



PRIVACY POLICY

In this disclosure, you'll find details about our privacy policies and procedures, and instructions for changing how information about you may be shared. Please read this carefully, print and/or download a copy for your files.

SmartyPig, LLC is a licensee of the TRUSTe Web Privacy Seal Program:

- <http://www.truste.com/ivalidate.php?url=www.smartypig.com&sealid-101>

TRUSTe is an independent organization whose mission is to build user's trust and confidence in the Internet by promoting the use of fair information practices. This privacy statement covers the Web site www.smartypig.com. Because this Web site wants to demonstrate its commitment to your privacy, it has agreed to disclose its information practices and have its privacy practices reviewed for compliance by TRUSTe.



If you have questions or concerns regarding this statement, you should first contact SmartyPig Customer Support at 888-567-6278 or email privacy@smartypig.com. If you do not receive acknowledgement of your inquiry or your inquiry has not been satisfactorily addressed, you should contact TRUSTe at <http://watchdog.truste.com/pvr.php?page=complaint>. TRUSTe will then serve as a liaison with us to resolve your concerns.

SmartyPig Site Privacy Policy

We want you to make an educated choice, so please read this disclosure carefully to understand the options available.

- We do not share customer information with third-parties for their own marketing purposes.
- We may disclose the following information to our service providers: Information we receive from registration or other forms, such as your name, address, social security number and date of birth.
- We safeguard our customer information carefully.
- We are committed to protecting our customer information for every transaction, at every level of our organization. For this purpose, we have designed procedures, standards and technology, which are described in our policy.
- We are committed to helping you protect your privacy every day.

Information Collection

We begin by safeguarding the security and integrity of customer information that we collect such as your name, address, financial information, social security number, email address and date of birth. We are committed to protecting the security and integrity of customer information through procedures and technology designed for this purpose. For example:

- We limit employee access to customer information to those who have a business reason to know this information. Employees are required to honor our code of conduct, which includes standards to protect customer confidentiality. They are subject to disciplinary action if they fail to do so.

- We maintain policies and procedures covering the proper physical security of workplaces and records.
- We ensure our physical, electronic, and procedural safeguards meet or exceed federal standards regarding the protection of customer information.
- We require independent contractors and outside companies who work with us to adhere to strict privacy standards through their contracts with us. Privacy language is included in all contracts.
- We use technological means (such as backup files, virus detection and eradication software, firewalls, and other computer software and hardware) to protect against unauthorized access or alterations to customer data.

We collect and maintain customer information as part of servicing your account and your customer relationship. In the course of serving you, we collect information about you from a variety of sources, such as:

- Information you provide to us on applications or forms.
- Information we receive from an outside company, such as a credit bureau, regarding your credit history.
- Information about your transactions or experiences with companies partnering with SmartyPig.

Use of Information That We Collect

Certain areas and features of SmartyPig.com are available to you without registration or the need to provide to us any information. However, there are times in which we do collect personally identifiable information and are listed below:

- In order to setup a SmartyPig account and benefit from the full functionality of the site, you must register and in doing so, provide us with the following personally identifiable information; name, residential address, social security number, phone number, gender, birth date and email address. This information is used by SmartyPig to verify your identity and communicate with you regarding the services requested and other account related activities. Once registered you may choose to open a savings goal and fund that goal with a personal funding source. In doing so, you will provide us with the following personally identifiable information; bank routing and account numbers.
- In order to contribute funds to a SmartyPig users public savings goal you must provide us with the following personally identifiable information; name, billing address, credit card information, phone number, and email address. This information is used by SmartyPig to process your order.
- In order to purchase a SmartyPig gift card you must provide us with the following personally identifiable information; name, billing address, credit card information, phone number, and email address. This information is used by SmartyPig to process your order.

Profile Information

Once a user, you may provide additional information about your savings account(s), including what you are saving for, the savings category, if this is a public or private account, how much you wish to save, how much you have saved to date and when you wish to meet your goal.

Public Accounts

In order to invite others to contribute to your savings goals, you must designate a savings goal as being “public.” By doing so, you can then send e-mails to family members and friends inviting them to contribute to your public savings goal, or family and friends can locate your public savings goal by searching for your goal using your e-mail address. Your e-mail address will not

be made public. The names and e-mail addresses of people whom you invite will be used only to send your invitation and reminders. Users can control the amount of information that is displayed on their public savings goal-landing page, but it will not include more than the user's profile image, first name, last name, description of what they are saving for, the total goal amount, the current balance of the savings goal, the percent needed to reach the goal and SmartyPig "friends." All information that you enter or upload about your contacts will be covered by the same terms of this privacy policy.

