

Privacy Policy

We are committed to respecting and protecting your privacy, and it is our policy to comply with all applicable laws relating to privacy. In addition, in this privacy policy statement you will find further information on these areas:

What information we collect.

How we may use the information.

How we may share the information.

What types of security procedures are in place to protect the information.

How users can correct inaccuracies in the information.

What choices are available to users regarding collection, use, and distribution of the information.

How to contact us.

***Important note:** Our websites may contain links to other parties' sites. We are not responsible for the privacy practices of such other sites. We encourage you to read the privacy statements of each and every Website that collects personally identifiable information.*

A. Information We Collect

- 1) Information you provide. When you use any service or promotion that requires registration, we ask you for personal information (e.g., your name, email address, an account password). We may combine the information you submit under your account with information from our other services or third parties in order to fulfill your request, to provide you with a better experience, or to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.
- 2) Cookies. We may use cookies (small files containing character strings) to improve the quality of our service, including storing your preferences and tracking user trends.
- 3) Log-file information. When you access our services, our servers may automatically record the information that your browser sends whenever you visit any website. These server logs may include information such as your web request, IP address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- 4) Communications. If you send us messages, we may retain those in order to process your inquiries, respond to your requests, and improve our services.

B. Use of Information

We may use the information to provide you services, to communicate with you, or for other lawful purposes within the limits of this policy.

Communications from us:

Initial Account Confirmation

We may send you a welcoming email for your information, and if applicable, to confirm your user ID and/or password.

Newsletter, Products & Services

We may send a newsletter to users of certain services. If a user wishes to subscribe to our newsletter, we ask for contact information such as name and email address. We may also occasionally send you information on products or services. Out of respect for our users' privacy, we provide a way to opt-out of these communications (see Opt-Out and Correcting, below).

Service Announcements

On very rare occasions, it may be necessary to send out a strictly service-related announcement. For instance, if our service experiences a significant outage. Generally, users may not opt-out of these communications, though they can deactivate their account. However, these communications are not promotional in nature.

Customer Service

We communicate with users on a regular basis to provide requested services and in regard to issues relating to their specific account; we may communicate via email, mail, or phone.

Surveys

Depending upon which of our services you use and which of our sites you access, you may be permitted and/or invited to provide us with information and/or your opinions. Participation in these surveys is completely voluntary, but the information collected may be used consistent with this privacy policy. In the event we elect to use an intermediary to conduct these surveys, the intermediary will be prohibited from using personally identifiable information for any secondary purposes.

Additional information we may collect:

Profile

We may store information that we collect through cookies, log files and/or third parties to create a profile of our users. A profile is stored information that we keep on individual users that details their viewing preferences. Consequently, collected information is tied to the users personally identifiable information to provide offers and improve the content of the site for the user. This profile is used to tailor a user's visit to our website and to direct pertinent information to users. We do not share your profile with third parties, except as otherwise described herein.

Tell-A-Friend

We reserve the right to start a referral service. If you elect to use this referral service to tell a friend about our site, we'll ask you for the friend's name and email address. We will automatically send the friend a one-time email inviting him or her to visit the site. We store this information for the sole purpose of sending this one-time email and tracking the success of our referral program. The friend may contact our privacy officer (see contact information below) to remove this information from our database.

C. Sharing of Information

Aggregate Information (non-personally identifiable)

We may share aggregated demographic information about our user base with others. This information does not identify individual users. In doing this, we do not link aggregate user data with personally identifiable information.

Personally Identifiable Information

We will not sell your personally identifiable information to third parties without your permission.

We may share information with third parties in several instances:

- 1) when the service you are requesting inherently requires it, as when we submit your application for insurance to an insurance company;
- 2) when you expressly authorize and/or direct it;
- 3) in response to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims; and
- 4) when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, legal process, or as otherwise required by law.

Business Transitions

In the event we go through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, the information we have collected will likely be among the assets transferred. You will be notified via notice on our website of any such change in ownership or control of your personal information.

D. Security of Your Information

We subscribe to industry standards for the protection of personal information submitted to us, both during transmission and once we receive it. When you enter sensitive information (such as a credit card number and/or social security number) through our website, we encrypt that information using secure socket layer technology (SSL). Once received, information that is retained by us is

- (1) kept in a firewalled and intrusion-protected storage environment
- (2) accessed only by privacy-trained staff authorized to access it to fulfill your requests or otherwise perform our business functions, and
- (3) periodically reviewed for deletion in accordance with applicable law, contract requirements, and our internal data-retention guidelines.

E. Opt-out and Corrections

If you wish to opt-out of certain features of your account, if your personally identifiable information changes (such as zip code, phone, email or postal address), or if you no longer wish to use our service, we provide a way to correct, update or delete/deactivate personally identifiable information. This can usually be done online or alternatively by emailing us at the contact email address below.

F. Changes in this Privacy Statement

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

G. Contact Us

This privacy policy covers websites owned and operated by Carroll Enterprises, Inc. and its subsidiaries, including Small Business Service Bureau, Inc., Group Health & Benefit Administrators, Inc., Small Business Insurance Agency, Inc., and divisions thereof, including Pivot.com and SterlingBridge.com. To reach us regarding this privacy policy, please contact us at:

Email: privacy-officer@carrollenterprises.com

or mail us at
Privacy Officer c/o VP Finance
Carroll Enterprises, Inc.
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