with Others

**Personal Information**

We do not share Personal Information with businesses or individuals outside of Top100creditrpair.com, except under the follow circumstances:

Consent – We will share your Personal Information with others when we have your consent to do so.

Service Providers – We provide Personal Information to related companies and other trusted businesses or persons who use, analyze, or process it on our behalf, based on our instructions and in compliance with appropriate confidentiality and security measures. For example, we may use others to:

* deliver, evaluate the effectiveness of, and assist in improving our products and services;
* conduct consumer research and satisfaction surveys;
* assist us in analyzing and understanding consumers and how to reach them more effectively;
* assist us in fraud prevention, with our security measures, and to provide us technical support;
* provide member support;
* manage member data, and to ensure data integrity and accuracy;
* process financial transactions and perform accounting functions; and
* advertise, market, or make product or service offerings.

Legal Reasons – We will share Personal Information with others if we have a good-faith belief that disclosure is necessary or appropriate to:

* comply with applicable law, regulation, legal process or enforceable governmental request;
* protect our operations or members:
* detect, investigate, or address fraud, security, or technical problems; or
* investigate potential violations of and enforce applicable terms of service.

In the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

**Non-Personal Information**

We may share Non-Personal Information publicly and with our strategic partners. For example, we may share Non-Personal Information to describe the size and success of our company.

6. Transparency and Choice

We may use third-party display advertising companies, including web platforms, to serve our ads on its behalf on sites across the Internet. Our display advertisers and we use cookies to inform, optimize, and serve ads based on your past visits to our website.

You may find additional information, opt-out of, or otherwise customize display advertising from web platforms by visiting the web platform’s ads preference manager.

You may find additional information and opt-out of other participating third-party display advertising by visiting the [Network Advertising Initiative opt-out page](http://www.networkadvertising.org/choices/).

We may use third-party analytics companies, such as Google Analytics, Adobe, and Omniture to analyze and understand user behavior when visiting our website.

You may find additional information and opt-out of Adobe Analytics by visiting the [Google Analytics opt-out browser add-on](http://tools.google.com/dlpage/gaoptout/).

You may find additional information and opt-out of Omniture Analytics by visiting the [Adobe opt-out page](http://www.adobe.com/privacy/opt-out.html#4).

You also may disable cookies within your browser. Please note, however, that certain features of the CreditRepair.com website will not function properly or be available once cookies are disabled.

7. Social Media Plug-ins

Plug-ins for social networks, such as Facebook, Twitter, LinkedIn, Yahoo, Windows and Google plus (among others), are integrated on Top100creditrpair.com’s website.

By interacting with us through a social media plug-in, certain information will be transmitted to the related social network, and you permit us to have on-going access to information from your social network profile.

If you do not want the social network to collect information about you, or to share it with Top100creditrpair.com and other third parties, please review the privacy policy of the relevant social network and/or log out of the relevant social network before you visit our site.

8. Information Security and Retention

We take precautions to safeguard your Personal Information from loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. These precautions include technical, physical, and administrative procedures.

Because email and instant messaging are not recognized as secure communications, we request that you not send private information to us by email or instant messaging services.

We regularly review our compliance with our Privacy Policy and enforce internal safeguards.

We are committed to working with appropriate regulatory authorities to resolve any complaints regarding the transfer of Personal Information that we cannot resolve with you directly.

We use Secure Sockets Layer (SSL) encryption on all pages where Personal Information is collected. This protects the confidentiality of your Personal Information while it is transmitted over the Internet.

For your own protection, you should exercise care with the information you share over the Internet. You should always use a secure browser and exercise good judgment in using passwords, such as using a combination of upper and lower case letters, numbers, special characters, and you should avoid using the same or similar passwords across multiple sites. We recommend using a password between 12 and 16 characters long.

You may access your Personal Information by logging into your account. We make good-faith efforts to give you ways to update or to delete your Personal Information quickly, unless we need to keep that information for a legitimate business or legal purpose. Some changes require personal contact with an assigned CreditRepair.com representative.

We retain Personal Information and Non-Personal Information for the time necessary and reasonable to fulfill the purposes outlined in the Privacy Policy, unless a longer retention period is required or permitted by law or ethical duties, including our duty to preserve case files for a reasonable time and relevant information necessary to preserve a legal claim or defense. Our data retention for such information is seven (7) years.

We may reject requests to change or delete information that are unreasonably repetitive, require disproportionate technical effort (for example, requiring the development of new systems or fundamental changes to existing systems), risk the privacy of others, or would be extremely impractical (such as information stored on backups).

We work to protect data from accidental or malicious destruction. Accordingly, we may not immediately delete or change residual copies and we may not delete or change information from our backup systems. Unless a disproportionate effort is required, we will provide information access and correction without charge.

