# PRIVACY POLICY

**EFFECTIVE DATE: JANUARY 1, 2017** 

Family First Life, LLC (hereinafter referred to as "Company") created this privacy policy ("Privacy Policy") to explain how we use personal information, as defined below, and to give you assurance of our commitment to fair information practices and to the protection of your privacy as you visit and use the Family First Life, LLC website (the "Website").

We understand that you value your privacy and the right to control how your personal information is collected and used. Our data collection and retention practices are designed to provide transparency, accountability and choice regarding the management and use of your personal information.

We also provide you with contact information should you wish to remove your personal information from our databases.

The Website is intended for users who are located in the United States of America and the Privacy Policy shall be interpreted under the laws of the United States. By registering on the Website, you explicitly accept, without limitation or qualification, the collection, use, and transfer of your information in the manner described in this Privacy Policy. Please Privacy Policy carefully as it affects your rights and liabilities under the law.

If you do not agree to our practices and/or our Purchaser Lead Services Agreement, please do not interact in any manner whatsoever with or provide any personally identifiable information on the Website. Please contact us if you have any questions or comments about our privacy practices or this Privacy Policy. You can reach us via postal mail at the following address:

Family First Life 80 Norwich – New London Tpke. Suite 1B Uncasville, CT 06382 USA

THIS WEBSITE IS NOT INTENDED FOR ANYONE UNDER THE AGE OF EIGHTEEN (18) OR PERSONS RESIDING OUTSIDE OF THE UNITED STATES. BY USING THE WEBSITE, YOU EXPRESSLY REPRESENT AND WARRANT THAT YOU HAVE READ, UNDERSTOOD AND AGREE TO THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT UNDERSTAND OR DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, YOU MUST IMMEDIATELY LEAVE THE WEBSITE.

# 1. TYPES OF INFORMATION WE COLLECT

Company collects information about you by and through your access to and use of this Website and through your use of our lead provision services (the "Services"). The

information that we collect during inquiry and/or registration includes personally identifiable information ("PII"). PII is unique data of an individual used for identification and communication purposes. Any use of our Services is entirely voluntary and you are not required to provide PII unless you choose to use our service. However, you will not be able to access or use our service where PII is required. PII that may be collected includes information such as your first name, last name, date of birth, telephone number, health, mailing and home address, zip code, or e-mail address (collectively referred to herein as "PII").

We may also collect certain non-personally identifiable information ("NPII") about you when you visit many of the pages of this Website. NPII is data used in the aggregate to analyze trends, administer the Website, track movement and understand visitor behavior generally. The information collected by virtue of your access to and use of this Website may be collected irrespective of whether you submit information to register for our services. This NPII includes, without limitation, the type of browser that you use, your Internet Protocol ("IP") address, the type of operating system that you use and/or the domain name of your Internet service provider. An IP address Internet.

We may share NPII with third parties, in our discretion.

# 2. HOW YOUR PERSONALLY IDENTIFIABLE INFORMATION IS USED AND SHARED

We ask you for PII when you inquire about and/or register for our Services. We value your privacy and have taken the necessary precautions to be in compliance with relevant legislation, including, without limitation, the California Online Privacy Protection Act.

Broadly speaking, the information collected by and through your access to and use of this Website will be used to fulfill your request and for solicitation purposes with respect to third party products, services, offers or promotions. Such collected information may also be used for other purposes for which you have given your consent, to prevent fraud, or as may otherwise be permitted by applicable law. To those ends, you expressly authorize Company to share such collected information as set forth herein.

We use the PII collected from you to facilitate your inquiry regarding and/or request for the purchase, acquisition and use of third party prospect data obtained via quote request forms, telephone calls and/or telephone call transfers ("Lead" or "Leads") including, without limitation, insurance Leads. Company may share your PII with third parties who help us in the delivery the services you have requested and to companies/individuals we employ to perform technical functions on our behalf. These companies and individuals may not share that information with any other third party or use that data for any other purpose. We may also use your PII to resolve disputes, troubleshoot technical problems, enforce our agreements with you and to enable Company and/or

third parties to personalize your Internet experience. We may also share the information we collect from you with consumer reporting and related agencies.

We may disclose any/all information if legally required to do so, or at our discretion pursuant to a request from a governmental entity, or if we believe in good faith that such action is necessary to: (a) conform to legal requirements or comply with legal process; (b) protect our rights or property or our affiliated companies; (c) prevent a crime or protect national security; or (d) protect the personal safety of users or the public.

We may also disclose and transfer any/all information to a third party who acquires any or all of our business, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets. In addition, in the event we become the subject of an insolvency proceeding, whether voluntary or involuntary, we or our liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of such information in a transaction approved by the court. In each of these situations, the recipients of your data may potentially be located in any country in the world.

