

PRIVACY AND SECURITY POLICY

This Privacy and Security Policy is provided for the benefit of customers and clients of Car Title Loans (“Company”) as well as other consumers and parties who seek information from or about Company and/or its website(s).

1. OPENING STATEMENTS

1.1 Definitions. Across its various policies and Website, Company strives to use the same definitions for particular terms. By doing so, Company seeks to make its policies and governing documents consistent and user-friendly. For this reason, Company provides the definitions for these terms in one location and directs you to our Terms of Use for such definitions.

1.2 Our Commitment to Privacy. Company respects the privacy and the confidentiality of our customers’ information, particularly our customers’ personally identifiable information (also commonly referred to as personally identifying information) (“PII”). We are committed to keeping confidential the PII you share with us. This Privacy and Security Policy explains how Company collects, uses, discloses and protects the information we obtain.

1.3 Applicability of Privacy and Security Policy. Our Privacy and Security Policy applies to all individuals and entities from whom or for the benefit of whom we receive PII, whether it be collected through our corporate owned websites; traditional mailing and/or faxing channels; telephone or electronic communications; from some other medium; or from our clients.

1.4 Website Not Directed to Minors. The Website is a professional website directed toward adult individuals seeking to obtain a financial loan. As such, an individual must be aged eighteen (18) or over to create an account through the Website. As such, the Website is not directed toward children or minors.

2. PERSONAL INFORMATION COLLECTED AND HOW IT IS USED

2.1 Personally Identifiable Information (PII) is any information that would, by itself, identify you or tend to identify you as a particular individual or entity. This PII may include, but not be limited to, your name, your address, phone number(s), cell phone number, bank account information, personal financial information, and/or personal identification number (such as a social security number or driver’s license number).

2.1.1 PII does not include any public information that is readily attainable through federal, state or local public record distribution channels.

2.1.2 PII does not include any information that, by itself, could not identify you as a particular individual or entity.

2.1.3 PII also does not include raw data that becomes aggregated for statistical purposes and cannot, thereafter, be identified with you as a unique individual or entity.

2.1.4 Company does consider your Internet Protocol (“IP”) address to be PII and will treat it as such.

2.2 Collecting Information

2.2.1 Company collects information that is considered personally identifiable information and other information that, by itself, would not be considered personally identifiable information.

2.2.2 When you contact us and/or apply for services through our Website (“Website Services”), we collect information submitted by you including, but not limited to, your full name, email address, city/state/zip code, phone number, cell phone number, and information related to your vehicle. The foregoing information can generally be considered PII.

2.2.3 Prior to applying for a loan from our Participating Lenders, we may also collect your name, physical address, telephone number, cell phone number, personal identification number (such as a social security number or driver’s license number), email address, date of birth, driver’s license number and state, information about home ownership, citizenship status, employment information, personal financial information, active military information, amount and frequency of pay checks, vehicle information, merchandise pawn information, and information about your banking account. The foregoing information can also generally be considered PII.

2.2.4 We may also require you to provide copies of documents containing PII such as personal references, your driver’s license, vehicle registration, income statements or pay stubs, and photographs of vehicle.

2.2.5 In addition to the foregoing, Company also may collect your browser type and language; access times; information about areas of the site visited by users of the site; and, information about the links users may select to visit on the site. This information can generally be considered non-PII.

2.2.6 Whether PII or non-PII, we reserve the right to request additional information from you consistent with this Privacy and Security Policy

2.3 Using Information

2.3.1 PII

2.3.1.1 Company will explain how it intends to use PII either before it collects the information (such as in this Privacy and Security Policy) or contemporaneously with the solicitation of such information. Exceptions may exist where the intended use is obvious to a reasonable person.

2.3.1.2 We will use the PII collected only for the purposes explained to you. Further, we limit the collection of PII to only that information which is necessary for the purposes explained to you.

2.3.1.3 Generally, Company may use PII to identify our customers (this may preclude in certain circumstances the necessity to enter information more than once); provide the Website, Website Services, and/or its various features in the normal course of operations; operate or improve the Website and/or Website Services; send notifications related to the use of our Website and Website Services; submit information and/or outsource certain services to Participating Lenders; complete a transaction that has been requested; develop aggregate information; and/or as otherwise disclosed to you.

