



PRIVACY POLICY | Last Updated: July 2019

Valor Intelligent Processing LLC., (“Valor Intelligent Processing”, “us”, “we”, or “our”) operates the <https://www.valorvip.com>. This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our site and the choices you have associated with that data. We use your data to provide and improve the site. By using the site, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://www.valorvip.com/privacy-policy>

Definitions:

- **Site** is the <https://www.valorvip.com>/ website
- **Personal Data** means data about an individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- **Usage Data** is data collected automatically either generated by the use of the site or from the site infrastructure itself (for example, the duration of a page visit).
- **Cookies** are small pieces of data stored on your device (computer or mobile device).
- **Data Controller** means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.
- **Data Processors** (or Service Providers) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
- **Data Subject (or User)** is any living individual who is using our site and is the subject of Personal Data.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our site to you.

Types of Data Collected

Personal Data

While using our site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally, identifiable information may include, but is not limited to:

- Email address

- Current and former names
- Phone Number
- Address, State, Province, ZIP/Postal code, City
- Social Security Number
- Date of birth
- Cookies and Usage Data

This information is collected so that Valor Intelligent Processing can communicate with you regarding your account, and sometimes to verify that you are the proper party to discuss the account with. If you are making a payment through our payment portal, Valor Intelligent Processing and/or a third-party vendor will collect the information necessary to process your payment exactly as you have authorized and not for any other purpose.

When you provide your personal information to Valor Intelligent Processing through our website or through our payment portal we use this information only for the purpose you are providing it, and the information is kept secure and is not disseminated for any other use except that which is required by law. Access to your information is limited only to appropriate employees of the company and in some instances to the originator of the account.

Usage Data

We may also collect information how the site is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our site that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our site and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our site.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our site. Examples of Cookies we use:

- **Session Cookies**— We use Session Cookies to operate our site.
- **Preference Cookies**— We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies**— We use Security Cookies for security purposes.

Use of Data

Valor Intelligent Processing uses the collected data for various purposes:

- To provide and maintain our site
- To notify you about changes to our site
- To allow you to participate in interactive features of our site when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our site
- To monitor the usage of our site
- To detect, prevent and address technical issues

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Valor Intelligent Processing legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Valor Intelligent Processing may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

Retention of Data

Valor Intelligent Processing will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Valor Intelligent Processing will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our site, or we are legally obligated to retain this data for longer time periods.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Valor Intelligent Processing will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal

Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Disclosure for Law Enforcement

Under certain circumstances, Valor Intelligent Processing may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Valor Intelligent Processing may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Valor Intelligent Processing
- To prevent or investigate possible wrongdoing in connection with the site
- To protect the personal safety of users of the site or the public
- To protect against legal liability

Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

“Do Not Track” Signals

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Valor Intelligent Processing aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data, we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Valor Intelligent Processing relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Credit Reporting Agencies

Your information, including Personal Data, may be sent to the national credit reporting agencies. If this occurs, all reporting of your information, including Personal Data, to the national credit reporting agencies will be done in accordance with all applicable credit reporting laws, including the Fair Credit Reporting Act.

Service Providers

We may employ third party companies and individuals to facilitate our site ("Service Providers"), to provide the site on our behalf, to perform site -related services or to assist us in analyzing how our site is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our site.

- **Google Analytics** Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our site. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the site available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Links to Other Sites

Our site may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Children's Privacy

Our site does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

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Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our site, prior to the change becoming effective and update the "Last Updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email: info@valorvip.com

By visiting this page on our website: <https://www.valorvip.com/contact/>