

# Privacy Policy

Captive Synergy LLC ("Captive Synergy LLC" "We", "Us") is sensitive to your concerns about how we use the personal information we collect from you and about you. Captive Synergy LLC takes your privacy seriously and has implemented this privacy policy (the "Privacy Policy") and internal policies and practices to keep your personal and financial information secure. The Privacy Policy covers Captive Synergy LLC's treatment of the Personally Identifiable Information we collect about you. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information. This Privacy Policy is incorporated into our Terms of Use and Terms of Service, and therefore governs your use of the Online Services. By using Captive Synergy LLC Online Services, you accept the terms of this Privacy Policy. If you have questions or concerns about the Privacy Policy, please contact Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com).

## What Information Do We Collect About Our Customers?

**Traffic Data.** Captive Synergy LLC may collect a variety of visitor data such as IP addresses, browser settings, internet service provider (ISP) information, referring/exit pages, operating systems, date/time stamps, and clickstream data (collectively "Visitor Data"). The Captive Synergy LLC internal servers and software automatically recognize Visitor Data. Captive Synergy LLC's website (the "Site") may use Visitor Data to compile traffic data about the types of visitors who use the Site at specific intervals (collectively "Traffic Data").

We may use Traffic Data to analyze Site traffic, but this information is not examined for Personally Identifiable Information. We may also use Traffic Data to diagnose problems with our server, administer our Site, or display content according to your preferences. Visitor Data and Traffic Data may also be shared with business partners, affiliates, or advertisers on an aggregated and anonymous basis.

## Cookies and Similar Technologies.

Captive Synergy LLC and its partners may use the standard cookie feature of major browser applications and third-party providers, including Google Analytics features (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration and Google Analytics Demographics and Interest Reporting), or employ internally developed cookies and tracking codes, that allow Captive Synergy LLC to store a small piece of data on a visitor's computer, or any other device a visitor uses to access Online Services, about his or her visit to the Site or use of other plug-ins exchanging information with Captive Synergy LLC ("Applications"). (The Site and Applications are sometimes collectively referred to as "Online Services" for simplicity.) Similar technologies, such as java scripts or etags, are also used to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can remove persistent cookies by following directions provided in your Internet browser's "help" directory. If you reject cookies, you may still use our site, but your ability to use some areas of our site, such order forms, will be limited.

To manage Flash cookies, please click here: [www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

## Web Beacons.

We may employ a software technology called clear gifs (a.k.a. web beacons), that might help us track referrals from our partners and affiliates and better manage content on our site. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We might not tie the information gathered by clear gifs to our customers' Personally Identifiable Information.

## 3rd Party Tracking.

The use of tracking technologies by our service providers, technology partners or other 3rd party assets (such as social media links) on the site is not covered by our Privacy Policy. These 3rd parties may use cookies, clear gifs, images, and scripts to help them better manage their content on our site. We do not have access or control over these technologies. We do not tie the information gathered to our Customers' or Users' Personally Identifiable Information.

## Personal Information.

Captive Synergy LLC requires each customer to provide us with personal information (collectively "Personally Identifiable Information") to access and use Captive Synergy LLC products and services. Personally Identifiable Information is captured when a visitor accesses Online Services or speaks on the phone with a Captive Synergy LLC employee, and willingly discloses that information. This disclosure may occur when a visitor registers with an Online Service, engages in transactions, contacts customer service, or participates in contests, promotions, surveys, forums, content submissions, requests for suggestions, or other aspects of services offered by Captive Synergy LLC.

## Personally Identifiable Information includes but is not limited to:

(i) "Contact Data" (such as your name, address, city, state, zip code, phone number, and email address); (ii) "Financial Data" (such as your credit card number, expiration date, and verification code or bank account information); (iii) "Demographic Data" (such as your zip code and sex); and (iv) other "Legal

Data" (such as your social security number, EIN number, mortgage information, automobile information, marital information, trade secrets, inventions, and idea submissions and other sensitive information necessary to generate legal documents).

We may also receive information about our customers or potential customers from other sources, including employers who have purchased our products on behalf of their employees. In some instances, we may combine this data with information we already have or that we later receive from our customers. This helps us to update, expand and analyze our records and to provide better service to customers. We will only use this information for the specific reasons that it was provided to us, which may include marketing related uses. Examples of the types of Personally Identifiable Information that we may receive from third parties include Contact Data and Legal Data.

We may collect the information of 3rd party individuals as necessary, such as to ask our customers to indicate beneficiaries of a will, record shareholders of a company, or register authorized contacts to access their Captive Synergy LLC account. Captive Synergy LLC uses this information for the sole purpose of administering its services for our customers and does not use such information for any other reason.

If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com).

