

Access Wealth Planning – Privacy Policy

Effective as of May 2016

Welcome to the Access Wealth Planning web site, www.awplan.com (the “Site”). The following **Privacy Policy** tells you about the information we, and our subsidiaries or affiliates, collect through the Site and in any other way, including but not limited to you providing your contact information to receive information on our services or subscribing to our newsletters. In addition, it explains how we use that information and how you can opt out of certain uses of information we may collect. By using our services, providing your personal information and/or accessing our Site, you are consenting to the information collection and use practices described in this statement, as modified from time to time by us. If this Privacy Policy is not acceptable to you, please do not use this Site or provide your personal information. If we decide to materially change our privacy policy, we will post a new statement on our Site. Therefore, we encourage you to check the date of our privacy policy whenever you visit this Site for any updates or changes.

Reference to “we” or “us” is the owner of the Site including any company it controls or which controls it (for example a parent company of the Site owner or a subsidiary of the Site owner) and its members, directors, officers, employees and agents.

Information About You

We collect several types of information about you. We collect “personal information” that you provide if you submit your contact information through the Site: namely, your first and last name, mailing address, online contact information, such as your email address, and phone number. We also collect “non-personal information” that you provide, which is information about you that does not itself identify you individually. Examples of non-personal information include age range and gender. We also collect your geolocation, IP Address, operating system, hardware details, device settings, software, browser type, language, connection information, and other information which helps us improve the Site in various ways including by optimizing our software to serve you and by monitoring usage for violation of security safeguards, the Terms of Use accessible at the bottom of our website, www.awplan.com. We also collect “aggregate information,” which is information that helps us understand how people use our Site or our services, for example, which pages are visited, frequency of usage, paths of usage, interactions between users, and interaction with other software. The information we collect depends on what services you use on our Site or otherwise. The following is a more detailed explanation of these types of information as well as when and how we collect and use them.

Use of Your Personal and Non-Personal Information

Except as disclosed in this privacy policy, we do not sell, rent, lease or disclose information that identifies you individually or makes it possible for other parties to contact you directly without your consent. Unless we have your permission or are required by law, we only share your personal information with our related companies and third parties who are acting on our behalf for the uses described below. We may, however, use, sell, disclose or otherwise dispose of

personal information we collect in the following circumstances:

Data Integrity

We process personal information for the purposes for which it was collected and in accordance with this Privacy Policy. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed in connection with the uses set out in this Privacy Policy.

Internal Use of Your Information

We may use the information we have to help create and improve the Site for users. For example:

- We will use your email address to notify you about subscriptions you have requested, to contact you about the Site, and to permit you to log in, where applicable.
- Information we have is used to improve safety and security, including for violation of our terms and policies. I don't really know what this means but ok.
- We use information about you for statistical, design or operational purposes such as to estimate our audience size, to measure aggregate traffic patterns and/or to understand demographics, customer interest, consumer insights, purchasing and other trends among our users and customers.
- We may choose to conduct research about our Site, including new features, in surveys, and other testing to collect feedback for improving our Site.
- We may use your personal information for the marketing and/or promotion of us, the Site, our subsidiaries and/or affiliated companies, including their products and services.
- Additionally, we use your information to respond to your customer service inquiries.
- Other sites or services may receive information about you and your content if you use our Site on any third-party apps, websites, or other services. I don't know what this means

We may outsource all of these tasks to third parties on a confidential basis. If you do not want to receive promotional email or other materials from us or the third parties we have engaged, please unsubscribe when you receive an email or send your opt-out request to info@awplan.com

Tracking Tools

We may use browser-based “cookies,” users’ IP addresses, and other technologies to help us obtain aggregated information about visits to the Site, deliver content specific to your interests, process your requests, and/or to analyze visiting patterns, monitor traffic patterns on the Site, and to optimize and enhance the online experience for everyone who visits the Site. “Cookies” are pieces of information stored within your computer’s or device’s Internet browser that

automatically identify your browser to our server whenever you interact with the Site. Such technology is a common feature of many web sites and is necessary in order for certain features of our site to function properly or in order to provide an online service to you. We also use cookies to help us understand which areas of the Site are useful or which areas may need improvement. We do not receive any personally identifiable information within cookies. We may combine information which we obtain through the use of cookies with other information, including a unique identifier we have assigned to you if you have registered with our site, or with information we obtain from third party sources that you have authorized.

