

Richard G. Stewart Privacy Policy (“Privacy Policy”)

Effective Date: January 28, 2016

Richard G. Stewart, Jr., its affiliates, owner(s), and partners (collectively “richardgstewart.com”) is committed to the protection of your privacy. This Privacy Policy applies to data collected by richardgstewart.com through its website www.richardgstewart.com, other websites owned and operated by richardgstewart.com, its affiliates (collectively, the “Website”), its mobile applications, or for any services available on the Website, apps or otherwise offered by richardgstewart.com (collectively, the “Services”).

To fully understand your rights related to privacy issues, we encourage you to read this Privacy Policy and to consult the terms of any other agreement you have made with richardgstewart.com as well as the program policies associated with our Services. As our Services evolve, we may from time to time amend this Privacy Policy. Please revisit it periodically and, if you have questions regarding either this Privacy Policy or any other agreement made with richardgstewart.com, contact us at the provided address herein. Please note that this Privacy Policy applies only to Services owned and operated by richardgstewart.com, and not to the sites of other companies or organizations to which we may provide links.

By using any of our Services, you signify that you have read, understand, and agree to be bound by this Privacy Policy as well as our program policies and any other terms and conditions to which you have previously agreed, which are incorporated herein by reference.

What information do we collect?

We may ask you to provide personal information, such as your e-mail address, name, home or work address, or telephone number. We may also collect demographic information, such as your ZIP code, age, gender, preferences, interests, and favorites. If you choose to make a purchase, we may ask for additional information, such as your credit card number and billing address, which will be used to create a billing account.

This "Personal Information" refers to any information that lets us know the specifics of who you are and which can be used to identify, contact, or locate you. Generally, we collect this Personal Information when you provide it to us by signing up for our Services. We usually collect this Personal Information so that we can provide you with our goods or services. We may also use your Personal Information for other reasons, many of which are disclosed in this Privacy Policy including updating you on our Services, news, and/or special offers (unless you choose to "opt-out" as described in the "Choice/Optout" section below). If you don't provide some of the Personal Information we ask for (e.g., your name, your mailing address, and/or email address), we may be unable to provide you with our goods or services.

To access some Services, you will be asked to sign in with a username and password, which we refer to as your “credentials”. As part of creating your credentials, you may also be requested to provide questions and secret answers, which we use to help verify your identity and assist in resetting your password, as well as an alternate e-mail address.

We may use our, and possibly even third-party, analytics tools to collect certain information, and some non-personal data, about your interaction with our Services within an Internet or mobile site or application, including: your location/GPS coordinates (only if you enable this feature); your device properties, make and model, height and width, and volume; IP address (if using a browser), Media Access Control (“MAC”) address and unique device identifier or other device identifier (“UDID”); your device software platform and firmware; the site you came from, the search engine(s) and the keywords you used to find our Website, the pages you view within our Website, and your browser add-ons; who the mobile phone carrier is; your geographical data, like zip code, area code, time zone and city, state-level location information; activities and page views within our mobile app; and other non-personal data as reasonably required by us to enhance the Services. This information is not treated as personal information unless we combine it with or link it to any of the personally identifiable information mentioned above. We may also use technologies such as cookies to collect information about the pages you view, the links clicked, and other actions taken on our Services.

We may also deliver advertisements (see the Display of Advertising section below) and/or provide analytics tools on non-richardgstewart.com websites and services, and we may collect information about page views on these third party sites as well.

The email address you provide for order processing will only be used to send you information and updates pertaining to your order. If you receive newsletters or promotional e-mail from richardgstewart.com, we may use customized links or

similar technologies to determine whether the e-mail has been opened and which links you click to provide you more focused email communications or other information.

To offer a more consistent and personalized experience in your interactions, information collected through our Services may be combined with information obtained through other services. We may also supplement the information we collect with that obtained from other companies. For example, we may use services from other companies to enable us to derive a general geographic area based on your IP address to customize certain Services to your area.

Anonymous User Information

We collect or may collect some information each time you visit so we can improve the overall quality of your online experience. We may collect your IP address, referral data, and browser and platform type. You do not have to register or provide any Personal Information to us before we can collect this anonymous user information. Like most standard website servers, we use log files to collect and store this anonymous user information. We may analyze the information to determine trends, administer the site, track users' movement in the aggregate, and gather broad demographic information for aggregate use.

What do we use your information for?

