

Privacy Policies Notice
Hutchins Systems, Inc.

Dated: September 1st 2009

Please print this Privacy Policies Notice for your records.

Hutchins Systems, Inc. encourages our client's to review this Privacy Notice from time to time to for additional updated changes.

Changes to the Privacy Notice will be noted by Date Last Updated at the top and bottom of this Privacy Notice.

If your hard copy file contains a prior date, please re-print this Privacy Policies Notice for your records and keep a current copy for future access in your files. .

This privacy statement discloses the privacy practices for Hutchins Systems, Inc. and www.CreditTime2000.com web site.

General Information Privacy Policy

Hutchins Systems, Inc., is dedicate to revolutionizing the way companies process and update their financial lives and small businesses manage their business with the national repositories beneficial Metro 2 reporting guidelines. In that effort, we respect and protect the privacy of those who use our services and our products. When we collect information, we want you to know how your information is used. To demonstrate our commitment to fair information practices, we have adopted leading industry privacy guidelines. This privacy statement defines privacy aspects specific to Hutchins Systems, Inc's processing and/or software products and services.

Because of the financial nature of our business, our products are not designed to appeal to children under the age of 18. Therefore, we do not knowingly attempt to solicit or receive any information from children or allow the reporting of information for children under the age of 18. .

Our Philosophy and Practices

At Hutchins Systems, Inc., we want our client's to feel comfortable and confident when using our products and services. Therefore, the following principles govern our information practices and other aspects of privacy:

- We provide a notice of our privacy information practices.
- We provide choices how the identifiable information that the client provides may be used or distributed based on written service or lease agreement instructions.
- We provide various ways for the client to contact us about our informational practices and other aspects of privacy.

We provide a notice of our privacy information practices.

To maximize the value of our products and services, we may request information from you when you register by contract and use the products or services we offer. When we collect information from you, we'll tell you what is collected, how it is collected, by whom it is collected, why it is collected and to whom it may be disclosed. .

Here is how and why we collect and use information from you:

Registering your file submissions

During the upload registration process we request your name, address, phone number, e-mail address and company name. This information is used to notify our operations division of client utilization for processing or support needs access.

We may share the client identifiable information you provide, as permissible by law to whom adhere to the principles in this statement and our contracted agreements. When you request a specific Hutchins Systems, Inc. product or service, it may be necessary to give a service provider your personal or client information so that they can provide or deliver the product or service you have requested. If you request a partner's product or service from Hutchins Systems, Inc., we may disclose your company name and address to the partner as requested for service. When we collect information from you we give you the opportunity to control the use of that information for purposes other than to fulfill your request for service. You may specify your contact preferences during the registration process or by going to <http://www.CreditTime2000.com> contact us unit authorization access.

This information may also be used in aggregate form to help us evaluate our products and services.

Online services

We provide our clients the opportunity to access online features that will help you better manage your office's consumer/business credit reporting needs or support needs. Some of the functions you may access include: uploading or downloading banking, credit card, accounts receivable files, investment and or loan balances and transactions from your financial divisions or institutions; and bill payments to Hutchins Systems, Inc. online.

Online Account Services through Hutchins Systems, Inc. Online account services through Hutchins Systems Inc. allows your office access to upload or download consumer/business account data files and transactions from your financial divisions or institutions or office entity. You may also be able to pay invoice billings issued or order our leased Credit Time 2000© Metro 2 software by Hutchins Systems, Inc. When you enable online account services (by written agreement) with Hutchins Systems, Inc. you will be asked only for the information necessary to set up your online account, such as password. When you sign up for online account services, you can do so through our general accounting department of Hutchins Systems, Inc. Your online upload access monthly is for your national credit bureau repository financial reporting and the information you provide goes directly to the national selected credit repository as directed under your agreement contract activation (even though you may enter it on a screen within www.CreditTime2000.com). We access or use this information in the manner we have been contracted for performance delivery. We encourage you to review the privacy policy of your entity or financial institution to learn more about its practices related to their collection and use of personally identifiable information. If Hutchins Systems, Inc. is providing the online account service to your entity or institution, the information you provide for the service is transmitted to Hutchins Systems, Inc.

In registering for and using Hutchins Systems, Inc.'s products or services, Hutchins Systems, Inc. collection various contact, identifying and billing information from our client. The type of Information that may be collected, and the typical purpose for which the information may be used, includes but is not limited to, contact information, such as name, company name, addresses, email address's, phone numbers, fax numbers, for authentication and billing purposes. We may also share this information with other reputable third parties that may be required to fulfill a client's request for services.

Identification information, such as Social Security numbers, Federal Tax Identification numbers, or Driver's License Numbers, are used primarily to properly authenticate prospective users and for billing purposes. Billing information, such as credit card numbers, are used to process online purchases or bill payment transactions. Hutchins Systems, Inc. will never willfully disclose any of this information to a third party or use it for any other purpose except as may be required in connection with updating of our general accounting system or an audit of our systems or pursuant to any legal proceedings for a subpoena or court ordered request.

Occasionally, Hutchins Systems, Inc. may use your contact information to notify you of special offers or support related issues as they may arise within the scope of your requested service or product related areas.