2.3.1.4 We also may use PII (and some non-PII) collected about you (a) as part of our efforts to keep Company safe and secure; (b) to provide you with location features and services, like telling you how far our nearest office or a Participating Lender may be; (c) to measure or understand the effectiveness of ads you and others see; (d) to provide the Website Services; (e) to provide content and features relevant to you; (f) to make suggestions to you and other users on Company; and (g) provide support.

2.3.1.5 Granting us this permission not only allows us to provide Company as it exists today, but it also allows us to provide you with innovative features and services we develop in the future that use the PII we receive about you in new ways.

2.3.1.6 We may use your PII to communicate with you for the foregoing and other reasons by email, text message, phone call, or other electronic, written or oral communication method, *unless you expressly indicate to Company not to use a particular method of communication.*

2.3.1.7 While you are allowing us to use the PII we receive about you, you always own all of your information. Your trust is important to us, which is why we don't share PII we receive about you with others unless we have: (a) received your permission; (b) given you notice, such as by telling you about it in this policy; or (c) removed your name or any other personally identifiable information from it.

2.3.1.8 We may also use the PII you provide in using the Website and Website Services to let you know by electronic mail, phone, text or other communication method of additional products and services about which you might be interested.

2.3.1.9 Unless we are required to do so by law, we shall not obtain your consent before collecting PII about you from parties other than Company. Rather, Company shall presume that you have previously provided such consent to any such third party from whom Company obtains such information.

2.3.1.10 Company restricts the use of your PII to Companys' personnel and its Participating Lenders.

2.3.1.11 We shall not sell your PII in the normal course of business operations. Should all or any part of Company' business operations be sold, this paragraph shall not restrict the transfer of your PII as part of the Website and/or business sold to a third party.

2.3.2 Non-Personally Identifiable Information

2.3.2.1 Company generally uses non-PII for analysis and statistical purposes designed to provide consumers and customers a better experience on our Website. Additionally, we may use aggregated information derived from PII to improve the Website, the Website Services, and related services.

2.3.2.2 Non-personally identifiable information collected by Company may be utilized without restriction.

2.3.2.3 Although non-PII can be used in a number of ways, you can be

assured that the use of the non-personally identifiable information cannot identify you as a particular individual.

2.3.2.4 Because non-PII cannot be used to identify you, Company may in its discretion provide non-PII to other persons or entities.

2.4 Disclosing Information

2.4.1 **We do not share PII we obtain from your use of our Website and/or Website Services with others except as described in this Privacy and Security Policy and the [Terms of Use](#).** In particular, we may share your PII with our Participating Lenders for purposes of providing you with the Website Services you seek.

2.4.2 Generally, Company may provide PII to other persons where (a) we have your consent; (b) the disclosure is necessary to complete a transaction requested; (c) we have obtained information from a third party (presuming that you have previously provided such consent to any such third party from whom Company obtains such information); (d) we are required or permitted to do so by law; (e) the Website and/or Website Services are used (i) in a manner that violates the Terms of Use or (ii) for purposes other than those for which they were specifically intended; and/or (f) the terms of this Privacy and Security Policy and/or the Terms of Use otherwise permit and/or provide for such disclosure.

2.4.3 **Business Transfers.** Company reserves the right to sell, transfer or otherwise share some or all of its assets, including personally identifiable information, in connection with a sale of assets; a merger, acquisition, or reorganization; or, filing for bankruptcy. You will have the opportunity to opt out of any such transfer if the planned processing of your information by the purchaser differs materially from that set forth in this Privacy and Security Policy.

2.4.4 **Legal Compliance.** Company may disclose any information about you and/or Content created by you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to: (1) comply with an order from a court of competent jurisdiction, regulatory agency, and/or other governmental authority; (2) respond to claims, court orders, or other legal process (including subpoenas); (3) enforce the terms of this and other Company agreements as well as to protect the property and rights of Company, its Participating Lenders, its Strategic Partners or other third parties; (4) protect, in Company's sole discretion, the public or any person from harm; (5) investigate, prevent, stop, or take other action regarding any action perceived to be fraudulent, illegal, unethical, or legally actionable in Company's sole discretion; and/or, generally, (6) comply with the law.

2.4.5 **Notice.** Unless restricted from doing so, Company will attempt to notify you before it releases any of your PII or Content pursuant to (1) and (2) in paragraph 2.4.4. only. In such cases, Company will also provide you with general information on how you may seek to block such a release of information and/or direct you to resources that can provide such general information. The provision of such general information to you is not and should not be construed as providing you with legal advice. Additionally, Company is under no other obligation to assist you in challenging or opposing a release of your information.