Cookies & Log Files

Like most Websites, SmartyPig uses cookies and Web log files to track site usage. Due to the communications standards on the Internet, when you visit the SmartyPig Website, we automatically receive the URL of the site from which you came and the site to which you are going when you leave SmartyPig. We also receive the Internet Protocol (IP) address of your computer (or the proxy server you use to access the World Wide Web), your computer operating system and type of Web browser you are using, as well as the name of your Internet Service Provider (ISP). This information is used to analyze overall trends to help us improve the SmartyPig experience and our service to you. The link between your IP address and your personally identifiable information is never shared with third-parties without your permission unless when required by law. Our log files are not tied to personally identifiable information. Our cookies are tied to personally identifiable information in order to perform authentication into the site.

We use Google Analytics, a third-party tracking service, which uses cookies to track non-personally identifiable information about our visitors to our site in the aggregate to capture usage and volume statistics. Some of our business partners (e.g., Google Analytics) use cookies on our site. We have no access to or control over these cookies. This privacy statement covers the use of cookies by SmartyPig only and does not cover the use of cookies by any third-party.

Information About Your Friends

In order to invite others to your "friends" list, you will initiate a request from SmartyPig that they be added as a friend to your account. This information will be used by SmartyPig to send your one-time invitation. Your friend can then accept or deny the request. The names and e-mail addresses of people that you invite will be used only to send your invitation and will not be stored.

Testimonials

We receive permission to post testimonials prior to posting.

Blog

To post a comment, a user must include their name and email address. If you use a bulletin board, blog, or chat room on this Web site, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these forums. To learn more please read our Terms and Conditions.

SmartyPig Communications

SmartyPig will communicate with you through e-mail and notices posted on this Website. Please be aware that you will always receive certain e-mails from SmartyPig related to the proper function and activity of your account.

Customized Content

Information you provide at registration or in your Profile section may also be used to customize your experience on the Website.

Sharing Information With Third Parties

We collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms.
- Information about your transactions with us, our strategic partners or others.
- Information we receive from consumer-reporting agencies.
- Information we receive from identification verification agencies.

We do, however, disclose non-public, personally identifiable information about you to our service providers without your consent to perform the services on SmartyPig.com. We restrict access to non-public personal information about you to those employees on a “need to know” basis only. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information. We may provide aggregated data about the usage of our services to third parties for such purposes as we deem, in our sole discretion, to be appropriate. We may segment our users by savings category (i.e. electronics, home improvement). However, no non-public personal information about you will be included in this aggregate data.

Service Providers

We use other third-party service providers such as our banking, identity verification and retail gift card providers to provide services on our site. When you register on SmartyPig for an account, setup savings goals and redeem your funds, we will share personally identifiable information as necessary for the third-party to provide that service. These third parties are prohibited from using your personally identifiable information for any other purpose including their own marketing purposes.

Security

The security of your personal information is important to us. When you enter sensitive information (such as your social security number) during registration, we encrypt that information using secure socket layer technology (SSL). We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

If you have any questions about security on our Web site, you can email us at support@smartypig.com.

Communications Between Users

SmartyPig allows registered users to send automated e-mail notifications to their family members and friends. Automated e-mails you send to a family member or a friend will come from support@smartypig.com.

The e-mail will include the following statement:

“The following e-mail was sent to you on behalf of John Doe at <johndoe@example.com>”

Choice/Opt-out

SmartyPig users may choose to opt-in to receiving marketing information from selected partners, such as our banking service provider, West Bank. This can be done during the registration process. Registered users may also opt-in to receiving this information at anytime under the EDIT MY PROFILE. Visit the West Bank privacy policy at <http://www.westbankiowa.com/security/privacy> for additional information.

You may not opt-out of receiving service related emails from SmartyPig that relate to the general usage of smartypig.com.

You will be notified when your personal information is collected by any third-party that is not our agent/service provider, so you can make an informed choice as to whether or not to share your information with that party.

Legal Disclaimer

It is possible that we may need to disclose personal information about you when required by law. We will disclose such information wherein we have a good-faith belief that it is necessary to comply with a court order, ongoing judicial proceeding, or other legal process served on our company or to exercise our legal rights or defend against legal claims.

Accessing and Changing Your Account Information

You can review the personal information you provided us and make any desired changes to the information, or to the settings for your SmartyPig account, at any time by logging into your account on the SmartyPig Website and editing the information on your Profile page. When you close your SmartyPig account, we will remove your name and other personally identifiable information from our publicly viewable data. We may retain certain data contributed by you if it may be necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained data will continue to be subject to the terms of the SmartyPig Privacy Policy to which you have previously agreed.

Links to Other Sites

This Web site contains links to other sites that are not owned or controlled by SmartyPig. Please be aware that we, SmartyPig, are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each and every Web site that collects personally identifiable information. This privacy statement applies only to information collected by this Web site

Changes To This Privacy Policy

SmartyPig may update this privacy policy. In the event there are material changes in the way we collect and use your personally identifiable information, we will notify you here, via e-mail or by means of a notice on our home page. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

If you have any questions regarding our privacy policy, please contact SmartyPig Customer Support at 888-567-6278 or e-mail privacy@smartypig.com.

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