We may, using aggregate information only, measure the frequency of usage of online account services for a particular entity institution. This information does not contain any account or transaction-specific data; it is not linked to your individual company information in any way. We also periodically receive aggregated general usage information from credit repository institutions including which online services are used and the frequency of usage.

Hutchins Systems, Inc. Service Partners. You can learn about and purchase or lease additional products and services provided by third party companies through the Hutchins Systems, Inc.'s Home Page Links Directory. Any information you provide these companies is subject to their privacy policies and may be used to contact you. We encourage you to review their privacy policies to learn more about their practices related to the collection and use of personally identifiable information.

Hutchins Systems, Inc.'s additional general information practices:

Mandatory and Optional Information. We identify the information that is necessary to fulfill your entities request. Whenever we ask for additional or optional information, we identify those fields appropriately so that you know what is required to provide the requested service.

Critical Service Alerts. We reserve the right to contact you in response to your requests and orders, to inform you of specific changes that may impact your ability to use a service or for other critical non-marketing purposes, based on your contact and/or agreement preferences.

E-mail Message Formatting. When sending you e-mail we may use a graphics image called a single-pixel GIF or .pdf formats that allows us to (1) format messages that best align with your computer's capabilities and (2) determine, at an aggregate level, the number of graphically-formatted (HTML) e-mails opened. When you click on a link within an e-mail message, you will first pass through our server and then be redirected, if needed, within the valued request.

Service Providers. In some cases, we will employ or work with service providers such as consultants, third party software developers or outsourcers to complete a business process or provide a service on our behalf. For example, we may use service providers to deliver products, or offer online software applications. When we employ service providers, we may need to share your credit entity identifiable information but will request your permission, in advance. Service providers are strictly prohibited from using your credit entity identifiable information for purposes other than to act on our behalf.

Change of Control. Your entity identifiable or consumer/business credit information may be transferred in connection with a sale, merger, transfer, exchange or other disposition (whether of assets, stock or otherwise) of all or a portion of the business of Hutchins Systems, Inc. upon written notice, prior to change of control. Your entity or financial institution

will have the opportunity to opt out of further use of your information following the guidelines established within your agreement terms should any change of control emanate.

Legal Disclosure. In some cases we may be required to disclose certain information to comply with a legal process, such as a court order, subpoena or search warrant.

We give you choices about how the entity identifiable information that you provide us may be used.

We give you the opportunity to control the use of the entity identifiable information that you provide us for purposes other than to fulfill your request. If you would like to specify your contact preferences, call our office at 850-622-2082 Monday through Thursday, 10am – 5pm x 0, Central Standard Time or write to us at Hutchins Systems, Inc., General Accounting, P. O. Box 6943, Miramar Beach, Florida 32550.

We let you update the entity identifiable information that you provide to us.

We provide you the opportunity to update or correct the registration information you provide us by writing to Hutchins Systems, Inc. Inc., P. O. Box 6943, Miramar Beach, Florida 32550, General Accounting, or by going to <http://www.CreditTime2000.com> and clicking on “Contact Us” and filling in the information and submitting your entity information desired.

We work to protect consumer/business and personally identifiable information from loss, misuse, or unauthorized alteration.

We employ industry recognized security safeguards to help us protect the consumer/business and personally identifiable information you provide us from loss, misuse or unauthorized alteration. Whenever we prompt you to transmit sensitive information, such as consumer or business account information, credit card numbers, we support the encrypted transmission of that data.

When you use any of Hutchins Systems, Inc.'s Credit Time 2000® online features, we work to protect your company and any personally identifiable information stored on our sites' servers from unauthorized access using industry standard computer security products such as firewalls, as well as carefully developed security procedures and practices. All Hutchins Systems, Inc.'s employees must review and sign a written statement of these practices, which include limiting access to sensitive information only to those employees who require the information and enforcing strict password protocols for all employees. We use both internal and external resources to review the adequacy of our security measures on a regular basis.

The **goal** of Hutchins Systems, Inc. is to assist our client's with the reporting of their consumer and/or business account's receivable(s) or debtor(s) collection account's or debt purchasing account's to **Equifax, Inc. ©, Experian©, Innovis© and Trans Union©**, the National Credit Repositories.

Keeping with this goal, Hutchins Systems, Inc. wishes our client's to stay informed concerning our company's privacy of information and your office's customer's account activity reported through our web site www.CreditTime2000.com and access within our company.

Hutchins Systems, Inc. supports and adheres to the Fair Credit Reporting Act, Fair Debt Collection Act, any the Fact132 Act and all state and local laws in regarding consumer and/or business reporting practices.

The primary reason for reporting credit information is to provide services or software that our client's have requested and to enroll that client/business into our operational

services or lease purchases. The type of information Hutchins Systems, Inc. requires (before approval) and maintains are for the primary purpose of granting access to our web site www.CreditTime2000.com client services reporting and for the lease purchases of our Credit Time 2000© Metro 2 software for reporting to any national credit repository. The collection of information includes, but is not limited to, the following to establish a business relationship are A and B below:

A) Approved business services information such as:

- 1) Business Legal Name,
- 2) Authorized Agent Legal Name for business services,
- 3) Business Mailing Address,
- 4) Business Shipping Address (if different from mailing address),
- 5) Business Phone Number,
- 6) Business Fax Number,
- 7) Authorized Agent(s) E-mail addresses,
- 8) If applicable, personal guarantor information for contracted or leased services.