### TARGETED ADVERTISING

Company may target advertising to you using direct mail, e-mail and/or telemarketing calls. Company may match your PII to make and improve profiles of you, to track your online browsing habits over time and across different websites on the Internet, to show you targeted advertising for products and/or services and/or to determine which areas of the Internet are most frequently visited.

By visiting and/or supplying your PII during the inquiry and/or enrollment process, you also agree to allow us to provide aggregated anonymous data about you to third parties so that they can understand the kinds of visitors to the Website and in order to offer you products and services. This includes demographic information and behavioral information.

For more on how your PII is used by Company, please see divs 3 and 4, below.

YOU MAY OPT-OUT OF RECEIVING ANY COMMUNICATIONS FROM US BY CHOOSING NOT TO SUBMIT YOUR PERSONAL INFORMATION. IF YOU HAVE ALREADY SUBMITTED YOUR PERSONAL INFORMATION TO US AND WISH TO OPT-OUT AND HAVE IT REMOVED FROM OUR DATABASE, YOU MAY DO SO BY SENDING US A REQUEST HERE. IF YOU REMOVE YOUR INFORMATION FROM OUR DATABASE IT WILL NO LONGER BE USED FOR SECONDARY PURPOSES OR TO SEND PROMOTIONAL COMMUNICATIONS.

### 3. E-MAIL AND TELEMARKETING

By inquiring about and/or registering for our Services and as set forth in the preceding div, you expressly acknowledge that Company may target advertising to you using, without limitation, e-mail and telemarketing calls.

If you provide your express consent to receive telemarketing calls, Company may use your PII (including any information which may reasonably be derived therefrom) to advertise, directly or indirectly, using the telephone number provided, including your mobile telephone number, in order to facilitate your request for the purchase, acquisition and use of Leads and/or regarding other products and/or services which you may be interested in (notwithstanding that your number(s) may be listed on a corporate, state, or federal Do-Not-Contact registry, suppression list, or the like).

By inquiring about and/or registering on our Website and using our Services, you agree that such registration and request constitutes a purchase, an inquiry and/or an application for purposes of the Amended Telemarketing Sales Rule, 16 CFR §310 et seq. (the "ATSR"). Notwithstanding that your telephone number may be listed on the Federal Trade Commission's Do-Not-Call List, you have authorized us to contact you via telemarketing in accordance with the ATSR. Should you expressly authorize telephone solicitation, please note that, depending upon your individual carrier and plan; message and data rates may apply to any/all telemarketing campaigns. For any/all telemarketing campaigns, you expressly agree that you are solely responsible for and authorized to incur any such charges, that you are eighteen (18) years of age or older and that you are authorized to use the mobile device. Your wireless carrier and other service providers may also collect data about your wireless device usage, and their practices are governed by their own policies.

# 4. COOKIES, WEB BEACONS, PIXEL TAGS, LOG FILES AND ONLINE BEHAVIORAL TECHNOLOGIES

The Website, Services and e-mail messages may contain first-party (Company-related) cookies, web beacons, pixel tags, browser analysis tools and web server logs that enable Company to track your online behavior, collect information regarding your operating system and browser type, record what webpage or e-mail you viewed, track the IP address of the device you use to interact with the applicable online service, record when you open or click on a particular online advertisement link or webpage, and additionally for other information gathering purposes such as the language your system uses and the country and time zone of your device.

A cookie is a small file uniquely assigned to you by a webpage server when you visit a webpage or click on a link and can assist in associating your information to a unique profile. Cookies are stored in web server logs and also in web cookies kept on your computer, which are then transmitted back to us. They store information about your account, preferences, your use of the Website and Services, and your online browsing habits. They allow us to recognize you when you return, and track and target your interests in order to provide a customized experience. They also assist with the

provision of a customized browsing experience and with the detection of certain kinds of fraud.

Some cookies are temporary, whereas others may be configured to last longer. "Session" cookies are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases session cookies once you exit your browser. "Persistent" cookies are more permanent cookies that are stored on your computer even beyond when you exit your browser. Your browser preferences can be modified to accept or reject all cookies, or request a notification when a cookie is set.

Pixel tags and web beacons are tiny graphic images placed on website pages or in emails that allow Company to determine whether you have performed specific actions. When you access these pages or open e-mail messages, the pixel tags and web beacons generate a notice of that action. These tools permit the measurement of responses to communications and improve related promotions. You may read more about web beacons at webopedia.com.

Log files include IP addresses, browser type, Internet service provider, referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer a website, track user's movement in the aggregate, and gather broad demographic information for aggregate use.

