

PRIVACY POLICY

Please Read Carefully:

This is the privacy policy ("Privacy Policy"), effective as of March 1, 2007, for the Web site available at <http://www.smdavidsonappraisal.com> (the "Site") made available by *S.M. Davidson & Associates*, the legal owner of the Site ("*S.M. Davidson & Associates*", "we", "us" or "our"). This Privacy Policy sets forth our policies regarding the collection, use and disclosure of certain information relating to your use of the Site. Your use of this Site signifies your understanding and acceptance of the terms of this Privacy Policy. Our Privacy Policy is incorporated into, and part of, the Terms and Conditions of our web site and can be found at <http://www.smdavidsonappraisal.com/privacypolicy.htm> which governs your use of the Site in general.

We recognize the importance of protecting your privacy and our Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the personal information you provide to us, and to assist you in making informed decisions when using the Site. This Privacy Policy will be continuously assessed against new technologies, business practices and our clients' needs. As we update and diversify our products and services, this Privacy Policy may evolve. Please check this page for updates periodically. We will try to post any changes to this Privacy Policy before they become effective. If we make any material changes to this Privacy Policy, we will notify you here, by email or by means of a notice on our Site's home page.

If you have questions or concerns regarding this Privacy Policy or wish to exclude your personal information from our direct marketing purposes, please feel free to contact us at Smdson@aol.com or by writing to us at Director of Web Marketing, *S.M. Davidson & Associates*, 18034 Ventura Boulevard, #260, Encino, CA 91316.

Please note: by using or registering with our Site or by providing personal information, you agree to the terms of this Privacy Policy.

The types of information we collect

We have several areas where you can submit information to us, and we also have features that automatically collect information from the users of our Site. References to "personal and account information" contained in this Privacy Policy means your name, company name, account number, address, telephone number, e-mail address, and any other information that personally identifies you or would permit us to contact you.

Information voluntarily provided by you

REGISTRATION: When you visit or transact business on our Web site, you may be required to register with us or be requested to provide us with personal and account information. When you provide us with this information, we will let you know how we may use such information. If you tell us that you do not want us to use this information as a basis for further contact with you, we will respect your wishes. During the registration process, you must provide us with a member name and password, your name, address and phone number and a valid email address. It is your responsibility to keep your password strictly confidential. Communications from us; newsletters and promotional offers: In order to keep our users informed about our latest news, products and services, we may send e-mails and announcements to your personal email address that you provided to us while registering on our Site.

CONTACTING US: You are always free to contact us with any questions and/or problems related to your use of this Site. Our standard business practice is to retain any communications from our Site visitors to help us to serve each of you better.

Third-party information

LINKS: When using our Site, you may click through certain links that directly access real estate appraisal-related information provided by other resources. We are not, however, responsible for any other Web site, or their respective privacy policy or how they treat information about their users. We strongly advise you to review their privacy policies to find out how they are treating your personal information.

THIRD PARTY USAGE: You may also separately share your information with other Web sites or entities, such as those that create professional marketing lists, to receive special offers and promotions from their affiliates. These Web sites or entities may agree to share your information with us. Whether or not any third party actually shares your information with us and to what extent they do share your information with us will depend on their agreement with us and their respective privacy policies. *S.M. Davidson & Associates* is not responsible for, and will assume no liability if a partner or other Web site or entity collects, uses or shares, any information about you in violation of its own privacy policy, or applicable law.

MARKETING DATA: We may purchase marketing data from third parties and add it to our existing user database to better target our advertising and to provide pertinent offers in which we think you would be interested. We may also associate this marketing data to the personally identifiable information that you provide to us.

Automatic Data Collection

COOKIES: We use what are commonly called cookies when you use our Site. We use these cookies to identify you as a valid user, to ensure that no one else can sign on simultaneously with your account from another computer and to help us serve you better based on your registration preferences. We may also use cookies to help us facilitate any promotions or surveys that we provide.

PERFORMANCE TRACKING: We utilize a third party service provider to help us track the activity within our Site. This third party may use temporary cookies and/or web beaconing technology to facilitate such tracking but the data would not be tracked in a personally identifiable way. Third parties whose products or services are accessible on our Site may also use cookies, and we advise you to check their privacy policies for information about their cookies and other privacy practices.

When and with Whom We May Share Your Information

VENDORS: We may share your personal information with companies acting as our authorized agents in providing our service (e.g., credit card processing, customer/support services) to you, all of which agree to use it only for such specified purposes. Each vendor must agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to protect your personal information from unauthorized access, destruction, use, modification or disclosure.

LEGALLY AFFILIATED ENTITIES: In the event that *S.M. Davidson & Associates* is merged, or in the event of a transfer of our assets, Site or operations, *S.M. Davidson & Associates* may disclose or transfer your personal information in connection with such transaction. In the event of such a transfer, *S.M. Davidson & Associates* will notify you via email or by posting a prominent notice on our Site for 30 days of any such change in ownership of *S.M. Davidson & Associates* resulting in a change of control of your personal information.

LEGALLY COMPELLED DISCLOSURE: We will also disclose your personal information when required to do so by law, for example, in response to a court order or a subpoena or other legal obligation, in response to a law enforcement agency's request, or in special cases when we have reason to believe that disclosing your personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (whether intentionally or unintentionally) our rights or property.

BANKRUPTCY: You should also be aware that courts of equity, such as U.S. Bankruptcy Courts, may have the authority under certain circumstances to permit your personal information to be shared or transferred to third parties without your permission.

CONSENT TO PROCESSING: By providing any personal information to us, you fully understand and unambiguously consent to the transfer of such personal information to, and the collection and processing of such personal information in, the United States and other countries or territories. Your personal information will be stored and processed on our computers in the United States. The laws on holding personal information in the United States may vary and be less stringent than laws of your state or country. We will use commercially reasonable efforts to hold and transmit your personal information in a safe, confidential and secure environment. If you object to your personal information being transferred or used in this manner please do not register with or use the Site.

Security

S.M. Davidson & Associates endeavors to protect the security of your personal information and your choices for its intended use. We use Secure Socket Layers or SSL technology to protect the transmission of sensitive personal information such as your credit card number. We store your personal information on a secure server, and use procedures designed to protect the personal information we collect from unauthorized access, destruction, use, modification or disclosure.

Although we will take (and require our third-party providers to take) commercially reasonable security precautions regarding your personal information collected from and stored on the Site, due to the open nature of the Internet, we cannot guarantee that any of your personal information stored on our servers, or transmitted to or from a user, will be free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the Site, you acknowledge that you understand and agree to assume these risks.

Modification of your choices and preferences

OPT-OUT RIGHT: If you would like to opt out of any of our marketing programs, or wish to withdraw your consent to us contacting you via your e-mail, fax or phone number, or if your personal details change, please contact us through one of the following: (i) by telephone, at (747) 202-0790 and ask for our Director of Web Marketing; (ii) by email, at Smdson@aol.com by including a copy of the e-mail you have received and by typing "Remove" in the subject line of your e-mail; or (iii) by mail, care of Director of Web Marketing, *S.M. Davidson & Associates*, 18034 Ventura Boulevard, #260, Encino, CA 91316.

Your election not to receive newsletters or promotional and marketing correspondence from us will not: (a) preclude us from corresponding with you, by email or otherwise, regarding your existing or past relationship with us, and (b) preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing your personal information in the course of maintaining and improving the Site.

Your Acceptance of this Privacy Policy

By using this Site, you signify your acceptance of our Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Site. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time so visitors are encouraged to review this Privacy Policy from time to time. Your continued use of our Site following the posting of changes to these terms means you accept these changes.