



## PRIVACY POLICY

Goodwin Benefits Group ("GBG," "we" or "us") provides a variety of online services and products, including without limitation, subscription, newsletter and update services ("Services"), to subscribers via email and on numerous websites throughout the World Wide Web (the "Sites"). GBG is strongly committed to protecting the privacy of your personal information, and providing a safe and secure environment for its subscribers. THE PURPOSE OF THIS GBG PRIVACY POLICY (THE "POLICY") IS TO HELP YOU UNDERSTAND THE KINDS OF INFORMATION WE MAY GATHER ABOUT YOU WHEN YOU VISIT THE SITES OR USE ANY OF OUR SERVICES, HOW WE MAY USE THAT INFORMATION, IN WHICH MANNER WE WILL DISCLOSE IT, AND HOW YOU CAN CORRECT AND/OR UPDATE THE INFORMATION. PLEASE NOTE THAT BY USING THE SERVICES OR VISITING THE SITES, YOU SIGNIFY YOUR AGREEMENT WITH THIS POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS POLICY, PLEASE DO NOT USE THE SERVICES OR REFRAIN FROM VISITING THE SITES.

Please note that the Policy applies only to GBG's Services and Sites, but not to other websites to which we may link, or to advertisers on the Sites. Additionally, your use of the Services and/or the Sites is governed by GBG's Terms of Service, as well as by any other published rules pertaining to either a particular Site or Service.

### Children's Information

GBG's policy is that it does not knowingly collect personally identifiable information from subscribers under thirteen years of age. The Services or Sites are not directed or intended for children under thirteen years of age. If you are under thirteen years of age, you should not register to become a Subscriber or provide personally identifiable information on any of the Sites. If you are the parent or guardian of a subscriber under the age of thirteen whom you believe has disclosed personally identifiable information to GBG, please contact GBG at sales at [cgoodwin@goodwinbenefits.com](mailto:cgoodwin@goodwinbenefits.com) so that we may delete and remove such subscriber's information from our systems.

### The Information We Gather

GBG collects information from you at several different points on the Sites or through use of the Services in various ways. For example, GBG continually reviews its visitors' demographics, interests and pages viewed, and GBG may require its subscribers and users to provide certain personal information if they wish to participate in various activities on the Sites (e.g., consummating transactions and entering into contests, drawings or surveys). However, GBG can only collect your personally identifiable information if, and when, it is voluntarily offered. Whenever we collect personal information, we will make an effort to include a link to this Policy on that page.

### Message Board and Chats

Among the many Services which GBG offers subscribers on the Sites, we provide message boards and chat rooms. Please be aware that any visitor may read your postings on a message board or in a chat room. Furthermore, any information which you may post to a message board or in a chat room, including your profile information, will be disclosed and available to all users of that message board or

chat room, and is therefore no longer private. GBG cannot guarantee the security of such information that you disclose or communicate online in public areas such as message boards and chat rooms, and you do so at your own risk. GBG reserves the right to republish your postings from message boards or chat rooms elsewhere on the Web in any format.

#### How We Use the Information That We Gather

GBG uses certain technologies, such as "cookies," to personalize and improve your online experience.

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive. Cookies store information about your visit to the Sites or your use of the Services, thereby allowing you to access certain GBG's features not otherwise available. The information in the cookie is transmitted from your computer to GBG or to one of our third-party authorized service contractors. The information contained in these cookies makes it possible for our systems to know if you are presently logged onto a Site or using any of the Services, or whether you have done so in a prior visit. This technology enables GBG to instantly determine your access privileges while allowing you to navigate the Sites or use any of the Services without having to repeatedly log in.

Cookies from GBG and/or one of our authorized service contractors are also used to collect standard information transmitted from your web browser including, without limitation: your Internet address, browser type, web pages you visited with date and time, purchases you made on any of the Sites and the type of operating system on your computer. This information is used to help us understand and meet the ever-changing needs and interests of our subscribers.

GBG may also use cookies to track your access to, and use of the message boards, forums and chat rooms on the Sites, as well as your responses to any of our online surveys.

You always have the option of setting your browser to warn you when a cookie is being accessed on your computer or to decline cookies altogether. However, to take full advantage of the Sites, Services and features offered by GBG, we recommend that you set your browser to accept cookies. Setting your computer to accept or refuse cookies varies depending on the web browser you are running. Please check the help tab of your browser for specifics on your software.

GBG does not control any cookies you may receive from an advertiser and these are not subject to this Policy.

GBG also uses web beacon technology to help track site usage. Web beacons (also called single pixel gifs or action tags) allow GBG to track page viewing counts and patterns which we use to focus and tailor future content development, measure the effectiveness of GBG's own marketing campaigns and assist with broadband capacity management for the Sites.

GBG also employs web beacons within the context of certain e-mails in order to determine the effectiveness and appeal of those mailings. These web beacons 'sense' and notify GBG if and when you open the e-mail, if your e-mail program is capable of displaying HTML messages, and where you may navigate within these HTML messages.