Certain personal information becomes public record when documents are filed with the federal or state government, or with a court. For example, a corporation's name, business address, and registered agent name become public information when its articles of incorporation are filed. A Secretary of State may publish this information to its website or provide this information to third parties for a fee. The U.S. Patent and Trademark Office publishes the names and addresses of trademark registrants. In some states, fictitious business names, including the name and address of the business owner, must be published in a newspaper. The Captive Synergy LLC Privacy Policy does not cover these or similar third-party actions.

#### **Testimonials and Reviews.**

We display personal testimonials of satisfied customers received through email surveys. We ask for your specific consent as part of the survey. If you wish to update or delete your testimonial, you can contact us at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com). We also display customer reviews. If you provide a review that we display and wish to update or delete it, you can also contact us at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com).

#### **Calls/Electronic Communications.**

In the regular course of our business, Captive Synergy LLC may monitor and record phone conversations or email communications between you and Captive Synergy LLC employees for training and quality assurance purposes. We may receive a confirmation when you open or click on content in an email from us, which helps us make our communications to you more useful and interesting. If you do not wish to receive email from Captive Synergy LLC, you may unsubscribe from our mailing list by using the "Unsubscribe" link on any of the emails we send.

#### **How Do We Use the Information We Collect and Do We Share the Information We Receive?**

We use information we collect to communicate with you, process your orders, facilitate your transactions with our third-party marketing partners, for research into how to improve our product offerings, and inform you of offers and discounts. For example, you may receive a welcome email that confirms your username and password, and later receive communications responding to your inquiries, providing services you request, and managing your account. We occasionally send service-related announcements, for example, to alert you if we need to temporarily suspend the Site for maintenance.

#### **Opting Out.**

We send promotional emails and newsletters from time to time to users who have registered on the site and to those who have opted in to receive such emails. Generally, you may not opt-out of service-related or transactional communications, which are not promotional. If you do not wish to receive service-related communications, you may terminate your account by contacting Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (1) 214-872-7800. However, you can opt-out of promotional communications by using the "Unsubscribe" link and following the unsubscribe instructions in any electronic communication or by emailing us at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com).

You may choose not to provide Captive Synergy LLC with Personally Identifiable Information or you may turn off cookies in your browser by changing its settings. If you make these decisions, you may continue to use the Online Services and browse its pages. However, Captive Synergy LLC cannot process orders without Personally Identifiable Information.

#### **Surveys, Sweepstakes, and Contests.**

We may provide you the opportunity to participate in surveys on our site, to measure customer satisfaction. If you participate, we may request certain personally identifiable information from you. Participation in these surveys, sweepstakes, or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes name, email address, and mailing address.

We use this information to notify contest winners and award prizes, to monitor site traffic or personalize the site, and/or to send participants an email newsletter.

We may use a third-party service provider to conduct these surveys or contests; that company will be prohibited from using our users' personal information for any other purpose. We will not share the personal information you provide through a contest or survey with other third parties unless we give you prior notice and choice.

**We share customer information with third parties only as follows:**

**Order Processing.**

Captive Synergy LLC, sometimes with the assistance of a third party or Captive Synergy LLC subsidiary, may use your Personally Identifiable Information to process your payment through merchant account services, and to generate the products and services you order. Your Contact Data may be used to follow up with you on transactions you initiate, respond to inquiries, inform you of changes to Online Services, and send you additional information about Captive Synergy LLC and its products and services.

**Registered Agent Requests.**

If you designate a person or company other than Captive Synergy LLC to serve as the registered agent for your business entity, Captive Synergy LLC may provide your name and contact information to that party, if the designee requests.

**Third Party Marketing.**

Unless specifically authorized by you, we do not provide Personally Identifiable Information to third parties for their marketing purposes. If you express interest in a third-party offer, we may provide your Personally Identifiable Information to that third party solely in connection with the offer you have selected. In addition to sharing your Contact Data, we may also share details regarding your purchase from Captive Synergy LLC, as well as your Financial, Demographic, or Legal Data with these third parties. If you later decide to opt-out from allowing Captive Synergy LLC to share your Personally Identifiable Information with third parties for their marketing purposes, you may do so by contacting Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (1) 214-872-7800. To the extent that Captive Synergy LLC has already shared your Personally Identifiable Information with third parties for their marketing purposes prior to your decision to opt-out, you may opt out from future marketing by contacting the Third Parties directly.

**Required by Law.**

We may also disclose your personal information: as required by law, such as in response to a subpoena, a lawful request by a public authority, including to meet national security or law enforcement requirements, or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a legal request.

**Visitor Demographics.**

Contact Data and Traffic Data are used to gather general statistics about our customers and visitors. We may use Demographic Data to generate collective information about our users, but not in a way that identifies any user specifically. For example, we may inform third parties about the number of registered users and unique visitors, and the pages most frequently browsed.

