

Aldersgate Life Plan Services
Website Privacy Policy

Effective Date: 01/17/2023

Aldersgate Life Plan Services (“ALPS,” “we”, “us” or “our”) respects your right to privacy. This Privacy Policy is designed to inform you about how we collect, use, and share information about you when you access or use our websites (the “Services”) and when you otherwise interact with us.

We reserve the right to change this Privacy Policy from time to time in our sole discretion. If we make changes to this Privacy Policy, we will provide notice of such changes, such as by sending an email notification, providing notice through the Services or updating the “Effective Date” date at the beginning of this Privacy Policy. We encourage you to review this Privacy Policy whenever you use or access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

1. Collection of Information – Describes the types of information we collect.
2. Use of Information – Describes the ways in which we use information.
3. Sharing of Information – Describes the ways in which we share information.
4. How We Respond to “Do Not Track” Signals – Describes how we handle browser “Do not Track” requests.
5. Analytics Services Provided By Others – Describes how we use third party analytics services.
6. Interest-Based Advertising – Describes the ways in which we conduct advertising based on your interests and activities.
7. Security – Describes our information security practices.
8. Links to Third-Party Websites – Contains a disclosure about third party services.
9. Notice to International Users – Clarifies that the data may be transferred and processed in the U.S.
10. Children’s Online Privacy Protection Act – Contains a disclosure about compliance with this Act
11. Your Choices – Describes the choices you can make regarding your account settings.
12. Contact Us – Provides contact information in the event you have any questions.

1. Collection of Information

Information You Provide To Us

We collect information you provide directly to us. For example, we collect information when you register for an account, participate in any interactive features of the Services, subscribe to a newsletter or email list, participate in a survey, contest, promotion or event, request customer support or otherwise communicate with us.

The types of information we may collect from you include:

- (a) Account Information, such as your name, email address, postal address, password, phone number and any other information you choose to provide;
- (b) Transaction Information, such as information about the events and services for which you register. We may also collect and store limited payment information from you, such as payment card type and expiration date and the last four digits of your payment card number; however, we do not collect or store full payment card numbers and all transactions are processed by our third party payment processor.
- (c) Other Information You Choose to Provide, such as when you request technical or customer support or communicate with us.

Information We Collect Automatically

When you access or use the Services, the types of information we may automatically collect about you include:

- (a) Device Information: We collect information about the device you use to access or use the Services, including the hardware model, operating system and version, mobile network information and information about your use of our Services.
- (b) Log Information: When you access or use the Services, our servers automatically record certain log file information, such as your Internet Protocol (“IP”) address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Services.
- (c) Information Collected by Cookies: We and our service providers use various tracking technologies, including cookies, to collect information about you when you interact with our Services, including information about your browsing and purchasing behavior. Cookies are small data files stored on your hard drive or in device memory

that help us improve the Services and your experience, see which areas and features of the Services are popular, and count visits. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services.

Information We Collect From Third Parties

We may also obtain information about you from other sources and combine that with information we collect directly. For example, we may collect information about you when you post content to our pages or feeds on third party social media sites

2. Use of Information

We may use information about you for various purposes, including to:

- (a) Provide, maintain and improve our Services and provide you with relevant information;
- (b) Send you technical notices, updates, security alerts and support and administrative messages;
- (c) Respond to your comments, questions and requests and provide customer service;
- (d) Facilitate contests, sweepstakes and promotions and process and deliver entries and rewards;
- (e) Monitor and analyze trends, usage and activities in connection with our Services;
- (f) Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of ALPS and others;
- (g) Communicate with you about events, products, services, offers, promotions, rewards and events offered by us and others, and provide news and information we think will be of interest to you;
- (h) Maintain appropriate records for internal administrative purposes;
- (i) Link or combine with information we get from others to help understand your needs and provide you with a better experience; and

(j) Carry out any other purpose described to you at the time the information was collected.

3. Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

- (a) With vendors, consultants and other service providers who need access to such information to carry out work or perform services on our behalf;
- (b) With third party businesses to provide you with information about products and services that may be useful to you;
- (c) In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, rule, regulation or legal process;
- (d) If we believe your actions are inconsistent with our Terms of Use or other policies, or to protect the rights, property or safety of ALPS or others;
- (e) In connection with, or during negotiations of, any merger, acquisition, sale of assets or any business, other change of control transaction or financing;
- (f) Between and among ALPS and any current or future parent, subsidiary and/or affiliated company; and
- (g) With your consent or at your direction.

We also may share aggregated or de-identified information, which cannot reasonably be used to identify you.

4. Analytics Services Provided by Others

We may work with analytics companies to help us understand how our Services are being used, such as the frequency and duration of usage. These providers may use cookies, web beacons and other technologies to collect device-specific information, such as a unique device identifier, when you use our Services. In particular, the Services may use Google Analytics to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies in web browsers by Google Analytics by clicking [here](#).

5. Interest-Based Advertising

We may also allow others to serve advertisements on our behalf across the Internet. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to deliver advertising and content targeted to your interests on the Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices.

6. How We Respond to “Do Not Track” Signals

Some web browsers have “Do Not Track” or similar features that allow you to tell each website you visit that you do not want your activities on that website tracked. At present, the Services do not respond to “Do Not Track” signals and consequently, the Services will continue to collect information about you even if your browser’s “Do Not Track” feature is activated.

7. Security

ALPS takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to or from us over the Internet.

8. Links to Third-Party Websites

We may offer you the opportunity to access third-party content, services, events or products by linking to a third-party’s website. If you click on a third-party link, you will be directed to that third-party’s website. We do not exercise control over third-party websites and are not responsible for the privacy practices of such third parties. We recommend that you check the privacy policies of third-party websites before providing your information to them. The fact that we may link to a third-party website or present a banner ad or other type of advertisement from a third party is not an endorsement, authorization, or representation of any affiliation by us with that third party, nor is it an endorsement of their privacy or information security policies or practices.

9. Notice to International Users

The Services are based in the United States and are subject to U.S. law, and are intended for users only in the U.S. We may store information on servers and equipment in other countries depending on a variety of factors, including the locations of our service providers. By accessing or using the Services or otherwise providing information to us, you consent to the processing, transfer and storage of information in and to the U.S. and other countries, where you may not have the same rights as you do under local law.

10. Children's Online Privacy Protection Act

ALPS does not knowingly collect any personal data from children.

11. Your Choices

Account Information

You may update, correct or modify information about you at any time by contacting us at info@aldersgateliving.org, but note we may continue to store information about you as allowed or required by law or for legitimate business purposes.

Your Rights

- The right to know. You have the right to know (i) the personal information that we collect about you and the purposes for which it will be used; (ii) the categories of personal information that we collected about you in the preceding 12 months; and (iii) the categories of personal information that were disclosed for business purposes in the preceding 12 months.
- The right to access. You have the right to access a copy of the personal information that we have collected about you. You may request this copy to be delivered either by mail or electronically.
- The right to deletion. You have the right to request that we delete the personal information that we or our vendors maintain about you. There may be circumstances under which we will be unable to delete your personal information, such as if we need to comply with our legal obligations or complete a transaction for which your personal information was collected. If we are unable to comply with your request for deletion, we will let you know the reason why.

- The right to opt out of the sale of your personal information. You have the right to opt out of the sale of your personal information to third parties. If you do not affirmatively opt out, and you are not a minor, your personal information may be sold as disclosed in this Privacy Policy

- The right to equal service. If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, you may be unable to use or access certain features of the Services.

To exercise any of these rights, contact us at info@aldersgateliving.org

Promotional Communications

You may opt out of receiving promotional communications from us by following the instructions in those communications or by emailing us at info@aldersgateliving.org. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services.

12. Contact Us

If you have any questions about this Privacy Policy, please contact us at info@aldersgateliving.org.