

VIP Place's Privacy Policy

VIP Place's Privacy Policy is designed to help you understand how we collect and use the personal information you decide to share, and help you make informed decisions when using VIP Place, located at www.brokerdealerplace.com.

By using or accessing VIP Place, you are accepting the practices described in this Privacy Policy.

The Information We Collect

When you visit VIP Place you provide us with two types of information: personal information you knowingly choose to disclose that is collected by us and Web site use information collected by us as you interact with our Web site.

When you register with VIP Place, you provide us with certain personal information, such as your name, email address, telephone number, CRD number, address, gender, and any other personal or preference information that you provide to us.

When you enter VIP Place, we collect your browser type and IP address. This information is gathered for all VIP Place visitors. In addition, we store certain information from your browser using "cookies." A cookie is a piece of data stored on the User's computer tied to information about the User. We use session ID cookies to confirm that Users are logged in. These cookies terminate once the user closes the browser. By default, we use a persistent cookie that stores your login ID (but not your password) to make it easier for you to login when you come back to VIP Place. You can remove or block this cookie using the settings in your browser if you want to disable this convenience feature.

When you use VIP Place, you may set up your personal profile, form relationships, send messages, perform searches and queries, form groups, place and/or answer job opportunities, set up events, and transmit information through various channels. We collect this information so that we can provide you the service and offer personalized features. In most cases, we retain it so that, for instance, you can return to view prior messages you have sent or easily see your friend list. When you update information, we usually keep a backup copy of the prior version for a reasonable period of time to enable reversion to the prior version of that information.

You post User Content (as defined in the VIP Place [Terms of Use](#)) on the site at your own risk. Although we allow you to set privacy options that limit access to your pages, please be aware that no security measures are perfect or impenetrable. We cannot control the actions of other Users with whom you may choose to share your pages and information. VIP Place is an exclusive financial industry social network, however, we cannot, and do not, guarantee that the User Content you post on the site will not be viewed by unauthorized persons. We are not responsible for circumvention of any

privacy settings or security measures contained on the site. You understand and acknowledge that, even after removal, copies of User Content may remain viewable in cached and archived pages, or if other Users have copied or stored your User Content.

Any improper collection or misuse of information provided on VIP Place is a violation of the VIP Place Terms of Use, and should be reported to us. If you choose to use our invitation service to tell a friend about our site, we will ask you for information needed to send the invitation, such as your friend's email address. We will send your friend an email, in your name, inviting him or her to visit the site. VIP Place stores this information to send invitations and reminders, to register a friend connection if your invitation is accepted, to allow you to see invitations you have sent, and to track the success of our referral program. Your friend may contact us through the Contact Us to request that we remove this information from our database.

VIP Place may also collect information about you from other sources, such as newspapers, blogs, instant messaging services, and other Users of the VIP Place service in order to provide you with more useful information, and a more personalized experience.

Use of Information Obtained by VIP Place

When you register with VIP Place, you create your own profile and privacy settings. Your profile information, as well as your name, email and photo, are displayed to people in the networks specified in your privacy settings to enable you to connect with people on VIP Place. We may occasionally use your name and email address to send you notifications regarding new services offered by VIP Place, Broker Dealer Place, Inc., or other parties, that we think you may find valuable.

Profile information is used by VIP Place primarily to be presented back to, and edited by you, when you access the service and to be presented to others permitted to view that information by your privacy settings. In some cases where your privacy settings permit it, other VIP Place users may be able to supplement your profile.

Profile information you submit to VIP Place will be available to Users of VIP Place that you allow to access the information through your privacy settings. Your name, network names, and profile picture thumbnail will be available in search results across the VIP Place network. This is primarily so your friends can find you and send a friend request. People who see your name in searches, however, will not be able to access your profile information unless they have a relationship to you that allows such access based on your privacy settings.

VIP Place may send you service-related announcements from time-to-time through the general operation of the service. For instance, if a friend sends you a new message, or someone posts on your wall, you may receive an email alerting you to that fact.

VIP Place may use information in your profile without identifying you as an individual to third parties. We believe this benefits you. We may use information about you that we collect from other sources, including, but not limited to newspapers and Internet sources such as blogs, instant messaging services, VIP Place affiliates and other users of VIP Place to supplement your profile. Where such information is used, we generally allow you to specify in your privacy settings that you do not want this to be done or to take other actions that limit the connection of this information to your profile.

