Elite Financial Services Privacy Policy

Last updated: January 3, 2012

Elite Financial Services recognizes your expectations of privacy and security and we greatly respect your privacy concerns. This Privacy Policy describes how we gather information, what we do with the information we collect and what steps we take to safeguard your privacy and protect your personal information.

To ensure that this Privacy Policy is up-to-date and responsive to changes in our website(s), our business activities, relevant laws and regulations and developments in the applicable technology, we reserve the right to change and/or amend this Privacy Policy from time to time. Your use of our website(s) constitutes your consent to the current version of our Privacy Policy.

We may make changes to this Privacy Policy at any time and will inform you of changes, as required by law. To receive the most up to date Privacy Policy, you can visit our web site at: http://www.livedebtfree.net.

If you have questions or concerns regarding this statement or your rights under our Privacy Policy, you should first contact a member of our staff at staff@livedebtfree.net.

We have organized this Privacy Policy as a series of answers to questions that we have found to be of most interest to consumers. If you do not see the answer to any question you may have about what information we collect, how we collect information and what we do with the information we collect, please contact us at the following address:

By e-mail:
Staff@livedebtfree.net
In Writing:
Elite Financial Services, Inc.
999 Broadway, Suite 200
Saugus, MA 01906

What Does This Privacy Policy Cover?

This Privacy Policy covers what we do with any personal information you may submit or authorize us to obtain, as well as any other information that we may gather when you access any of our websites. This Privacy Policy also covers any of your personal and other information that any of our business partners may share with us.

This Privacy Policy applies to any website owned and/or operated by Elite Financial Services, Inc.

Please note that our policies and procedures apply only to websites owned and/or operated by us and not to websites maintained by other companies or to any website to which we may link or to unrelated businesses with which we may share information.

What is "Personal Information"?

Personal information is any information that you provide to us or authorize us to obtain that identifies you, personally, or that can be logically associated with you. Examples of personal information would be your name, your address, your e-mail address and your Social Security Number. Demographic information such as gender, age, zip code, etc., is generally not considered personal information.

Why Do You Need To Collect My Personal Information?

We collect and use personal information to respond more completely to your requests for products and services we offer and those of our business partners, as well to service your relationship with us and any account you may have with us. We also collect personal and other information to make you aware of products and/or services that are likely to be of interest to you.

What Personal and Other Information Do You Collect and/or Maintain?

We collect and maintain the information you provide to us, such as:

- Any information you provide to us on applications or forms when you request a product or service, such as your income and accounts with others. This information may include your name, your address, your telephone number and, in some cases, your Social Security number. Depending upon the product or service you request, you may also be asked to provide additional information, such as the amount of your current unsecured debt and the identity of your creditors, information about your mortgage and other financial and personal information.
- Information we receive about your transactions with us such as your account balance, payment history and credit card usage.
- Information, such as your e-mail address, that you provide to us when you register to receive communications from us or when you communicate with us through our customer service facility, or otherwise correspond with us.

We also collect other, non-personal information, which is broadly defined as any information that is not and cannot be directly associated with you. An example of this type of non-personal information would be your zip code.

How Do You Use The Personal and Other Information You Collect?

We use the personal information you supply to us to provide to you the service(s) or product(s) that you request, to service your account, and to keep you informed about services that may be of interest to you.

We occasionally receive medical or health information from a customer if, for example, a customer lists a medical debt with us. We do not share medical or health information, including information received from third parties, among our companies, except to maintain accounts, process transactions or service customer requests to the extent permitted by law.

With Whom Do You Share My Information?

By submitting your request you are consenting to being contacted by us, through any means, based on the information you provide to us, even if you have opted into the National Do Not Call List administered by the Federal Trade Commission, any state Do Not Call List or the Do Not Call List of any specific institution. If, after you are contacted by that product or service provider, you do not wish to be contacted by that person again you must make a specific request to the product or service provider, not to Freedom Financial Network.

As permitted by law, we may also share your personal and other information with a third party that provides a service or supplies a specific functionality to us, such as a call center operator. These service providers will be provided only with the information necessary for them to perform their functions and are not allowed to share any of the provided information with others for any purpose whatsoever.

Additionally, we may share your personal and other information with creditors for the purpose of resolving your debts. Any person with whom we share your personal information is also required to comply with federal and state privacy regulations and will have its own privacy policies that should be made available to you at the time you are first contacted.

Are There Any Other Circumstances Where You Disclose My Information?

We may be required to share your information with law enforcement or government agencies in response to subpoenas, court orders or other forms of legal process. We may elect to share information when, in our reasonable judgment, such sharing is necessary or appropriate for the investigation or prevention of illegal activities, including actual or suspected fraud, real or potential threats to the physical safety of any person or otherwise as required by law.

How Do You Collect Information Online?

We collect certain types of non-personal information and technical data from each visitor to our website(s). For example, when you click on a banner advertisement or text link that is associated with one of our websites, the banner or text placement, along with the time of your visit, your Internet Protocol address and other path-related information, is sent to us. Similarly, the page requests you make when you visit our website(s) are stored and used by us. We use this information, none of which is or can be personally associated with you, for statistical and analytic purposes, to help us understand which page views are most appealing to our customers and to help us improve the likelihood that we will be able to offer you only products or services in which you have a genuine interest.

How Do You Safeguard The Information You Collect?