As set forth herein, Company collect many different types of information from cookies and other technologies, including, without limitation, what website you were visiting before you came to the Website, the website you visit after you leave the Website, and other activities or yours over time and across third-party websites and online services.

#### 5. MANAGING YOUR PRIVACY

We believe that you benefit from a more personalized experience when we know more about you and what you like. However, you can limit the information you provide to us and thereby limit the communications that we send to you.

To prevent first party online tracking from cookies, web beacons and other technologies on a webpage or within an e-mail message, do not visit the Website or use the Services, utilize a changing IP address and do not click on or interact with any advertisements or links.

Visit cookiecentral.com and boutads.info to read more about cookies, including, without limitation, how you can modify your browser preferences to accept or reject all cookies, or request a notification when a cookie is sent (for example, from within Internet Explorer, Firefox, Safari, Google Chrome). As each browser is different, please check the help div of your browser for instructions on how to remove cookies and learn about other privacy and security settings that may be available.

Because an industry-standard Do-Not-Track protocol has not yet been established, Company's information collection practices will continue to operate as described in this Privacy Policy regardless of any "Do Not Track" signals that may be sent by certain browsers or selected by you. If you wish to opt-out of receiving communications from Company, you can follow the opt-out instructions in the respective communications that are sent to you.

To prevent online tracking from cookies, web beacons and other technologies within an e-mail message, unsubscribe from the e-mail list using the unsubscribe link provided.

# 6. SECURITY OF YOUR PERSONALLY IDENTIFIABLE INFORMATION

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information we gather online, Company stores your PII in a database on secure systems. We have put in place appropriate physical, electronic and managerial security procedures to protect against the loss, misuse and alteration of the information under our control.

Access to this information is strictly limited, and not accessible to the public. Only employees who need the information to perform a specific job are granted access to PII. Our employees are dedicated to ensuring the security and privacy of all user information, to the extent reasonably possible. Employees who do not adhere to our firm policies are subject to disciplinary action.

But notwithstanding such measures, Company cannot guarantee that its security measures will prevent Company computers from being illegally accessed, and the data on them stolen or altered, and Company assumes no responsibility for such actions. You may request that your information be modified or deleted as detailed below.

In compliance with applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your PII.

# 7. NO INFORMATION COLLECTED FROM CHILDREN

We will never knowingly collect any PII about children under the age of eighteen (18) years old. If we obtain actual knowledge that we have collected PII about a child under the age of eighteen (18) years old, that information will be immediately deleted from our database. Because we do not collect such information, we have no such information to use or to disclose to third-parties. Company has designed this policy in order to comply with the Children's Privacy Protection Act ("COPPA").

# 8. LINKS TO OTHER WEBSITES AND THIRD-PARTY PRIVACY PRACTICES

Company may provide links to other websites for your convenience and information, and encourages third parties to adopt and post privacy policies that govern the use of your PII. Such third party use is not subject to our control and we are not responsible for the content of linked websites, or any use of such websites. Whether linked or not, you expressly acknowledge that third party websites have their own privacy statements

and personal information collection, use, and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by any/all third party websites prior to providing them with information or taking advantage of an offer or promotion.

## 9. SPECIAL NOTIFICATION FOR CALIFORNIA RESIDENTS

As a business subject to California Civil Code div 1798.83, Company must disclose, upon request, the identity of third parties to whom Company has disclosed your PII within the previous calendar year, along with the categories of personal information disclosed, for the third parties" direct marketing purposes. If you are a California resident and would like to make such a request, you may communicate your desire to do by contacting Company directly.

## California Consumers Privacy Act (CCPA) Notice

Our CCPA Privacy Notice describes the rights available to California residents under the California Consumer Protection Act (CCPA). As a California resident, if you wish to exercise your rights under the CCPA please follow the instructions found in our CCPA Privacy Notice.

#### 10. CHANGES TO THIS PRIVACY POLICY

Company reserves the right to change or remove portions of our Privacy Policy at any time without prior notification. Information will be used in accordance with the privacy policy under which the information was collected. Users will have a choice as to whether or not we use their information in this different manner. Please check the Website frequently to apprise yourself of any changes that may affect you. The posting of any changes will be the only notice that you will receive regarding any such amendments or changes.

### 11. PRIVACY INQUIRIES OR COMPLAINTS

Company strives to keep all PII accurate and complete. You are always fully in control of the information that we maintain to service you. You can change your PII at any time and as often as necessary. You can also request that PII be deleted. Information may be withheld or exempted from deletion if this is required by law or is part of a fraud investigation, or as otherwise as described above. If you have any inquiries regarding our privacy practices, believe that we have not complied with this Privacy Policy, or would like to access and modify your PII, please contact directly:

Family First Life 80 Norwich – New London Tpke. Suite 1B Uncasville, CT 06382 USA

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