In addition to the foregoing, GBG uses the information obtained from its subscribers and users in order to enhance and customize their online experiences.

Due to the existing regulatory environment, GBG cannot ensure that all of your personally identifiable information and communications will remain private and will never be disclosed in ways not otherwise described in this Policy. Therefore, although we maintain and make every effort to comply with industry privacy standards, we do not promise, nor should you expect, that your personally identifiable information or private communications will always remain private.

As a matter of policy and unless otherwise stated herein, GBG does not rent, sell, or share your personally identifiable information with other people or non-affiliated companies. However, GBG reserves the right to use your personally identifiable information to notify you of certain products or Services about which you previously inquired or requested, special promotional offers, and to investigate violations of the terms and provisions of this Policy or the Terms of Use. In addition, GBG aggregates (gathers and organizes data across all subscriber and user accounts) personally identifiable information from among its subscriber and user base and discloses only that portion of the information which is non-personally identifiable to advertisers and other third parties for marketing, promotional and other commercial purposes. For example, your name, email address, password, credit card number and bank account number will never be disclosed without your express prior written consent.

Disclosure of Personal Information in the Event of Merger or Sale of Assets GBG, its parent, subsidiaries or affiliates, could merge with or be acquired by another business entity, or all or substantially all of their respective assets could be acquired. Should such a combination, acquisition or transaction occur, you should expect that GBG will share some or all of your personally identifiable information with the acquiring or merged entity in order to continue serving you and others information, updates and offers concerning the Sites or Services.

#### Co-branded and Other Affiliated Sites

As stated above, certain information or Services offered or provided through the Sites may, from time to time, be provided on or through other websites operated by or in conjunction with third party providers ("Partners"). These websites and the features thereon may have the same "look and feel" as GBG's Sites and/or Services. GBG terms these websites "co-branded sites", and often times a Partner's logo or name may appear on the website, or the Partner's name may appear in the URL. Although GBG will continue to own any personally identifiable information collected about you from one of these co-branded sites, such information may be shared by GBG with that Partner. However, a Partner will not rent, sell, or disclose any of your personally identifiable information to third parties unless you consent to such disclosures and use in advance (for example, you may be asked to opt-in on a particular co-branded site in order to receive information or offers from a Partner, its affiliates or agents).

#### Third Party Links

GBG does not monitor, control or endorse the information collection or privacy practices of any third parties including, without limitation, any co-branded, Partner or affiliated sites which may or may not be owned or operated by or in conjunction with GBG or other third parties who may provide services throughout the Sites. Please be aware that the Sites may contain links to other websites on the Internet and the Services may be provided by such third parties GBG assumes no liability or responsibility for the information collection and privacy practices of such third party. Please consult each website's privacy policy. In addition, GBG is not responsible for the content or data collection practices of any third party websites, including a third party's use of cookies or other data-collection applications. Even though certain information collected by such third parties might not identify you personally, we strongly encourage you to become familiar with their privacy practices, and to contact them if you have any questions about their respective privacy policies and practices.

On behalf of various sponsors, the Sites may provide sponsored links to third-party websites or resources ("Linked Sites"). GBG neither controls nor have we reviewed or approved the content that appears on such Linked Sites. You acknowledge and agree that GBG is not responsible for the legality, accuracy or inappropriate nature of any content, advertising, products or other materials on or available from such Linked Sites. You further acknowledge and agree that GBG shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods, and services available on or through any such Linked Site.

#### Security

GBG places a priority on the security of personally identifiable information, and we undertake reasonable security measures that comply with federal regulations to protect the data that resides on our servers. GBG also uses secure server software (SSL) to process all transactions which occur on the Sites. SSL encrypts all of your personal information transmitted over the Internet, including your credit card number, name and address. However, no security system is impenetrable. GBG cannot warrant or guarantee the security of its servers, nor can it guarantee that information supplied by Subscribers or other users will not be intercepted while being transmitted to GBG over the Internet.

#### Correction/Updating Personal Information

If your personally identifiable information changes (such as your address, zip code), or if you no longer desire to use or access one of the Sites or Services, GBG encourages you to correct, update or remove the personal information that you provided. This can be done at the "Manage My Account" page on each of the Sites. Keep in mind, however, that even if you delete your account from GBG's records, there will be residual information that will remain within GBG's databases, access logs, and other records, which may or may not contain personally identifiable information.

#### How to Contact Us

Please relay any questions you may have pertaining to our above stated policies to our Customer Service Department - 972.503.4248, or email us at [cgoodwin@goodwinbenefits.com](mailto:cgoodwin@goodwinbenefits.com).

#### Privacy Policy Changes

If GBG makes changes to any of the terms or conditions of the Policy, the changes will be posted in this document so that you will always know what information we gather, how we might use that information and to whom we will disclose it. We reserve the right to change, modify, add or remove portions of this Policy at any time, and any changes will become effective immediately upon being posted unless GBG advises you otherwise. Your continued use of the Services and/or the Sites after this Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of the Policy, as amended. We encourage you to bookmark this web page and review this Policy regularly.

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