9. Third Party Privacy Policies

This Privacy Policy only addresses the use and disclosure of information we collect from you. This policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions before you disclose your personal information to others. For more information about each such third party, please refer to the third party’s privacy policy.

If you provided your information on the website of an entity not related to CreditRepair.com, and that entity shared your information with us, the privacy policy of that website governs the non-related entity’s use of your information, which may be different from this policy.

10. Children

We do not knowingly collect Personal Information from children under 13. If we learn that we have collected the personal information of a child under 13, we will take steps to delete the Personal Information as soon as possible.

11. Privacy Policy Changes and Questions

We may update our Privacy Policy from time to time. Changes to this Privacy Policy will be posted on our website, with a corresponding revision date. Please check the website and Online Ads each time you use them for the most current information and to ensure that you are aware of any updates.

12. Request for Information

If you have any questions or concerns about our Privacy Policy, please contact us: credit@topcreditrepair.com

Should you no longer wish to receive our emails, you may click on the unsubscribe link located in the footer of each email received or at email-preferences.

13. State Privacy Protections

**California Residents**

You have the right to know we will be collecting and maintaining personal information including credit report data to assist you with credit repair and maintenance services. We collect this information from you, credit bureaus, public databases, data aggregators, and other commercially available sources. The categories of this personal information include:

* Personal identifiers to authenticate your identity and obtain credit reports you have requested;
* Credit report data to assist with identifying and challenging unfair, unsubstantiated, and inaccurate items;
* Internet/Network activity to inform, optimize, and serve ads based on your past visits to our website (see, infra section 6. Transparency and Choice for additional information); and
* Audio and electronic information (to record your agreements and authorizations given over the phone or through our web pages).

**We do not sell any of your personal information without obtaining your specific consent, including personal information of minors under age 16. Because we do not sell PI without your express consent, we are not obligated to include the “Do not sell my personal information” link on our site’s homepage.**

We will share your personal information with our service providers when it is necessary to process your requests, maintain your case, or report to credit bureaus or your creditors. You have the right to request the following up to two times in a 12-month period:

* The categories of personal information we have collected about you in the past 12 months;
* The categories of sources from which we collect personal information;
* The business purpose for collecting or selling personal information;
* The categories of third parties with whom we share personal information;
* The specific personal information we have collected about you in the past 12 months;
* The categories of personal information that we sold about you and the categories of third parties to whom the personal information was sold in the past 12 months, or verification that no personal information was sold;
* The categories of personal information we disclosed about you for a business purpose in the past 12 months, or verification that no personal information was disclosed.

In addition, California residents have the following rights: (1) the right to request that Personal Information be deleted, subject to various exceptions including matters governed by the Gramm-Leach-Bliley Act (GLBA) or to comply with a legal obligation whether of general or specific applicability; (2) the right to request that Personal Information not be sold to third parties, if applicable; and (3) the right not to be discriminated against in light of choosing to exercise any of these rights.

To exercise any of these rights, contact us:

* by submitting the [California Data Requests](https://privacyportal-cdn.onetrust.com/dsarwebform/e5972974-adf3-405e-b919-62b20ae438a0/38c1c71c-29d6-4201-bcec-83123baf7007.html) form
* by calling 800-270-9679

When you make any of the above requests, we will verify your identity and right to request the information by asking you for information we can match with our records such as your name, phone number, Social Security Number, or date of birth. We may also verify you using your system login or other reasonable authentication service such as knowledge based authentication.

We will provide the requested information within 45 days of the request in most cases. If we need additional time to complete your request, we will notify you within the first 45 days and may take an additional 45 days to complete your request.

## You may authorize an agent to make a request under these rights on your behalf by completing a notarized Agent Authorization Form and submitting it with your California Data Request web form or mailing it to us at Top100creditrpair.com, Data Requests, P.O Box 531 7501 Citrus Ave Goldenrod, FL 32733

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By exercising your rights, you will not be denied services, provided a lesser level or quality of service, or charged a different price for services, including through discounts, benefits, or penalties unless the price difference is reasonably related to the value provided to you by your data. However, if you exercise your right to have your personal information deleted, we will not be able to continue to provide service, as our services are dependent on that personal information.

Please note that whereas we provide credit-counseling services, it is subject to obligations pursuant to the GLBA. The GLBA includes several definitions that will govern relevant privacy matters. Consequently, the terms “nonpublic personal information” or “personally identifiable financial information”, for example, will pre-empt the CCPA’s definitions of “personal information”, “sale”, or other important terms defined by the GLBA for matters involving services provided by us, our service providers, or agents.

**Nevada Residents**

## We are providing you this notice under Nevada state law. You may be placed on our internal Do Not Call List by contacting us at 877-219-6791. Nevada law requires we provide the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: 702.486.3132; email: aginfo@ag.nv.gov or Top100creditrepair.com, 2875 P.O Box 531 7501 Citrus Ave Goldenrod, FL 32733 321-348-5488

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