Managing Tracking Tools

You may customize the browser settings to notify you when a cookie is sent or to disable cookies altogether. Please check your browser for instructions on how to make these adjustments. Because cookies allow you to take advantage of some of the Site's essential features, we recommend that you allow them on your browser. However, if you choose to disable this function, your experience on the site may be diminished and some features may not work as intended. Your browser may also have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are not uniform, so we are not currently set up to respond to those signals. If you do not want your online behavior tracked by us, then please do not use the Site.

Offers from Subsidiaries and Affiliates

We may send you (or arrange to have sent to you) our (or our subsidiaries' and affiliates') marketing and promotional information. We do not share your personal information with unrelated outside third parties unless such disclosure is required for transaction processing as mentioned above. If you do not want to receive these materials, please unsubscribe when you receive an email or send email your opt-out request to info@awplan.com.

Disclosures to Comply with Legal Requirements

We may disclose personal information:

- (a) to conform with the law, respond to claims or comply with legal process served on us (e.g., a lawful subpoena, warrant or court order);
- (b) to enforce or apply our policies or agreements (including to initiate, render, bill and collect for amounts owed to us);
- (c) to protect and defend our or our users' rights or property, the Site, our employees, users or the public, including fraudulent, abusive or unlawful use of our Site; or
- (d) if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.

Company Sale

Information collected through our Site is considered a trade secret owned by us. As the owner of such information, we may disclose or sell such information as an asset of the company in

conjunction with the sale to a third party of our company or a portion of our assets.

Aggregate Information

We collect aggregate information about you and your use of our Site whenever you visit our Site (see “Information About You” above). For instance, we may collect various forms of “click stream” information such as entry and exit points for our Site (i.e., referring URLs or domains), site traffic statistics, page views, impressions, and operating system and browser type. In addition, when you request pages on our Site, our servers automatically log your IP addresses. An IP address is a number that is automatically assigned to your computer whenever you are surfing the internet.

We also may use third-party software that tracks traffic directed to the Site from affiliate sites. This information is aggregated and is not tied to individual use.

This aggregate information generally will not identify you or be correlated to you individually for external purposes. We may collect, compile, store, publish, promote, report, or otherwise disclose or use any and all aggregate information provided that such information does not reveal your identity. When we share such information with other companies, it is not traceable to any particular user, and will not be used to contact you. If we do correlate any aggregate information to you, such information will be treated like any other personal information under this statement.

Links to Other Sites

Please be aware that we may provide links to third-party web sites or our promotional partners’ sites as a service to our users, and that we are not responsible for the content or information collection practices of those pages. Please note that these web sites’ privacy policies may differ from ours. We encourage you to review and understand their privacy practices before providing them with information.

Children

Our Site is intended for a general audience. However, it is not designed nor intended to collect personal information from children under the age of 18. To respect the privacy of children and to comply with the Children’s Online Privacy Protection Act, children under the age of 18 are not permitted to use the Site. We ask that parents supervise their children while online.

Security

We are committed to safeguarding and securing your personal information. To maintain data accuracy, prevent unauthorized access to or disclosure of, and ensure the appropriate use of your personal information, we have put in place physical, electronic and managerial procedures. Such procedures represent our best efforts to maintain security and we work continuously to enhance security.

Choice/Opt-Out

We will not use or share your personal information in ways unrelated to the uses described above without first notifying you and offering a choice. We will also provide you the opportunity to opt-out at any time of certain or all contact from us. You may also choose to change information associated with your account, including your registration name and address, business and home addresses, and user name and password. As noted above, we may use your e-mail address and other contact information provided to us through the Site to send notifications to you. If you do not want to receive such notifications (with the exception of those related to your subscriptions on the Site), you can change your privacy preference and remove yourself from our notification e-mail list at any time by sending an email with your request to info@awplan.com. If you have any difficulty with opting out, please call us at 973-740-2400.

Access and Accuracy

We strive to keep your personal information accurate. We will make reasonable efforts to provide you with access to your personal information. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting you access or enabling you to modify or correct any such information. To access your personal information, please send your request to info@awplan.com. We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, would be extremely impractical, or for which access is not otherwise required.

Notwithstanding any preference that you select, we may contact you from time to time to provide services that you have requested or for customer service matters, such as responding to service-related inquiries, updating our policies or notifying you of changes to existing services.

If you have any questions about this Privacy Policy or our use of your information, or if you need help changing or deleting your information, you can e-mail us at info@awplan.com or call us at 973-740-2400.

California Privacy Policy

As a California resident you have the legal right to request from businesses with whom you have an established business relationship, (1) a list of the categories of personal information, such as your name, address, email address and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes, and (2) the names and addresses of all such third parties. To request the above information, please email us at with a reference to California Disclosure Information info@awplan.com or call us at 973-740-2400.