

Gold Flow, LLC
Privacy Policy
Revised: November 1, 2009

Gold Flow is a licensee of the TRUSTe Privacy Program. TRUSTe is an independent organization whose mission is to build user's trust and confidence in the internet by promoting the use of fair information practices. This privacy policy covers the website, www.goldflow.com. Because Gold Flow wants to demonstrate its commitment to your privacy, it has agreed to disclose its information practices and have its privacy practices reviewed for compliance by TRUSTe.

If you have questions or concerns regarding the Privacy Policy, you should first contact Gold Flow by email at privacy@goldflow.com. If you do not receive acknowledgement of your inquiry or your inquiry has not been satisfactorily addressed, you should contact TRUSTe at the following website: <http://watchdog.truste.com/pvr.php?page=complaint&url=>. TRUSTe will then serve as a liaison with Gold Flow to resolve your concerns.

Gold Flow Privacy Commitment

Gold Flow understands that you entrust us with your personal information so that we may provide services to you safely and securely. To earn this trust, Gold Flow commits to treating your personal information with the utmost responsibility and highest standards. Here is our Privacy Commitment to you:

- 1. Gold Flow will keep your personal information confidential and secure.**
- 2. Gold Flow will not sell your personal information under any circumstances.**

Gold Flow Privacy Policy

As highlighted in our Privacy Commitment, Gold Flow is committed to safekeeping your personal information. Our Privacy Policy outlines the specific steps Gold Flow takes to keep our commitment to you.

What information we collect and why

Gold Flow collects the following types of information when you sign up and use our services:

- **Identity Information**
This may include your name, address, telephone numbers, and email as well as information provided by identity verification organizations. Gold Flow members must be at least 18 years of age, and therefore, Gold Flow does not intentionally collect any information from anyone under 18 years of age.
- **Financial Information**
This may include financial account information from banks and other financial institutions as well as information provided by credit organizations.
- **Security Information**
This may include your user name, password, and security question / answer as well as website security features including cookies, which are small computer files containing a string of characters placed on your hard drive when you visit a website.

A cookie helps us to verify you and track your usage of the Gold Flow website. When you return to the website, the cookie enables us to recognize your browser. Cookies may store user preferences and other information such as which pages you visit. Cookies may be tied to your personal information. You can set your browser options to delete or not accept a cookie, but certain features or services may not function properly without the cookie.

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- **Transaction Information**
This is a history of your transactions with Gold Flow including buying, returning, giving, receiving, and using Points.
- **Website Usage Information**
This is information that we may track related to usage of the Gold Flow website. It includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We collect this information so that we may process your transactions in a safe and secure manner while complying with all relevant laws and regulations.

How we use the information we collect

Gold Flow uses the information we collect in order to serve our members in a safe and secure manner and to comply with legal requirements. Here are the specific ways Gold Flow uses your information:

- **Identity Verification**
We use your identity information to verify that you are who you say you are and to make sure that no one else is fraudulently posing as you.
- **Financial Account Verification**
We use your financial account information to verify that the accounts are indeed owned by you and to prevent anyone else from fraudulently using Gold Flow to access your financial accounts.
- **Transaction Processing**
We use the combination of your identity and financial information to process transactions on your behalf including the buying, returning, giving, receiving, and using of Points. When a member gives or uses Points, Gold Flow will share some of the member's personal information with the recipient so that the recipient knows who is giving or using the Points.
- **Customer Service**
We use your transaction information to enable you to view a history of your Gold Flow transactions. When you have customer service requests, we use your personal information to verify your identity and to better serve you.
- **Online Security**
In addition to identity and financial account verification, Gold Flow provides added website security measures including the use of Secure Socket Layer (SSL) technology. Our third party partners use similar high levels of online security.
- **Legal Compliance**
Gold Flow uses personal information to prevent fraud and to comply with laws and regulations including those related to anti-money laundering and the prevention of terrorism financing. Gold Flow may share information with various law enforcement authorities and other government entities to help prevent or stop illegal activity. Gold Flow reserves the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on Gold Flow.

Third Parties

Gold Flow partners with banks, credit bureaus, technology firms, and other third parties that help us to provide safe and secure services to our visitors and members. All of these firms maintain the same high level of security and confidentiality as Gold Flow does with respect to personal information. Gold

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Flow does not allow third party service providers to use your information for marketing purposes or any other reason unrelated to the services provided to Gold Flow.

The Gold Flow website includes links to unaffiliated third parties, some of which advertise on our site. These third parties may use cookies to track non-personally identifiable information about visitors to our site in the aggregate. Gold Flow does not share your information with, or sell it to, third party advertisers under any circumstances. If you choose to visit a third party website, it is your responsibility to understand their privacy policy, which may not protect your information to the same degree as Gold Flow.

Reviewing and Updating Your Information

You may review and update your information at anytime. You can do this by logging onto Gold Flow and changing your information on the "Profile" page under the "My Points" tab.

Opt-In/Out Policy

When you initially sign up for Gold Flow, you may choose whether or not to receive marketing emails from Gold Flow. Thereafter, members can opt-in or out of receiving marketing emails at anytime. You can do this by logging onto Gold Flow and changing your preference on the "Profile" page under the "My Points" tab. You may also email Gold Flow at privacy@goldflow.com.

Merger or Bankruptcy

In the event of a merger or sale of Gold Flow to another entity, Gold Flow will require the other entity, as a condition of entering into such merger or sale, to commit to treating your information with the same level of responsibility and high standards as committed to in our Privacy Policy. In the event of a bankruptcy, Gold Flow will adhere to the requirements of bankruptcy law while employing our best efforts to continue the same level of protection for your information as committed to in our Privacy Policy.

Contact Gold Flow

If you wish to contact us regarding our Privacy Policy or a privacy matter related to your information, please send us an email at privacy@goldflow.com. In addition, you may send a correspondence to Gold Flow, LLC, 35 N Central Ave., Suite 207, St. Louis, MO 63105 or contact us by telephone at (314) 721-8900 or facsimile at (314) 721-8909.

Changes to Privacy Policy

Gold Flow reserves the right to make material changes to our Privacy Policy at anytime by posting a prominent notice of a revised version on our website homepage and privacy page. Gold Flow will email the current Privacy Policy to all members once per year.