

Effective Date: January 1, 2020

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Avenue 365 Lender Services, LLC (“we” or “Company”) respects your privacy and is committed to providing a transparent notice of our Privacy Notice and Disclosure for California Residents. This Privacy Notice and Disclosure for California Residents applies solely to those who reside in the State of California (“consumers” or “you”).

The purpose of this privacy notice and disclosure is to inform California residents, at or before the time of collection of personal information and to inform you as part of our privacy policies:

- Your “Right to Know” about personal information collected, used, and disclosed including:
 - What categories of personal information we collect from you and the purpose for its collection,
 - How we use those categories of personal information, and
 - How we share the personal information you entrust to us,
- Transparency about personal information that we sell [*or our commitment not to sell your data now or in the future*], [and your right to opt-out of the sale of your personal information].
- Your “Right to Delete” personal information.
- How to submit a verified consumer request for your Right to Know or Right to Delete.
- How to use an authorized agent to submit a verified consumer request.
- Your “Right to Non-Discrimination” for the exercise of a privacy right.
- Changes to our privacy notice.
- Our contact information.

Privacy Notice and Disclosure for California Residents

Your Right to Know

You have the right to request that the Company disclose what personal information it collects, uses, discloses, and sells. You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

We collect personal information, which means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). The following table includes disclosures of the personal information we collect from consumers and the purposes for which it is collected and used, as well as lists of categories of consumers’ personal information we

have collected about consumers in the past 12 months, the categories of sources from which it was collected and categories of third parties with whom we share the personal information.

What personal information do we collect, use and share?		
We Collect/Use	<input checked="" type="checkbox"/>	A. Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>	
This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:
<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • For our internal operation purposes • For auditing relating to consumer transactions including ad impressions and compliance with regulations • Fraud and security detection • Debugging to identify and repair errors • Short-term data use for the current interaction that is not used to build a profile • Servicing transactions and accounts (e.g., customer service, maintaining and servicing accounts, customer verification, payment processing) and providing services on behalf of business or service provider (e.g., financing, advertising or marketing, analytics) • To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred. • Undertaking internal research for technological development and demonstration 	<ul style="list-style-type: none"> • Information from you that you actively provide: We collect this information from sources including from online forms, e-mail, and via telephone. • Information from you that you provide passively from your use of your sites and services: We collect this information from sources including from a web browser, e-mail, app, or smartphone. • Third Parties (information we collect about you from third party sources): We collect this from sources including our affiliates, and those entities that request title insurance, settlement services, default services and whole loan solutions 	<ul style="list-style-type: none"> • Cloud storage providers • Payment processors • Web analytics providers • Web hosting service providers • E-mail distribution service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers • Customer relationship management tool providers • Business partners and service providers used throughout the loan origination process and the servicing of your loan that request title insurance, settlement services, and solutions for default services and whole loan solutions. • Federal and state governmental agencies as part of the title process or their supervision of the Company.

<ul style="list-style-type: none"> • To share the personal information with service providers to carry out other business purposes. • To provide you with information, products or services that you request from us. • To comply with all applicable legal requirements. • To provide to federal and state agencies as part of the loan process or their supervision of the Company. • To carry out our obligations and enforce our rights arising from any contracts entered between you and us. • To protect the rights, property or safety of us, our clients or others. • To respond to law enforcement requests and as required by applicable law, court order or governmental regulations. 		
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<p>We Collect/Use</p>	<input checked="" type="checkbox"/>	<p>B. Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, social security number, address, telephone number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.</p>
<p>We Have Collected/Used in the Past 12 Months</p>	<input checked="" type="checkbox"/>	

<p>This category of personal information is collected and used for the following purposes:</p>	<p>What are the categories of sources from which the personal information was collected?</p>	<p>This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:</p>
<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • For our internal operation purposes • For auditing relating to consumer transactions including ad impressions and compliance with regulations • Fraud and security detection • Debugging to identify and repair errors • Short-term data use for the current interaction that is not used to build a profile 	<ul style="list-style-type: none"> • Information from you that you actively provide: We collect this information from sources including from online forms, e-mail, and via telephone. • Information from you that you provide passively from your use of your sites and services: We collect this 	<ul style="list-style-type: none"> • Cloud storage providers • Payment processors • Web analytics providers • Web hosting service providers • E-mail distribution service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers

