

Privacy Policy

Updated January 27, 2014

DeSimone Blue Chip Planning, L.L.C. (the “Company” or “We”) operates a web site (“Site”) found at bluechipplan.com and is committed to protecting the privacy of our Site users (“Users”) and Site members (“Members”). The Company also collects information from persons (“Clients”) who solicit our financial planning and health-related services (“Services”). We offer this Privacy Policy to inform our Users, Members and Clients (referred to individually, or collectively, as “you”) of how we collect, use and disclose your personal information. The Company will take reasonable steps to protect your personal information in accordance with this Privacy Policy and all applicable laws. To make this notice easy to find, we provide a link to our policy at the bottom of most pages of our Site.

What is Personal Information?

The Company defines personal information as information about an individual that enables someone to identify or contact a person and includes, among other things, a person’s full name, address, telephone number and e-mail address, as well as other information we maintain about a person in identifiable form in combination with one of the foregoing identifiers, such as account history, financial information, health-related information, plans purchased or categories of products purchased. Categories of personal information that we collect include, for example:

- Basic identifying information such as e-mail address and first and last names
- Security information such as password, secret question and answer
- Contact information such as address and phone number
- Specific financial and health-related information, including but not limited to, goals, beneficiary names, type of work, income, and/or net worth
- Account information such as membership number, names of others allowed to use your account
- Billing information, if applicable, such as credit card, expiration date, billing address and account history
- Site preferences
- E-newsletter selections and preferences
- Complaints, questions and information submitted to customer service agents or similar individuals either in person, by phone, by e-mail or by entry on a Site
- Site behavior such as pages visited or searches requested
- Browser information such as browser version, connection speed, IP address and the presence of various related plug-ins and tools such as media players

The above list is not intended to be an exhaustive list of all of the information, data or documentation that the Company may collect about you.

When Does the Company Collect Personal Information?

The Company's goal is to provide comprehensive information to you related to financial planning and health-related services.

The Company collects personal information from you when you voluntarily submit that information to the Company, for example: when you inquire about the financial planning and health-related services of the Company; when you purchase products or services from the Company; when you apply for Site membership; register on the Site; sign up for a subscription service provided by the Company; register for the Company's e-newsletter; participate in one of the Company's surveys; respond to an offer; or request to be on a mailing list.

If you have registered your e-mail address on the Site and if you have clicked "Remember Me" or signed in to the Site, the Company collects Site behavior and browser information as you navigate through the Site. This information may be used to create a profile that we keep on you that details their preferences, personal information and behavior. Consequently, collected information is tied to your personally identifiable information and may be used to provide offers and improve the content of the Site for you. This profile may also be used to tailor your visit to our Site and to direct pertinent marketing promotions to you.

The Company may also collect personal information from other sources. For example, we may purchase third party marketing data and add it to our existing databases of information to better target our advertising and provide pertinent offers we think you would be interested in. We use this information to enhance or overlay the 'profile' of individual Users, Members and/or Clients. This aggregate marketing data is therefore tied to your personally identifiable information.

What Happens When I Register On The Site?

In order to use certain features of this Site, a User must first complete a registration process. During registration, a User is required to provide basic contact information (such as name and e-mail address) and establish a password. Depending on the feature being used, the User may be required to provide other information associated with the use of that particular feature. For example, a User signing up for our subscription service will be required to provide an address to which donation payments will be mailed and financial information in the form of a credit card or check card number and expiration date for billing purposes.

Does the Company Use Cookie Technology?

The Company may use cookie technology to make your use of the Site are more convenient and to support our internal business purposes. A cookie is a piece of information that is transferred to your hard drive for record-keeping purposes. For example, the Company may use cookies to remember your e-mail address so that you will not have to re-enter this information each time you visit the Site. The Company may also use cookies to help track referrals from third party sites. Most browsers are initially set up to accept cookies, but you can set up your browser to alert you every time a cookie is offered, letting you decide whether to accept it. You can use and visit the Site with cookies disabled, but you will not automatically be recognized by the Site upon re-visiting. However, cookies allow you to take full advantage of some of our Site's best features, so we recommend that you decide if you want to use cookies or not.

Some of our business partners use cookies on our Site (for example, advertising partners). However, we have no access to or control over these cookies, once we have given permission for them to set cookies.

How Does the Company Handle Information from Children?

Please note that the Company has no intention of collecting personal information from individuals under the age of 13 (“Children”). We are committed to protecting children’s privacy on the Internet and we intend to comply fully with the Children’s Online Privacy Protection Act (COPPA). Where appropriate, we will instruct children not to provide such information to us. If a parent becomes aware that a child has provided us with personal information, we ask that the parent or legal guardian of the child contact us by visiting bluechipplan.com/contact, selecting ‘Contact Us’ and request that this information be deleted from our records.