**Legal Plan Attorneys and Attorney-Assisted Products.**

As a convenience to you and your attorney, we may share your Personally Identifiable Information, information about your order, and your order history with your legal plan attorneys and with attorneys who service our attorney-assisted products. We will notify you prior to sharing this information and, where the information is not necessary to complete your order, give you the opportunity to opt-out.

**Service Providers.**

We may share your Personally Identifiable Information with companies that provide support services to us (such as a printer or email service provider), help us market our products and services, or for training purposes. These companies may need information about you in order to perform their functions. These companies are not authorized to use the information we share with them for any other purpose.

**Business Partners.**

When you purchase a product from us that is bundled with a product offered by one of our business partners, we will share your Personally Identifiable Information with those business partners so that they can provide you with the product or services included with your purchase. These companies are not authorized to use the information we share with them about you for their own marketing purposes without first asking for your permission.

**Partner and Affiliate Tracking.** Our partners and affiliates, including Google Analytics (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics and Interest Reporting), may use cookies and web beacons to collect non-personally identifiable information about your activities on this and other websites to provide you targeted advertising based upon your interests. This means that these partners and affiliates may show our ads on sites across the Internet based upon your previous visits to our site. Together with our partners and

affiliates, we may use these cookies and web beacons to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to your visits to our site.

If you would like to learn more or opt out of receiving online display advertising tailored to your interests, please visit the Networking Advertising Initiative at [www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) or the Digital Advertising Alliance at <http://aboutads.info/choices>. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking here. Please note this does not opt you out of being served advertising. You will continue to receive generic ads. If you delete your cookies, use a different browser, or buy a new computer, you will need to renew your online display advertising opt-out choice. You may also visit Google Analytics' Ads Settings to opt out of Google's use of cookies and customize Google Display Network ads, and Google Analytics' opt Out Browser Add-on for the web.

#### **Blogs and Forums.**

The Site includes a publicly accessible blog and interactive forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. You should use caution when deciding whether to disclose your personal information in these areas of the site. To request removal of your personal information from our community forums, contact us at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

#### **Other Transfers.**

We may share Personally Identifiable Information and other data with businesses controlling, controlled by, or under common control with Captive Synergy LLC. If Captive Synergy LLC is merged, acquired, or sold, or if some or all of our assets or equity are transferred, we may disclose or transfer Personally Identifiable Information and other data in connection with the associated transactions.

#### **Bankruptcy.**

In the event of a Captive Synergy LLC bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used. If such an event occurs, your Personally Identifiable Information may be treated like any other Captive Synergy LLC asset and sold, transferred, or shared with third parties, or used in ways not contemplated or permitted under this Privacy Policy. In this case, you will be notified via email and/or a prominent notice on our site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

#### **Links**

##### **Third-Party Websites.**

Captive Synergy LLC may maintain links to other websites and other websites may maintain links to the Online Services. This Privacy Policy applies only to Captive Synergy LLC.com and not to other websites accessible from Captive Synergy LLC or that you use to access Captive Synergy LLC, each of which may have privacy policies materially different from this Privacy Policy. If you visit other websites, Captive Synergy LLC is not responsible for the privacy practices or content of those sites. It is your responsibility to review the privacy policies of non-Captive Synergy LLC websites to confirm that you understand and agree with them.

**Social Media Widgets.** Our website includes social media features, such as the Facebook "like" button and widgets, such as the "Share this" button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

##### **Accessing and Changing Your Account**

Upon request Captive Synergy LLC will provide you with information about whether we hold any of your personal information. In certain circumstances we may be required by law to retain your personal information or may need to retain your personal information in order to continue providing a service. Please review the information below to access, correct, or request deletion of your personal information.

#### **User and Authorized Contact Access to Order Information.**

Captive Synergy LLC will give you, or anyone listed as an authorized contact for your account, information about your order. This may include information about the nature and status of your order, information you provided to process your order, payment information, and contact information. If you want someone to have access to your order, you must list them as an authorized contact or they may not obtain information. You can confirm who is listed as an authorized contact for your account, add new authorized contacts, or remove authorized contacts by clicking first on "My Account", and then on "Account Information". We may send a confirmation email to your authorized contact(s), alerting them that they have been added as an authorized contact. For some products, we may provide information about your order to other individuals named in the order, such as executors named in a last will. For product-specific information about who may request information about your order, please contact Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (1)214-872-7800.

### **User Access to and Ability to Update Personally Identifiable Information.**

You may visit your personal account profile at any time by clicking on the "My Account" link, which will take you to the following URL: [www.Captive Synergy LLC.com/welcome/signin.asp](http://www.Captive Synergy LLC.com/welcome/signin.asp). Through My Account, you may: (i) review and update your Contact Data; (ii) complete pending orders; and (iii) begin new orders. If you no longer desire our services, or if you want to remove your Personally Identifiable Information from our Site, you may terminate your account by contacting Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (800) 773-0888. We will respond to your request within 30 days.