<ul style="list-style-type: none"> • To complete the requested service, such as title insurance or settlement services. • To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred. • Undertaking internal research for technological development and demonstration • To share the personal information with service providers to carry out other business purposes. • To provide you with information, products or services that you request from us. • To comply with all applicable legal requirements. • To provide to federal and state agencies as part of the loan process or their supervision of the Company. • To carry out our obligations and enforce our rights arising from any contracts entered between you and us. • To protect the rights, property or safety of us, our clients or others. • To respond to law enforcement requests and as required by applicable law, court order or governmental regulations. 	<p>information from sources including from a web browser, e-mail, app, or smartphone.</p> <ul style="list-style-type: none"> • Third Parties (information we collect about you from third party sources): We collect this from sources including our affiliates, and those entities that request title insurance, settlement services, default services and whole loan solutions 	<ul style="list-style-type: none"> • Customer relationship management tool providers • Business partners and service providers used throughout the loan origination process and the servicing of your loan that request title insurance, settlement services, and solutions for default services and whole loan solutions. • Federal and state agencies as part of the loan process or their supervision of the Company
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<p>We Collect/Use</p>	<input checked="" type="checkbox"/>	<p>C. Characteristics of CA or Federal Protected Classifications: For example, race, national origin), ethnicity, sex, age, gender, familial status, disability, or veteran status.</p>
<p>We Have Collected/Used in the Past 12 Months</p>	<input checked="" type="checkbox"/>	
<p>This category of personal information is collected and used for the following purposes:</p>	<p>What are the categories of sources from which the personal information was collected?</p>	<p>This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:</p>

<ul style="list-style-type: none"> • Characteristics like sex, age, gender, familial status maybe be collected to use to identify the proper parties in a judgment or similar search. 	<ul style="list-style-type: none"> • Information from you that you actively provide: We collect this information from sources including from online forms, e-mail, letters, face-to-face, and via telephone. • Third Parties (information we collect about you from third party sources): We collect this from sources including our affiliates, and those entities that request title insurance, settlement services, default services and whole loan solutions. 	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers • Customer relationship management tool providers • Business partners and service providers used throughout the loan origination process and the servicing of your loan that request title insurance, settlement services, and solutions for default services and whole loan solutions. • Federal or state governmental agencies as part of the title process or their supervision of the Company.
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We Collect/Use	<input type="checkbox"/>	D. Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
We Have Collected/Used in the Past 12 Months	<input type="checkbox"/>	

This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:

We Collect/Use	<input type="checkbox"/>	E. Biometric Information: For example, physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.
We Have Collected/Used in the Past 12 Months	<input type="checkbox"/>	

This category of personal information is collected and used for the following purposes:	What are the categories of sources from which	This category of personal information has been disclosed in the preceding 12
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		the personal information was collected?	months to the following third parties for a business purpose:
We Collect/Use	<input checked="" type="checkbox"/>	F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>		
This category of personal information is collected and used for the following purposes:		What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:
<ul style="list-style-type: none"> We may place cookies or similar files on your hard drive for security purposes, to facilitate site navigation, and to personalize your experience while visiting our websites. We may also use cookies to track responses to advertisements and to track your use of other websites. 		<ul style="list-style-type: none"> Information from you that you provide passively from your use of your sites and services: We collect this information from sources including from a web browser, e-mail, app, or smartphone. 	<ul style="list-style-type: none"> Web analytics providers Web hosting service providers Cloud storage providers Help Desk service providers Cybersecurity service providers Logistics and planning tool providers Customer relationship management tool providers
We Collect/Use	<input type="checkbox"/>	G. Geolocation Data: For example, information that can be used to determine a device's physical location.	
We Have Collected/Used in the Past 12 Months	<input type="checkbox"/>		
This category of personal information is collected and used for the following purposes:		What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:
We Collect/Use	<input checked="" type="checkbox"/>	H. Sensory or Surveillance Data: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household.	
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>		
This category of personal information is collected and used for the following purposes:		What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:

<ul style="list-style-type: none"> • Voice recordings for quality control and training purposes 	<ul style="list-style-type: none"> • Information from you that you actively provide: We collect this information from telephone calls. 	<ul style="list-style-type: none"> • Cloud storage providers • Web hosting service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Customer relationship management tool providers • Federal and state agencies as part of the title process or their supervision of the Company
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We Collect/Use	<input checked="" type="checkbox"/>	I. Professional or Employment-Related Information: For example, compensation, current and past job history and verification of current and past employment.
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>	

This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:
<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • For our internal operation purposes • For auditing relating to consumer transactions including ad impressions and compliance with regulations • Fraud and security detection • To share the personal information with service providers to carry out other business purposes. • To provide you with information, products or services that you request from us. 	<ul style="list-style-type: none"> • Information from you that you actively provide: We collect this information from sources including from online forms, e-mail, letters, face-to-face, and via telephone. • Third Parties (information we collect about you from third party sources): We collect this from sources including our affiliates, and those entities that request title insurance, settlement services, default services and whole loan solutions. 	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers • Customer relationship management tool providers • Business partners and service providers used throughout the loan origination process and the servicing of your loan that request title insurance, settlement services, and solutions for default services and whole loan solutions. <p>Federal or state governmental agencies as part of the title process or their supervision of the Company.</p>

We Collect/Use	<input type="checkbox"/>	J. Education Information (defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights
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We Have Collected/Used in the Past 12 Months	<input type="checkbox"/>	<i>and Privacy Act</i> (20 U.S.C. section 1232g, 34 C.F.R. Part 99)): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual's identity in relation to an educational institution either directly or indirectly through linkages with other information.
This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:
We Collect/Use	<input type="checkbox"/>	K. Profile Data: For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
We Have Collected/Used in the Past 12 Months	<input type="checkbox"/>	
This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:

Please note that Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act of 1994.