Except as described herein or in other agreements with richardgstewart.com, we currently do not rent, sell, or share Personal Information with other people or non- richardgstewart.com affiliated companies except: when we have your consent to do so, when necessary to complete a transaction you have requested, when required by law, or when necessary to protect our rights or property. Although we currently do not rent, sell, or share Personal Information about you with other people or non- richardgstewart.com affiliated companies, we expressly reserve the right to do so in the future. We may use, or supply to others, aggregated data (independent of any personal identifiers) for research and commercial purposes, such as describing our Services to richardgstewart.com participants, to prospective partners, advertisers, or other third parties. Such data is pooled and stripped of personal identifying information and cannot be traced to you specifically. Specific uses of Personal Information that vary from this Privacy Policy may be found in the agreements you have with RGS.COM.

We may share your Personal Information with select richardgstewart.com partners so that they can contact you about their products, services, or offers or in conjunction with services provided.

Some of our Services may be co-branded and offered in conjunction with another company. If you register for or use such Services, both richardgstewart.com and the other company may receive information collected in conjunction with the co-branded services.

We occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of mailings, providing customer support, hosting websites, processing transactions, or performing statistical analysis of our services. Those service providers will be permitted to obtain only the Personal Information they need to deliver the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose. However, for credit card processing, our fraud detection vendors may use aggregate data to help improve their service. This helps them more accurately detect fraudulent uses of credit cards. We may access or disclose information about you, including the content of your communications, in order to: (a) comply with the law or respond to lawful requests or legal process; (b) protect the rights or property of richardgstewart.com or our customers, including the enforcement of our agreements or policies governing your use of the Services; or (c) act on a good faith belief that such access or disclosure is necessary to protect the personal safety of richardgstewart.com employees, customers, or the public. We may also disclose Personal Information as part of a corporate transaction such as a merger or sale of assets.

Transactional Data

"Transactional Data" shall mean all data obtained by us in connection with any transaction that is tracked by us but which shall not include your Personal Information. We have the right to sell, transfer, assign, and dispose of any and all Transactional Data, in any manner that we desire at our sole and absolute discretion.

Security

richardgstewart.com is committed to protecting the security of your Personal Information and information collected for advertising purposes. We use various security technologies and procedures to help protect your Personal Information from unauthorized access or disclosure. To prevent unauthorized access or disclosure, we have put in place industry-standard

physical, electronic, and managerial procedures to safeguard and secure the information we collect online. However, users should be aware our security measures are run on software, hardware, and networks that may, from time to time, require maintenance, experience problems or breaches of security beyond our control. As such, transmissions made on or through the Internet are vulnerable to attack and cannot be guaranteed to be secure. You hereby acknowledge that richardgstewart.com is not responsible for any intercepted information sent via the internet, and you hereby release richardgstewart.com from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

Although richardgstewart.com houses its data in the United States, it is possible that some of data processing may occur outside the United States. While the data protection laws of these countries may vary, richardgstewart.com will make every reasonable effort to protect your information based upon the express terms of this Privacy Policy. By enrolling in the Service, you consent to this transfer of your personal data to any server used by richardgstewart.com.

If a password is used to help protect your accounts and Personal Information, it is your responsibility to keep your password confidential. Do not share this information with anyone. If you are sharing a computer with anyone, you should always log out before leaving a site or service to protect access to your information from subsequent users.

Do we use cookies?

Yes - A cookie is a data file sent to your browser and is stored on your computer's hard drive when you visit a website. A cookie assigns a random, unique number to your computer. One of the primary purposes of cookies is to store your preferences and other information on your computer to save you time by eliminating the need to repeatedly enter the same information.

We use "cookies" to track and store your preferences to personalize our site for you, estimate our audience size, and generally improve your richardgstewart.com experience. Cookies may also make your experience easier by allowing you to move from page to page within the Website without having to sign in again on each page. richardgstewart.com does not use cookies to retrieve any information from your hard drive. You can reject cookies by turning them off in your browser. If you choose to accept cookies, you also have the ability to later delete cookies that you have accepted. If you choose to delete cookies, any settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated, and such possibly diminishing your richardgstewart.com experience.

Third Party Links and Advertisements

Our Services may contain links to other sites on the Web. Please be aware we are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our Services to read the privacy statements of each and every other website or service that collects personally identifiable information. This Privacy Policy applies solely to information collected by us. By using our Services, you agree to hold richardgstewart.com harmless for the privacy policies or practices of others, including but not limited to richardgstewart.com participants.

richardgstewart.com may allow other companies, called third party ad servers or ad networks, to display advertisements on our Services or in emails to you. Some of these ad networks may place a persistent cookie on your computer. RGS.COM does not have access to or control over the cookies that may be placed by these parties on your computer, and has no control over these parties' privacy policies or information collection practices.