2.4.6 **Participating Lenders.** The Website and Website Services anticipate providing your PII to lenders that participate in our network ("Participating Lenders") to analyze your information for purposes of determining whether they can offer you a loan.

2.4.7 Strategic Partners. Company may employ, engage or retain certain trusted third parties (“Strategic Partners”) to perform functions and/or provide services on its behalf. Company will share PII with these Strategic Partners only to the extent necessary to perform the functions and/or provide the services for which they have been employed, engaged or retained. Company shall also secure contractual obligations from our Strategic Partners to maintain the privacy and security of the PII shared with them.

2.5 Information Obtained From Use of Company’ Websites

2.5.1 Cookies.

2.5.1.1 Cookies can be defined as bits of data stored on your computer that allow website(s) to identify your browser and session.

2.5.1.2 If you reject all cookies, you may not be able to use the Website Services or products that require you to “sign in” and you may not be able to take full advantage of all offerings.

2.5.1.3 Most browsers allow you to configure it to accept all cookies, reject all cookies, or notify you when a cookie is set.

2.5.1.4 The Website uses its own cookies for a number of purposes including, but not limited to:

- A. Requiring you to re-enter your password after a certain period of time has elapsed to protect you against others accidentally accessing your account contents;
- B. Keep track of preferences specified by our customers while using the Website;
- C. Estimate and report our total audience size and traffic; and,
- D. Conduct research to improve the content and services provided on the Website.

2.5.1.5 Many of our Participating Lenders and Strategic Partners may use cookies. Company maintains no control over the use of cookies by our Participating Lenders, Strategic Partners, and third-party advertisers. For information on how these third parties utilize cookies collected, you should examine their respective privacy policies.

2.5.1.6 Most web browsers automatically accept and collect cookies. Depending upon your web browser’s security settings, you may have the ability to reject all cookies.

2.5.2 Browser and Session Information. Company may collect information about your browser and session at the Website and/or in using the Website Services.

2.5.3 IP Addresses.

2.5.3.1 Company maintains a log of Internet Protocol (IP) addresses when

any corporate owned computers, servers, and/or websites (including, the Website) have been accessed. An IP address by itself does not allow us to collect additional PII about you.

2.5.3.2 IP addresses may be used for various purposes, including to:

- A. Diagnose and prevent service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP;
- B. Estimate the total number of users visiting a Company computer, server and/or website from specific geographical regions.
- C. Help determine which users have access privileges to certain content, services or resources offered; and,
- D. Monitor and prevent fraud and abuse.

2.5.3.3 OTHER THAN YOUR IP ADDRESS, COMPANY DOES NOT DIRECTLY COLLECT ANY PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOU UNLESS YOU VOLUNTARILY PROVIDE US WITH THIS INFORMATION.

2.7 Data Retention.

2.7.1. Company shall use commercially reasonable efforts to maintain storage information subject to the terms of this Privacy and Security Policy and the Terms of Use.

2.7.2. The length of time for which Company retains PII and other information will vary depending on the nature of the services for which the information has been collected and the nature of the information.

2.7.3. Although this period may extend beyond the end of your relationship with Company, it will be retained for only so long as necessary for Company to respond to any issues arising from your relationship with Company.

2.7.4. When Company no longer needs or requires your personal information, Company will destroy, delete, erase or convert information to an anonymous form without notice to you.

2.7.5. Depending on the Website Services used, Company may delete information including, but not limited to, stored messages and records of your account without notice to you. Company recommends that you back up on your own computer any critical and important information.

2.7.6. Should your account be terminated, Company may immediately and permanently delete all stored messages and records of your account without notice to you.

3. CONSENT

3.1. Company may obtain personal information about you through a variety of sources. For each source or method, the manner of consent may differ.

3.2. Car Title Loans may obtain personal information about you through a variety of

sources. For each source or method, the manner of consent may differ.

3.3. With respect to personally identifiable information you provide the Company, the Company now operates on an “Opt-in” basis. Prior to the Company collecting any personally identifiable information from you, you must acknowledge your agreement to the Company’s Privacy and Security Policy and the Company’s [Terms of Use](#). Consistent with these policies, the Company shall also presume that by providing the personal information requested (both personally identifiable and non-personally identifiable), you have consented to its use by the Company for the stated purposes.

3.4. For text messages, we operate strictly on an opt-in basis. This means that for the Company to send you text messages, as defined in the [Terms of Use](#), consistent with the Company’s Text Messaging Wireless Policy contained within its Terms of Use, we require you to provide us express consent to do so.