### **Data Retention.**

At minimum, we will retain your information for as long as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Captive Synergy LLC may maintain some or all of this data in its archives even after it has been removed from the Site.

### **Information Processed on Behalf of Third Parties**

In some instances, Captive Synergy LLC may process Personally Identifiable Information on behalf of third-party affiliates. Captive Synergy LLC acknowledges that in these instances, you have the right to access your personal information. Where Captive Synergy LLC has no direct relationship with the individuals whose personal data it processes, individuals seeking access, or seeking to correct, amend, or delete inaccurate data, should direct their inquiry to the third-party affiliate (the data controller). If requested to remove the data, we will respond within a reasonable timeframe.

### **How Secure Is the Personal Information We Collect?**

**Our Commitment to Data Security.** We strive to make certain that our servers and connections incorporate the latest encryption and security devices. We have implemented physical, electronic, and managerial procedures to safeguard and secure the information we collect. Credit card and personal information are transmitted by secure servers (SSL). Documents are delivered to you via UPS or similar overnight delivery services, the United States Postal Service, or email. Unfortunately, no data transmission is guaranteed to be 100% secure and we therefore cannot guarantee the security of information you transmit to or from the Site, Applications, or through the use of our services, and you provide this information at your own risk. ACCORDINGLY, WE DISCLAIM LIABILITY FOR THE THEFT, LOSS, OR INTERCEPTION OF, OR UNAUTHORIZED ACCESS OR DAMAGE TO, YOUR DATA OR COMMUNICATIONS BY USING THE SITE, APPLICATIONS, AND OUR SERVICES. YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND ASSUME THESE RISKS.

IF YOU BELIEVE YOUR PRIVACY HAS BEEN BREACHED THROUGH USE OF OUR WEBSITE, APPLICATIONS, OR OTHER SERVICES PLEASE CONTACT US IMMEDIATELY AT (1)214-872-7800.

**Enforcement.** We periodically review this Privacy Policy and our compliance with it to verify that both are accurate. We encourage you to contact us with any concerns, and we will investigate and attempt to resolve any complaints and disputes about our privacy practices.

**Changes to this Policy.** We may update this privacy policy to reflect changes to our information practices. If we make any material changes a notice will be posted on this page along with the updated Privacy Policy prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

**Contact Us.** If you have any questions regarding our Privacy Policy, please contact us on the information below.

[admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (1) 214-872-7800

### **Information for EU Customers and Visitors**

If you are located in the EU, this section provides information regarding your rights, and Captive Synergy LLC's responsibilities, regarding the processing of your personal data.

**EU User Rights.** If you are located in the EU, you have the following rights with respect to how Captive Synergy LLC processes your personal data.

- (1) You have the right to request a copy of the personal data that Captive Synergy LLC has about you;
- (2) You have the right to request that Captive Synergy LLC corrects the information about you if you believe it to be inaccurate;
- (3) You have the right to request that Captive Synergy LLC erase or refrain from using your personal data. This is not an absolute right and, in some circumstances, Captive Synergy LLC may decline to erase or limit its usage of your data, such as when Captive Synergy LLC has an on-going business

relationship with you or we are legally required to retain the information. If Captive Synergy LLC cannot honor your request, Captive Synergy LLC will inform you of this fact as well as the reasons for Captive Synergy LLC's decision;

To exercise any of these rights, please contact Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (1)214-872-7800.

If you are located in the EU or outside of the United States of America, you DO NOT have the right to raise any objections regarding the processing of your personal data and to raise any concerns you may have about Captive Synergy LLC's processing of your personal data. You may however contact Customer Care at [admin@captivesynergyllc.com](mailto:admin@captivesynergyllc.com) or (1)214-872-7800.

While we hope that Captive Synergy LLC can resolve any of your privacy concerns to your satisfaction after you contact us directly, you also by using this website and any of our services waive and forego any legal right to file a complaint regarding Captive Synergy LLC's handling of your personal data.

EU-U.S. Privacy Shield. Captive Synergy LLC.com does not participate in or comply with the EU-U.S. Privacy Shield Framework (the "Framework"). Captive Synergy LLC does attempt to subject all personal data received from European Union (EU) member countries, to the Framework's applicable Principles. This specifically refers to all EU personal data received by Captive Synergy LLC's U.S. websites. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List.

Captive Synergy LLC processes personal data it receives and subsequently transfers it to a third party acting as an agent on its behalf. Captive Synergy LLC attempts to duplicate the Privacy Shield Principles for all onward transfers of personal data from the EU, excluding the onward transfer liability provisions.

#### **Privacy Policy Revision History**

Last updated on November 28, 2018