B) Billing Information For Approved Consumer and/or Business Services:

To process monthly consumer and/or business credit information data to Hutchins Systems, Inc. in which monthly processing services have been requested through our on-line web site, such as:

National repository processing or consulting to:

Equifax, Inc©, Experian©, Innovis©, and Trans Union© national repositories within the continental United States.

One or more applicable repository entities may apply:

- 1) Processing consumer or business credit data files, monthly, to Equifax, Inc©.
- 2) Processing consumer or business credit data files, monthly, to Experian©.
- 3) Processing consumer or business credit data files, monthly, to Innovis©.
- 4) Processing consumer or business credit data files, monthly, to Trans Union©.
- 5) Consulting with client for credit related issues or client reporting issues resulting from format reporting modifications or upgrades that may uniquely identify a complex aptitude of consumer or business credit files current and historical data structural or non-structural modification under the Metro 2 format reporting guidelines. Reference www.CDIA.com.

Other information Hutchins Systems, Inc. will retain, for client, are three month's of consumer/business processed monthly archival of reported accessible data which may include, but limited to, file structured consumer/business file data that was reported under the Fair Credit Reporting Guidelines, Fair Debt Collection Practice Act and Fact132 Act to one or more national repositories.

In the event the client may forget your client login and password information, required for access to our online www.CreditTime2000.com's E-Z file upload services, E-Mail addresses are collected and use to send notifications, updates and consumer/business application data file service inquiries to that client's audience. All information submitted through www.CreditTime2000.com will become the property of Hutchins Systems, Inc. and only accessible for a prior 3 month archival and stored under a secured server and through our SSL Link access. We also are monitored for secured access through the Trustwave Technology Security Verification© process on a monthly basis to insure our security levels are fully developed and established

Hutchins Systems, Inc. may disclose any of the information processed for Equifax, Inc. ©, Experian©, Innovis© and Trans Union,(the National Credit Repositories), Dun and Bradstreet,

Inc, credit card processors (as required and only with the client's written approval) and to others in accordance and compliance with Fair Credit Reporting Act (FACT) and the Fair Debt Collections Practice Act (FDCPA) and FACT132 requirements, as instructed by the client. As needed, this information is to provide the ability of our accounting, collections and operations departments in their normal course of business.

Hutchins Systems, Inc. restricts access to nonpublic consumer, business and personal information about the client or client's consumer and/or business account identities to only those employees on a "need to know" basis. The maintained information is to provide services to your business through our on-line web site, www.CreditTime2000.com to your national repositories, as directed by client. We also provide lease services and processing through our Credit Time 2000© Metro 2 software for reporting to any national credit repository from your in-house and monthly Hutchins Systems, Inc. systems processing to all national credit repositories.

Hutchins Systems, Inc. maintains physical, electronic and procedural safeguards to protect all company, personal and client consumer and/or business information.

Hutchins Systems, Inc. protects your business and nonpublic consumer, business, and personal information over the Internet by using a secure web server with fully encrypted session licensed SSL certificates. The secure web server allows web browser programs such as Microsoft© or Netscape© to interact with www.CreditTime2000.com's web server via an encrypted session. Hutchins Systems, Inc. employs a Secure Socket Layer (SSL) connection that provides an encrypted connection between the client's computer and www.CreditTime2000.com's on-line web site. The 128 bit encrypted connection scrambles ordinary text or consumer/business data into cipher text to safeguard your sensitive information during access across the Internet. Depending on which browser a client's office may use, a client will know they are in a secured area by "https" or a lock appearing on their terminal display screen. When a client accesses our internal web site, that client may move in and out of secured areas. A new client, at any time, requesting approval access must be under an approved User Servicing Agreement), upon entering consumer and/or business credit data or credit card information on our www.CreditTime2000.com's secured areas.

We provide various ways for you to contact us about our privacy information practices and other aspects of privacy.

If you have any questions about the Hutchins Systems, Inc.'s privacy statement, our information practices or other aspects of privacy, please contact us at <http://www.CreditTime2000.com> or write to us at Hutchins Systems, Inc., General Accounting, Customer Communication, P. O. Box 6943, Miramar Beach, Florida 32550.

Last updated: 09/01/2009

Privacy Policy Changes

Hutchins Systems, Inc. reserves the right to change this privacy policy, without notice, at any time. Upon acceptance of our Credit Time 2000© Lease and Support Agreement or Hutchins Systems, Inc.'s Monthly Processing Agreement, as a client, you agree to changes in this privacy policy electronically or by visiting our web site, www.CreditTime2000.com. Hutchins Systems, Inc. encourages our client's to review this privacy policy from time to time to for additional updated changes.

Any changes will be noted by the Date Last Updated.

Date Last Updated: 09-01-2009

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