3.4.1.1. When you initially submit an application, you will be given the opportunity to authorize the Company to send you text messages to provide you with enhanced services, updates, and other information related to your application. To authorize the Company to send you such text messages, you must select this option by clicking the applicable box on the initial application. By clicking the applicable box, you shall have provided the Company express authorization to send you text messages consistent with our Text Messaging Wireless Policy.

3.4.1.2. Should you choose not to click the applicable box for receiving text messages, you shall have withheld your consent to receive text messages from the Company. In such a case, the Company will not send you text messages.

3.4.1.3. You may always later choose to receive text messages by providing us express consent to do so by sending an email to us at any time to gocall@mstpf.com.

3.4.1.4. Your application and/or the provision of services to you shall not be affected by your decision to provide the Company with consent to send you text messages. Moreover, the only feature not provided in the absence of express consent for Company to send you text messages shall be the ability to receive text messages from Company.

3.5. The Company does not utilize auto-dialed or pre-recorded phone calls to mobile or residential phone lines.

3.6. Where the Company obtains information about a consumer from its customers or other third parties, the Company presumes that the consumer has previously provided appropriate consent to the party from whom the Company obtains the information. However, with respect to any mobile number obtained from a customer or third party, the Company shall still require express consent to send text messages consistent with Section 3.3 above. In any case, the consumer can be assured that this *Privacy and Security Policy* applies to any information obtained from a third party.

4. ACCESS

4.1. Subject to certain limitations imposed by applicable privacy laws, you may request that Company provide you with a copy of your personal information and/or information regarding how we have used that personal information.

4.2. Any requests for access to information should be directed to our Privacy Officer at the contact information provided below.

4.3. We will make every effort to respond to your request in a reasonable timeframe.

5. SECURITY

5.1. Company takes the issue of protecting your anonymity and personal information very seriously.

5.2. Company protects the information it obtains about you with appropriate, commercially reasonable safeguards and security measures consistent with standard information practices. These measures include commercially reasonable technical and procedural steps to protect your data from misuse, unauthorized access or disclosure, loss, alteration, or destruction.

5.3. For security purposes, Company does not disclose all of its security measures. Be assured that Company does employ commercially reasonable industry standard measures to protect your information.

5.4. Your information will be stored on secure servers in the United States.

6. DISCLAIMER AS TO THIRD-PARTY WEBSITES

Although our corporate owned websites may contain links to other third-party websites and/or may be advertised on such third-party websites, Company is not responsible for the privacy practices or the content of such websites and specifically disclaims any such responsibility. Company does not monitor the privacy practices or content of these websites. If you have any questions about the privacy practices of a website other than a Company owned website, you need to contact the Privacy Officer of the website about which you have a question.

7. INCORPORATION OF OTHER APPLICABLE TERMS

Your use of the Website and Website Services is subject to this Privacy and Security Policy as well as the Terms of Use, the terms of which are incorporated herein by reference. You should carefully review the [Terms of Use](#).

8. PRIVACY OF CHILDREN

We make it a practice not to knowingly obtain and/or retain information about individuals under the age of eighteen (18). Indeed, no part of our Website or Website Services is directed to anyone under the age of eighteen (18).

9. ADDITIONAL INFORMATION

9.1 When you post content to the World Wide Web, you have the ability to post content which may include personally identifiable information about yourself. You are responsible for the information you post online or you share with another website that you link to from our website. You do so at your own risk. **Company warns you to be careful in posting information accessible to the public.**

9.2 If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties or other unwanted and possibly harmful contact. **Company warns you to be careful in posting information accessible to the public.**

10. REVISIONS TO PRIVACY AND SECURITY POLICY

10.1. Company reserves the right to revise, amend, or modify this Privacy and Security Policy, our Terms of Use, and other online policies and agreements at any time and in any manner.

10.2. Company shall provide notice of such changes by posting the revised policies to the applicable Company owned websites and by electronic mail.

10.3. With respect to this Privacy and Security Policy, you should visit our Website from time to time to review the then-current terms. At any time, the current-posted policies govern and shall be binding.

For Additional Information or Questions, Contact Our Privacy Officer

Company has a designated Privacy Officer. If you have additional questions or concerns regarding how Company is managing or using your personal information, please send your concerns in writing to our Privacy Officer by e-mail at qoscall@mstpf.com.

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