Sharing Your Information with Third Parties

VIP Place is about sharing information with others — friends and people in your networks — while providing you with privacy settings that restrict other users from accessing your information. We allow you to choose the information you provide to friends and networks through VIP Place. Our network architecture and your privacy settings allow you to make informed choices about who has access to your information. We may provide contact information to third party marketers without your permission. We may share your information with third parties where we believe such sharing is 1) reasonably necessary to offer a product, or service, 2) legally required or, 3) permitted by you. For example:

- We may provide information to service providers to help us bring you the services we offer. Specifically, we may use third parties to facilitate our business, such as to host the service at a co-location facility for servers, to send out email updates about VIP Place, to remove repetitive information from our user lists, to process payments for products or services, to offer an online job application process, or to provide search results or links (including sponsored links). In connection with these offerings and business operations, our service providers may have access to your personal information for use for a limited time in connection with these business activities. Where we utilize third parties for the processing of any personal information, we implement reasonable contractual and technical protections limiting the use of that information to the VIP Place specified purposes.
- We may occasionally provide demonstration accounts that allow non-users a glimpse into the VIP Place world. Such accounts have only limited capabilities (e.g., messaging is disabled) and passwords are changed regularly to limit possible misuse.
- We may be required to disclose user information pursuant to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. We do not reveal information until we have a good faith belief that an information request by law enforcement or private litigants meets applicable legal standards. Additionally, we may share account or other information when we believe it is necessary to comply with law, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the VIP Place service or using the VIP Place name, or to prevent imminent bodily harm. This may include sharing information with other companies, lawyers, agents or government agencies.

- We let you choose to share information with marketers or electronic commerce providers through on-site offers.
- If the ownership of all, or substantially all, of the VIP Place business, or individual business units owned by Broker Dealer Place, Inc., were to change, your User information may be transferred to the new owner so the service can continue operations. In any such transfer of information, your User information would remain subject to the promises made in any pre-existing Privacy Policy.

When you use VIP Place, certain information you post or share with third parties (e.g., a friend or someone in your network), such as personal information, comments, messages, or other information, may be shared with other Users in accordance with the privacy settings you select. All such sharing of information is done at your own risk.

Links

VIP Place may contain links to other Web sites. We are, of course, not responsible for the privacy practices of other Web sites. We encourage our Users to be aware when they leave our site to read the privacy statements of each and every web site that collects personally identifiable information. This Privacy Policy applies solely to information collected by VIP Place.

Changing or Removing Information

Access and control over most personal information on VIP Place is readily available through the profile editing tools. VIP Place Users may modify or delete any of their profile information at any time by logging into their account. Information will be updated immediately. Individuals who wish to deactivate their VIP Place account may do so on the site. Removed information may persist in backup copies for a reasonable period of time, but will not be generally available to members of VIP Place.

Where you make use of the communication features of the service to share information with other individuals on VIP Place, however, (e.g., sending a personal message to another VIP Place User) you generally cannot remove such communications.

Security

VIP Place takes appropriate precautions to protect our Users' information. Your account information is located on a secured server behind a firewall. When you enter sensitive information, we encrypt that information using secure socket layer technology (SSL). (To learn more about SSL, go to http://en.wikipedia.org/wiki/Secure_Sockets_Layer). Because email and instant messaging are not recognized as secure communications, we request that you not send private information to us by email or instant messaging services. If you have any questions about the security of VIP Place Site, please contact us through the Contact Us.

Terms of Use, Notices and Revisions

Your use of VIP Place, and any disputes arising from it, is subject to this Privacy Policy as well as our Terms of Use and all of its dispute resolution provisions including arbitration, limitation on damages and choice of law. We reserve the right to change our Privacy Policy and our Terms of Use at any time. Non-material changes and clarifications will take effect immediately, and material changes will take effect within 30 days of their posting on this site. If we make changes, we will post them and will indicate at the top of this page the policy's new effective date. If we make material changes to this policy, we will notify you here, by email, or through notice on our home page. We encourage you to refer to this policy on an ongoing basis so that you understand our current privacy policy. Unless stated otherwise, our current privacy policy applies to all information that we have about you and your account.

Contacting the Web site

If you have any questions about this privacy policy, please visit our [Contact Us](#).