The security of your personal information is a very high priority for us and we take a number of steps to safeguard it. Some of the measures we take are:

- Limiting access to personal information to those employees who are critical to the delivery of products and services to you.
- Implementing appropriate physical, electronic and procedural safeguards to guard against unauthorized access or use.
- Requiring appropriate consents and protections from our business partners before we share any personally identifiable information.

Elite Financial Services uses commercially reasonable physical and technical security measures to protect all personal information in our possession. Sensitive information such as Social Security numbers are encrypted using secure sockets layer encryption from the time of your submission and while it is stored by us. We cannot, however, guarantee or warrant the absolute security of any system or that any information we hold will not be accessed, disclosed, altered or destroyed.

How Long Do You Retain My Personal Information?

We normally retain your personal information for a reasonable time after our customer relationship with you ends, and in any event, generally not less than one (1) year from the date we first collect it. For legal reasons, we may sometimes be required to retain personal information for a longer period. Under certain circumstances, Federal and/or state law may require us to retain your personal information for different periods of time.

Non-personal information may be retained indefinitely.

Can I Correct or Remove My Personal Information?

If you believe there are factual errors in any of the information you have submitted to us, please contact us and advise us of the error. To protect your privacy and security we may require that you verify your identity before we make any requested changes to personal information. Please contact us at staff@livedebtfree.net.

What Choices Do I Have?

You can always elect not to provide personal information to us, although if you do not complete and submit the information we ask for we may not be able to provide you with the most complete responses or you may not be able to access all the available features.

Choices You May Make for Your Privacy

You may choose to limit the way we share information about you. You may also choose to limit the solicitations we send you. These choices are referred to as "opt-outs."

I. Sharing of Information Outside of Elite Financial Services

If you do not want us to disclose nonpublic personal information about you, you may choose to opt out of those disclosures. In other words, you may tell us not to share this information and we will not, except in those cases where we may be required or permitted by law. For example, required disclosures may be made to law enforcement and regulators, while permitted disclosures may be made to vendors assisting us in opening, maintaining or servicing your account. (CA and VT Residents: To the extent state law applies, we will not disclose information about you outside the Freedom Financial family of companies, except as required or permitted by law.)

II. How to Opt-Out

Your opt-out choices will continue to apply until you tell us to change them, except with respect to limits on solicitations which we will honor for the time periods required by law. If you have previously opted out based on an Elite Financial Services notice and would like to keep the same preferences you do not need to opt out again.

Joint/Multiple Accounts: Your opt-out choices will apply to all of your consumer accounts with Elite Financial Services, including joint accounts. For a joint account, an opt-out choice made by one joint account holder will only apply to that account holder.

Applicants: Unless otherwise notified, applicants who do not become our customers may not make certain privacy elections.
To exercise one or more of your opt-out choices described:

Call us toll free: (866) 922-0040

To opt out of e-mail solicitations send your request to staff@livedebtfree.net.

NV Residents: Pursuant to state law, if you would like more information about telemarketing solicitations please contact us at (866) 922-0040 or write to us at Elite Financial Services, 999 Broadway, Suite 200, Saugus, MA 01906 or visit our Web site at www.livedebtfree.net. If you would like more information about Nevada's law regarding corporate do-not-call registries, please contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Street, Suite 3900, Las Vegas, Nevada 89101. Telephone Number: 1-702-486-3132. E-mail: BCPINFO@ag.state.nv.us

Do You Use My Personal Information to Contact Me Without Permission?

This Privacy Policy constitutes the Elite Financial Services Do Not Call Policy under the Telephone Consumer Protection Act for all consumers and is pursuant to state law. When you talk with us by telephone your conversation may be monitored or recorded by us. We maintain an internal Do Not Call preference list. Do Not Call requests will be honored within 30 days and will be effective for at least five years from the date of the request. No telemarketing calls will be made to residential or cellular phone numbers that appear on the Do Not Call list.

Elite Financial Services has a strict "anti-spam" policy for itself and its business partners and vendors. You will not receive Elite Financial Services e-mails unless you submit your e-mail address to us or register on one of our websites to receive communications.

You may tell us not to solicit you at your postal mailing address, telephone number or e-mail address. If you elect not to receive marketing offers by postal mail, telephone and/or e-mail, please note that we may continue to contact you as necessary to service your account and for other non-marketing purposes. We may also continue to provide marketing information in your regular account mailings and statements, including online and electronic communications.

Social Security Numbers

Often we do not collect your Social Security number but if we do our Privacy Policy (1) protects the confidentiality of Social Security numbers, (2) prohibits unlawful disclosure of Social Security numbers, and (3) limits access to Social Security numbers.

Testimonials

If you submit a testimonial to us, we will ask for your permission to post your testimonial prior to any public use. We may post your name as given to us in your testimonial. We may post a photo of you or use a stock photo. Please be aware that any personally identifiable information you submit as a testimonial to be posted can be read, collected, or used by the general public, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to include in any testimonial you choose to submit. If at any time you decide to remove your testimonial, please contact us via e-mail or postal mail.

A Special Note about Children's Privacy

We do not knowingly collect, use or share personal information about visitors under 18 years of age. If you are under 18 years of age, you can use the products and/or services offered on our website(s) only in conjunction with your parents or guardians.

Special Notification for California Residents

California residents who provide us with their personal information may request certain information regarding disclosures made to third parties for direct marketing purposes, including the names and address of those to whom such disclosures have been made. Such requests must be submitted to us at the following mailing address: California Privacy Request, Elite Financial Services, 999 Broadway, Suite 200, Saugus, MA 01906. This request may be made no more than once per calendar year.