

This website is owned and operated by FICO. At FICO we are committed to providing you with financial products and services to meet your needs. Our commitment includes protecting personally identifiable information we obtain about you when you register to use one of our websites or become our customer ("Personal Information"). We want to earn your trust by providing strict safeguards to protect this information. This FICO Privacy Notice ("Notice") describes how we collect, use and disclose Personal Information. This Notice applies to customers, former customers, and applicants.

**NOTE:** If you are an individual and you register to use one of our Web sites, or become our customer by obtaining a product from us to be used primarily for personal, family or household purposes, please review the separate [FICO Privacy Policy](#) that applies to you and your transactions with FICO and our consumer division, myFICO.

### Collection of Personal Information

We collect information from applications, questionnaires, and other forms you submit to us, such as your name, your job title, your company's name and industry sector, your company's location (country, state and zip code), and your contact information (address, email, and telephone number). We collect information from your transactions and interactions with us, such as your professional interests. We may collect information from credit bureaus if it is necessary for the delivery of the services we provide you, and we may access public sources of information, such as census data and real estate records, and private sources of information such as market research data.

Collecting Personal Information is necessary for performance of the services and functionalities offered on the website. If you decline to provide the requested Personal Information, we may not be able to process your inquiry or other requests. This website is hosted by a third party service provider on servers located in the United States. If you are located in a non-US jurisdiction, you may be sending your Personal Information to the United States or another jurisdiction that does not have laws that provide an equivalent level of data protection to the laws in your home country.

### Use of Personal Information

We may use web-based tools when you visit our websites, such as "cookies" to track your online activities, including your registration, submissions, and information requests, in accordance with applicable law. Cookies are electronic files placed on your computer by a website server. The cookies track your online activities on this website, including the IP address from which you accessed the website, and may link that information with Personal Information you have provided us through online registration. We may also use your IP address to help diagnose problems with our server and to administer our website.

We use Personal Information to register you with the website and provide you with requested information or services. We may also from time to time use your contact information to send you information about FICO and marketing materials via telephone, automated email messages, and direct mail. These email messages may contain web beacons and other features that tell us you received and were able to open the message. At any time you may opt out of receiving further email communications from us by clicking the unsubscribe link in the footer of all FICO email messages. You may also opt out of receiving any marketing solicitation from us, including email, direct mail, and phone solicitations, by calling us at 1.888.FICO.EDM (1-888-342-6336) at any time Monday through Friday. This website contains links to other websites: FICO is not responsible for the privacy practices or the content of other websites.

Your web browser may be set to accept cookies automatically, but can be changed to decline them. The Help section of the toolbar on most browsers will tell you how to set your browser to prevent accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Please note that if you decline to accept cookies, then you may be required to re-register each time you download or request materials from the website.

### Disclosures of Personal Information

FICO may disclose Personal Information to third parties as required or permitted by law, under the following circumstances:

1. We may disclose Personal Information to companies in our corporate group as necessary or appropriate to provide the product or service you requested, to contact you in connection with product or service offerings, or for other legitimate business purposes.
2. We may disclose certain Personal Information to companies and individuals with whom we contract to perform business functions and services on our behalf. Such business functions may include hosting our web servers, analyzing data, providing legal, accounting and marketing services, and providing other support services.
3. We may disclose certain Personal Information to other companies and individuals to help us market our products, including business partners in joint marketing agreements (CA residents: we will not disclose information about you to other financial service providers in joint marketing agreements, other than as required by law, unless you authorize us to do so). We require all such parties to maintain the security and confidentiality of the Personal Information, and to process the data in accordance with our instructions.
4. We may disclose Personal Information to the extent necessary or appropriate to government agencies, advisors, and other third parties in order to comply with applicable laws, or if such action is necessary to protect the rights or property of FICO or its affiliated companies.
5. European Union citizens: you may opt out of our (1) disclosure of Personal Information to a third party or (2) use for a purpose other than the purpose for which it was originally collected or subsequently authorized by you. For Sensitive Personal Information, you must affirmatively or explicitly (opt out) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. "Sensitive Personal Information" means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health.

### Personal Data Security and Confidentiality

We have up-to-date physical safeguards, such as secure areas in buildings; electronic safeguards, such as passwords and encryption; and procedural safeguards, such as customer authentication procedures to prevent ID theft. We restrict access to information about you to only those employees who need to know that information to provide products or services to you. We carefully select and monitor outside service

providers, such as mail vendors, who have access to customer information, and we require them to keep it safe and secure. We do not allow them to use or share the information for any purpose other than the job they are hired to do. We train our employees on these security procedures, and we conduct regular audits to check on compliance with the procedures.

### **Personal Data Access and Correction**

FICO will provide you access to Personal Information about you so you can correct or delete the Personal Information in accordance with applicable law. You may have additional rights in non-U.S. countries, such as objecting to and blocking the processing of your Personal Information. For security reasons, FICO will take steps to authenticate your identity before providing you with access to Personal Information.

### **Compliance with the U.S. - EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework**

FICO complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. FICO has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. FICO is committed to handling such personal information in accordance with the Safe Harbor Principles:

- *Notice.* We will notify you about the purposes for which we collect and use information about you. We will provide information about how you can contact us with any inquiries or complaints, the types of third parties to which we disclose the information and the choices and means you have for limiting its use and disclosure.
- *Choice.* We will give you the opportunity to choose (opt out) whether your personal information will be disclosed to a third party or used for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by you. For sensitive information, we will get your affirmative (opt in) choice if the information is to be disclosed to a third party or used for a purpose other than its original purpose or the purpose authorized subsequently by you.
- *Onward Transfer (Transfers to Third Parties).* We will apply the notice and choice principles when we disclose information to a third party. If we transfer information to a third party that is acting as an agent, we will require that the third party agree to have adequate privacy protection as is required by the relevant principles.
- *Access.* You will have access to personal information about yourself that we hold, and you may correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the privacy risks in question, or where the rights of persons other than you would be violated.
- *Security.* We will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.
- *Data Integrity.* We will take precautions to assure the personal information is relevant for the purposes for which it is to be used. We will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

[We self-certify compliance with](#)



To learn more about the Safe Harbor program, and to view FICO's certification, please visit <http://www.export.gov/safeharbor>.

### Questions and Complaints

If you have a question about our privacy practices, or want to submit a complaint, contact us at:

<u>United States</u>	<u>European Union</u>
J.C. Nelson Internet Manager FICO 200 Smith Ranch Road San Rafael, CA 94903 USA Email Address: <a href="mailto:webmanager@fico.com">webmanager@fico.com</a>	Simon Elsom Senior Director, Legal FICO Cottons Centre 5th Floor Hays Lane London SE1 2 QP
<u>United Kingdom</u>	

EU Citizens: If we cannot satisfactorily address your inquiry, there is an independent organization that can review your complaint and provide the appropriate recourse for you. Your inquiry will be investigated and resolved by the Dispute Resolution Process of TRUSTe [[www.truste.org/](http://www.truste.org/)]. TRUSTe is authorized to (i) verify that the commitments FICO has made to adhere to the Safe Harbor principles have been implemented; (ii) determine whether FICO has remedied problems arising out of a failure to comply with the principles; and (iii) assess and enforce sanctions against FICO to ensure compliance.

### Revisions to the Notice. Effective Date.

If we change this Notice we will post the changes here and on the home page at [www.fico.com](http://www.fico.com) with 30 days notice before the revised Notice becomes effective.

This Notice is effective as of October 1, 2011.