Except as specifically set forth in this Privacy Policy, richardgstewart.com does not provide your Personal Information to its advertisers unless you make the choice to share it with them. However, richardgstewart.com occasionally passes personally identifiable information via a secure interface to certain of its advertisers or benefits providers for the purpose of making it easier for you to sign up for or use their offers or benefits.

richardgstewart.com may also disclose your Personal Information to third parties where it has your express permission to do so, or where it can reasonably be inferred from the circumstances that you consent to the disclosure to the third parties. We try to limit the information we provide to third parties to the information they need to help us provide the Services to you.

richardgstewart.com may need to validate your transaction with an advertiser or merchant participants to ensure that your account is credited. The validation information shared is used solely for this purpose and may include your first name, last name, email address, mailing address, date of birth, or other details related to your membership of transaction.

richardgstewart.com may share non-personally identifiable information collected via the Services in anonymous form with advertisers or other third parties so that they may better evaluate what products and services are most appealing to different segments of the richardgstewart.com user base.

Display of Advertising

We may display ads on our Services and sites of our advertising partners. When we display online advertisements, we will place persistent cookies on your computer to recognize your computer each time we display an ad. We are able to compile information over time about where you, or others who are using your computer, saw and/or clicked on advertisements we display. We use this information to make predictions about your characteristics, interests, or preferences and to display targeted advertisements we believe may be of interest to you. We may also associate this data with your subsequent visit, purchase, or other activity on participating advertisers' websites to determine the effectiveness of the advertisements.

While we may use some of the information we collect to personalize the ads we show you, we designed our systems to select ads based only on data that does not personally and directly identify you. For example, we may select the ads we display according to certain general interest categories or segments that we have inferred based on: (a) demographic or interest data, including any you may have provided when creating an account (e.g., age, zip or postal code, gender), demographic or interest data acquired from other companies, and a general geographic location derived from your IP address, (b) the pages you view and links you click when using the Services, and (c) information about the users you most frequently interact with through our communications or social networking services.

We may also display personalized targeted ads to you and allow third-party ad serving companies, including other ad networks, to display advertisements on our Website. These companies may offer you a way to opt-out of ad targeting based on their cookies.

Accessing Your Account / Choice/Opt-Out

Our goal is to keep you in control of the Personal Information you provide to us. Accordingly, you can review, correct, or change any registration information you provide to richardgstewart.com through your member, merchant, or nonprofit dashboard, as applicable. To "opt-out" and elect not to receive marketing communications from us, please email us at info@helpwww.com. The choice to halt such emails does not apply to the display of online advertising.

Please note as long as you remain a participant in richardgstewart.com, opting not to receive marketing emails does not exempt you from receiving administrative emails, which include, but are not limited to, notices about vital service and status changes or alterations to this Privacy Policy or the richardgstewart.com program policies. You may not withdraw this consent at any time if you are subject to legal or contractual restrictions. In other words, you may not withdraw your consent prior to the expiration of your richardgstewart.com membership or any other contractually agreed-upon commitment for the duration of your participation in richardgstewart.com.

You can access and update your profile by logging in to your administration dashboard at our Website and editing your profile.

Children's Online Privacy Protection Act Compliance

In response to concerns about protecting children's privacy online, Congress enacted the Children's Online Privacy Protection Act of 1998 ("COPPA"), which sets forth rules and procedures governing the ways in which websites may collect, use and disclose any Personal Information for children under the age of 13. In accordance with the Company policy and COPPA regulations, we DO NOT:

1. Request or knowingly collect personally identifiable information online or offline contact information from users under 13 years of age; or
2. Knowingly use or share Personal Information from users under 13 years of age with third parties.

We request that children under the age of 13 not submit any Personal Information to us via the Services. It is possible that by fraud or deception we may receive information given to us or pertaining to children under 13. If we are notified of this, as soon as we verify the information, we will immediately delete the information from our servers.

Online Privacy Policy Only

This online privacy policy applies to information collected through our Services and not to information collected offline.

How We Respond to 'Do Not Track' Signals

In compliance with COPPA, we are notifying you we do not respond to Do Not Track signals sent to us by web browsers.

Notification of Changes

We do reserve the right to make changes to this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will post those changes in places on our Services deemed appropriate by us so our users are always aware of what information we collect, how we may use it, and under what circumstances we may disclose it. Your continued use of our Services after the changes are posted constitutes your agreement to the changes. If you do not agree to the changes, please discontinue your use of all our Services.

Correspondence

If any questions regarding the Privacy Policy, please send an email to: infor@helpww.com. If you contact richardgstewart.com, we may keep a record of that correspondence, and we may collect your email address for archival purposes, but will not use, transfer, or sell your email address except as set forth in this Privacy Policy.