Will I Be Contacted by the Company?

You may receive products and communications associated with your transactions with The Company, such as subscriptions or surveys. You may also receive communications from the Company related to transactions that appear to be from you or which appear to be fraudulent. You may be contacted in regards to an issue on your account or in response to a customer service contact by you or in response to a specific request from you such as clicking on a “forgot my password” link. Users who sign up for e-newsletter subscriptions will receive e-mails in accordance with their selection and preferences. These communications also may be accompanied by information about products and services, special offers and upcoming promotions or events offered by the Company, our subsidiaries, our licensees or our marketing partners that we think may be of interest to you (“direct marketing”). You also may periodically receive from the Company, our subsidiaries, our licensees or our marketing partners, unsolicited direct marketing communications by mail (delivered via the United States Postal Service).

How Can I Opt Out of Receiving Direct Marketing from the Company?

By providing us with your personal information, you consent to our collection, use and disclosure of that information as described in this Privacy Policy as amended from time to time or as described at or before the time of collection, use or disclosure, as the case may be. The Company is the owner of the personal information collected on our Site. **If you do not want your personal information to be collected, used or disclosed in this manner, please do not submit your personal information to us.**

If you would prefer that the Company not use your personal information for standalone direct marketing communications, subject to legal or contractual restrictions and legal notice you may opt out of such uses and/or disclosures by requesting via e-mail communication. Once you have opted out, your subsequent registration for our direct marketing services and promotions like our e-newsletter, or our sweepstakes and contests may void, temporarily or permanently, your prior elections to opt out of receiving direct marketing communications from the Company. Please consult the applicable rules of the promotion or service before participating. Note that when you elect to opt out we do not delete your personal information.

E-mails the Company sends to you as a result of you performing a business transaction with us or requesting specific information from the Company are not subject to an Opt Out process. If you have any suggestions on how to improve these e-mails, please communicate to our Online Customer Service

group using the Contact Us functionality on the Site. We appreciate your feedback but cannot commit to taking action.

What Personal Information Does the Company Give to Others?

The Company reserves the right to sell or otherwise disseminate your personal information to our subsidiaries, licensees, marketing partners or other third party vendors. The Company, its affiliates and licensees (if permitted by the Company) on occasion may disclose to their business partners certain data, such as your name, address, email address, and specific financial and health-related information, including but not limited to, goals, beneficiary names, type of work, income, and/or net worth, so that the business partner may send their own direct marketing communications to you. If you would prefer that the Company not use disclose your personal information to its business partners for direct marketing purposes, subject to legal or contractual restrictions and legal notice you may opt out of such uses and/or disclosures by sending a letter to the Company stating that you wish to Opt Out.

We may periodically remove from personal information data that can be used to identify individuals for example by summarizing, aggregating or removing certain data elements. The resulting cleaned data is no longer considered personal information and is not subject to this Privacy Policy. The cleaned data may be published by the Company and provided to various third parties.

How does the Company Protect Personal Information?

The Company takes reasonable measures to protect the personal information it collects, uses, stores or discloses. We have implemented physical, technological and organizational procedures designed to protect the integrity and security, and to ensure the appropriate use, of your personal information. These procedures are appropriate to the nature, sensitivity and format of the personal information collected, used, stored or disclosed by the Company.

What about Links to Other Sites?

This Privacy Policy applies solely to information collected by the Company. However, our Site may contain links to other sites owned and operated by third parties. The third parties who operate these sites may treat the collection, use and disclosure of personal information differently than the Company. This could be the case even for those sites that carry the Company's or its affiliates' trademarks or logos or which are framed by a Site. Please be aware that the Company is not responsible for the data collection, use and disclosure practices of companies or organizations to which our Sites may provide links. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every site that collects personally identifiable information.

How Can I Access or Correct My Personal Information?

If your personally identifiable information changes (such as zip code, phone, e-mail or postal address), or if you no longer wish to use our services, we provide a way to correct or update or delete/deactivate your personally identifiable information. You can review or change some of your personal information as follows:

- You may contact our Customer Service department available through the Contact Us tab.

- You can review and change certain Site related information by visiting the Site, entering your e-mail address and password and accessing the “My Account” area.

Note that in most cases, the Company will retain the previously entered data.

Can the Company Change This Privacy Policy?

The Company reserves the right to change this Privacy Policy from time to time. If the Company makes a change, this Privacy Policy will be updated accordingly. We recommend that you review this Privacy Policy periodically so that you are aware of any changes. If we make a material change to this Privacy Policy we will make reasonable efforts to notify you. For example, your continued consent to our collection, use and disclosure of your personal information or your continued use of our Sites following the notification or posting of any changes to this Privacy Policy shall constitute your acceptance of these changes.