We will not collect additional categories of personal information or use the personal information for any other undisclosed purpose without providing you notice.

What we Sell and Right to Opt-Out

We do not sell the personal information of minors under 16 years of age without affirmative authorization. We sell and have sold personal information to third parties in the preceding 12 months as disclosed in the table below. As a California resident, you have the right to direct the Company to stop selling your personal information, and to refrain from doing so in the future, which is called the "Right to Opt-Out."

You may exercise your Right to Opt-Out by clicking “Do Not Sell My Personal Information” to use the webform <https://privacyportal-cdn.onetrust.com/dsarwebform/df235747-59bf-4ec6-950d-51e11eb73a43/651e6d8a-4e6b-4247-b365-7585b735cb91.html> or by submitting a request by calling 866-317-2347.

Authorized Agent for Opt-Out: If you use an authorized agent to exercise your right to opt-out of the sale of personal information, please note that we require that the authorized agent submit proof in the form of a written authorization from you that they have been authorized to act on your behalf.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by:

<https://privacyportal-cdn.onetrust.com/dsarwebform/df235747-59bf-4ec6-950d-51e11eb73a43/651e6d8a-4e6b-4247-b365-7585b735cb91.html>

Please review the Privacy Notice and Disclosure for California Residents [[link](#)] for additional details.

We have sold.	What personal information has the Company sold to third parties over the last 12 months?	Categories of third parties to whom this category of personal information has been sold
<input type="checkbox"/>	A. Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	
<input type="checkbox"/>	B. Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	
<input type="checkbox"/>	C. Characteristics of CA or Federal Protected Classifications: For example, race, national origin), age, gender, familial status, disability, or veteran status.	
<input type="checkbox"/>	D. Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	

<input type="checkbox"/>	<p>E. Biometric Information: For example, physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information</p>	
<input type="checkbox"/>	<p>F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement</p>	
<input type="checkbox"/>	<p>G. Geolocation Data: For example, information that can be used to determine a device’s physical location</p>	
<input type="checkbox"/>	<p>H. Sensory or Surveillance Data: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household</p>	
<input type="checkbox"/>	<p>I. Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.</p>	
<input type="checkbox"/>	<p>J. Education Information (<i>defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)</i>): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual’s identity in relation to an educational institution either directly or indirectly through linkages with other information.</p>	
<input type="checkbox"/>	<p>K. Profile Data: For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	

Your Right to Request Deletion of Your Personal Information

You have the right to request that the COMPANY delete any of your personal information collected or maintained by the Company, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information or for deletion. The request to know can be for any or all of the following about you:

- (1) Specific pieces of personal information that the Company has;
- (2) Categories of personal information the Company has collected;
- (3) Categories of sources from which the personal information is collected;
- (4) Categories of personal information that the Company sold or disclosed for a business purpose;
- (5) Categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- (6) The business or commercial purpose for collecting or selling personal information.

The request to delete is to delete any of your personal information collected or maintained by the Company, subject to certain exceptions.

You may only make a verifiable consumer request to know information twice within a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. We

will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

If you can submit requests using the following webform <https://privacyportal-cdn.onetrust.com/dsarwebform/df235747-59bf-4ec6-950d-51e11eb73a43/651e6d8a-4e6b-4247-b365-7585b735cb91.html> or by calling 866-317-2347. Your request will be verified using information you provide as described on the webform. If you call 866-317-2347 you will be asked to provide the same information requested on the webform for verification purposes.

Once we receive your verifiable consumer request, we will send you an acknowledgement letter within 10 days which will describe our verification process. We will respond to your request within 45 days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Please note we are unable to disclose or provide you with your Social Security Number, Driver's License Number, or other government issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers.

Using an Authorized Agent to Submit a Request

Only you, a person registered with the California Secretary of State, or a person you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to verify your identity directly by submitting a verified consumer request according to the procedures in the section "Submitting a Verified Consumer Request." If anyone purporting to be an authorized agent for a consumer contacts us, we will require proof that the authorized agent has been authorized to act on the consumer's behalf.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Changes to Our Privacy Notice

The Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

Contact for More Information

If you have any questions or comments about this notice, the ways in which the Company collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 877-365-AVEN

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