

# **John R. Robles and Associates**



## **Overall privacy statement**

We take your privacy seriously. Because we gather certain types of information about our users, we want to help you understand the terms and conditions surrounding the collection and use of that information. This privacy statement discloses the types of information we gather, how we use it, and how to correct or change it. These privacy practices apply to the Web site that you were viewing when you clicked through to this policy, which is operated directly by us.

### **1. What information do we collect?**

Our primary goal in collecting personal information is to provide you with the best and most useful content and services. Several of the services and features that we offer on our sites require you to provide us with information as a condition of usage. These include access to subscription-only areas, the ability to post opinions or other content, participation in sweepstakes or contests, subscriptions to print magazines and email newsletters and participation in message boards.

We collect personally identifiable information, such as your name, email address, postal address, phone number, mobile number and credit card information when you provide it to us. From time to time, we may also collect other sensitive information such as your job title, gender, username and password. We may also receive information about you from other sources and add it to the information you provided to us.

Once you register with johnrrobles.com you are no longer anonymous to us.

### **2. How does John R. Robles and Associates use the information?**

We use the information we gather for four general purposes:

1. To customize the advertising and the content you see;
2. To enhance the user experience in our current and future network of sites. We use tracking information to determine how well each page performs overall based on aggregate user demographics and traffic patterns to those pages. This helps us continue to build a better service for you;
3. To fulfill your requests for certain products and services, such as sending out electronic newsletters and enabling you to participate in paid services, polls, contests, and message boards;
4. To send you information you agreed to receive about topics we think will be of interest to you.

### **3. How does John R. Robles and Associates share the information?**

#### ***Personally identifiable information***

We will make your personally identifiable information available to other companies or people when:

1. You have elected to allow us to share that information at the time that you registered with us or provided us the information, or through a subsequent affirmative election through our website.
2. You volunteer information or create a public profile in the course of your participation in our community features such as forums, user opinions and reviews, chat rooms, photo sharing or other forms of public communication and interaction.
3. You use cobranded services (i.e., sites or services that we offer to you in connection with a partner, who is identified on the site). When you use a cobranded service within our network of sites, you grant us permission to pass your registration information back to that service partner. Their use of your information is subject to their applicable privacy policies.
4. We hire third-party vendors to provide specialized services such as customer support; email message deployment; suppression, merge and de-duplication services; data processing; and special products or services that you have requested. These companies are only allowed to use the information in order to help us fulfill our services to you. We do not provide your information to these companies for their own, permanent use.
5. You unsubscribe for a mailing that we send to you on behalf of a third party. We may share your removal instruction with the third party so that it may be added to that person's list of people to whom they may not send emails.
6. You are the winner of a contest or a sweepstakes that is co-sponsored with a third party and that third party needs your information in order to manage the prize fulfillment process.
7. When required by law, such as when we respond to subpoenas, court orders, or legal process.
8. We believe that your actions violate applicable laws, or any usage guidelines for specific products or services, or threaten the rights, property, or safety of our company, our users, or others.

### **4. What are my options?**

Users who would rather not provide any of the user data requested by our registration process do not need to register with us. You can still view much of the content and use many of the services offered by our sites without registering.

We also give users the following options:

1. Opting not to receive our electronic newsletters or those of third parties when registering. Users who opt in may remove themselves from mailing lists at any time through the subscription-management pages or by following the instructions at the end of the e-mail they received from us;

2. Opting not to provide certain personal information when registering for a site, provided, however, that you may not be able to use some of our products or services without providing us with certain information.

**5. How can I review and update my personally identifiable information?**

You can review, correct, or change the information collected during registration for any of our sites. The instructions for doing this can be found in our member-services areas. Users may change information at any time and as often as necessary. Users who are experiencing problems with our services or who have questions about how our services work can contact us using e-mail addresses at the bottom of this page.

**67. How will I know if the privacy policy is changed?**

Any modifications to our privacy practices will be reflected first within this area of our network of Web sites. If there is a material change in our privacy practices, we will indicate on our sites that our privacy practices have changed and provide a link to the new privacy statement. If we are going to be using the information collected from users in a manner materially different from that stated at the time of collection, we will send affected users written notice of the change by e-mail.

**Questions, Comments**

Questions regarding this privacy statement or any other aspects of our network of Web sites should be sent to our offices at

130 Winston Churchill Ave.  
Suite 1, PMB 203  
San Juan, PR 00926-6018

We read every message submitted and try to reply promptly to every one. We may also file your comments to improve the site, or review and discard the information.

Effective date: February 20, 2007