

## **GIFT ANNUITY NOW**

### **PRIVACY POLICY**

This Privacy Policy explains our policy regarding the collection, use, disclosure and transfer of your information by Gift Annuity Now, LLC, a Texas limited liability company (the "Company"). As we update and expand our services, this policy may change, so please refer back to it periodically. By accessing our website or otherwise using our service, you consent to our information practices. As used herein, "you" means the Member and any of its Authorized Representatives, directors, officers, employees, agents or representatives.

#### **1. Collection and Use of Information**

We receive and store information, including personal information, about you, your Authorized Representatives and your use of our services. This information is gathered in a number of ways, including when you enter it on our website and from interactions with our service. Personal information is information that can be used to uniquely identify or contact you. Non-personal information is information that does not permit direct association with you. We may collect, use, transfer and disclose non-personal information for any purpose. You can choose not to provide personal information we may request of you, but, in general, most of the personal information we request is required in order to provide our service and the lack of such personal information will prevent us from doing so.

When you interact with us, we may ask you to supply us with personal information so that we can provide, enhance and personalize our services and marketing efforts. For similar reasons, we may supplement the personal information you provide with publicly available information about you as well as information from other sources, as permitted by law. We use this personal information, for example, to process your Membership Agreement, your payments, and to communicate with you on these and other topics. We also may use your e-mail address or other methods to send you newsletters, as well as messages about new features, special offers, promotional announcements, consumer surveys and other correspondence concerning our services. If you no longer want to receive certain communications from us, simply access the "Email preferences" link on the "Your Account" page and uncheck those items to unsubscribe. Please note that you cannot unsubscribe from certain correspondence from us, including messages relating to your account transactions.

We keep track of your interactions with us and collect information related to you and your use of our service, including but not limited to: your online activity, payment history, correspondence, Internet protocol addresses, device types, unique device data (such as device identifiers), operating systems and related activity. We use this information for such purposes as determining your general geographic location, providing localized content, enforcing our terms, determining your Internet service provider, helping us quickly and efficiently respond to inquiries and requests and otherwise enhancing or administering our services for you and other members.

From time to time, we may partner with companies whose products we believe will interest our members. In conjunction with these partners, we may send promotional announcements and/or serve web-based advertisements on their behalf, as permitted by law. You can go to the "Email preferences" link on the "Your Account" page and request that your name be excluded from marketing emails.

#### **2. Disclosure of Information**

We may share your information with affiliates, which are parents, subsidiaries or companies that have the same owners as the Company. Any affiliate that receives or has access to personal information will have adopted a privacy policy similar to this Privacy Policy. In addition we may use other companies, agents or contractors to perform services on our behalf, such as infrastructure and IT services, web page design, payment processing and other services applicable to the Company's business. In the course of providing such services, these other companies may have access to your information. We do not authorize these companies to use or disclose your personal information except for the purpose of providing the services we request of them.

The Company also reserves the right to disclose personal information if it reasonably believes that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues, or (d) protect against harm to the rights, property or safety of the Company, its customers or the public as required or permitted by law. In connection with any reorganization, restructuring, merger or sale, or other transferring of assets we reserve the right to transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our privacy policy.

### **3. Right to Access Your Information**

You are responsible for updating and maintaining the truth and accuracy of the personal information you provide to us relating to your account. If you want to access or alter your contact information, an Authorized Representative should contact the Company. If you have a question regarding our privacy practices, or want to exercise your rights regarding your personal information, please contact us.

### **4. Cookies and Other Technologies**

As you interact with our service, we and our service providers may place cookies on your system. Cookies are small pieces of data that are sent to your browser from a web server and stored on your system for record keeping purposes. In general, cookies can make the Internet more useful by storing information about your preferences on a particular system.

In addition to cookies, we and our service providers use a variety of other technologies, including pixel tags (web beacons), clear gifs, or other technologies built into our software to gather information on how users interact with our services. These cookies and other technologies can help personalize the service for you and help associate your interactions with our services to other information within your account. They can show us information that can be used to improve, operate and monitor our website and other aspects of our services.

The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If your browser is set to not accept any cookies, you may not be able to use the Company's services or website.

### **5. Security**

The Company takes information security very seriously and uses reasonable administrative, technical, physical and managerial measures to protect your personal information from unauthorized access. For example, we utilize Secure Sockets Layering, an industry-standard protocol for certain of your transmissions to us, in order to encrypt certain personal information that you send to us through the registration and sign up process.

Unfortunately, no security system can be guaranteed to be 100% secure. Accordingly, we cannot guarantee the security of your information and cannot assume liability for improper access to it. By using our service, including our website and user interfaces, or providing information to us through any means, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Company's services.

In order to provide you with ease of access to your account and to help administer the Company's services, the Company may implement technology that enables us to recognize you as the account holder and provide you with direct access to your account without requiring you to retype any password or other user identification when you revisit the Company's services. You are responsible for maintaining the confidentiality of your account access information and for restricting access to your computer. If you disclose your password to anyone or share your account and/or devices with other people, you take full responsibility for their actions. Where possible, users of public or shared devices should log out at the completion of each visit.

## **6. Changes to This Policy**

As we update and expand our services, we may make changes to this policy. You should check back for updates to this policy from time to time. You acknowledge that your assent to the Terms of Use and Privacy Policy subsequent to any changes made following your initial consent as well as, your use of the Company's website or continued use of our services after our posting of changes to this policy, means that you agree to be bound by such changes. The most current version of this Privacy Policy can be reviewed by visiting our website located at [www.giftannuitynow.com](http://www.giftannuitynow.com). The most current version of the Privacy Policy will supersede all previous versions. We will post prior version(s) on our website when the Privacy Policy is updated. You can see changes from previous versions of the Privacy Policy by visiting our website and clicking here.

## **7. Contacting Us**

If you have questions concerning your account, please contact the Company. If you have questions concerning this Privacy Policy, including the treatment of your personal information and/or our use of cookies and other technologies, please contact us via email at [info@giftannuitynow.com](mailto:info@giftannuitynow.com), or at the following:

Gift Annuity NOW, 6200 LBJ Freeway, Suite 200, Dallas, Texas 75240-6331.

*This Privacy Policy was last updated November \_\_, 2012.*