

Privacy Policy

Last updated: February 10, 2021

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Referral Program and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Referral Program. By using the Program, You agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **You** means the individual accessing or using the Program, or the company, or other legal entity on behalf of which such individual is accessing or using the Program, as applicable.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to GoldenCare USA, LLC. (a subsidiary of Integrity Marketing Group, LLC), 10700 County Road 15, Plymouth, MN 55441.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Account** means a unique account created for You to access our Program or parts of our Program.
- **Website** refers to Integrity Direct Longevity Planning Referral Program, accessible from <https://www.IntegrityLTCDirect.com>
- **Program** or **Referral Program** refers to the Integrity Direct Longevity Planning Referral Program and/or Website.
- **Referred Lead** refers to individual(s) you provide information to Us about for the purposes of the Program.
- **Country** refers to: Minnesota, United States
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Program, to provide service on behalf of the Company, to perform services related to the Program or to assist the Company in analyzing how the Program is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Program.
- **Personal Data** is any information that relates to an identified or identifiable individual.

- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Device** means any device that can access the Program such as a computer, a cellphone or a digital tablet.
- **Usage Data** refers to data collected automatically, either generated by the use of the Program or from the Program infrastructure itself (for example, the duration of a page visit).
- **Do Not Track** (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our Program, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You or Your Referred Lead. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

Usage Data

Usage Data is collected automatically when using the Program. This data is used solely for the purposes of the Program. Although we may have paid a referral fee for the purposes of implementing this Program, this data is not shared, sold or distributed to any third-party not directly involved in the necessary operation of the Program.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Program that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Program by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Program or when You access the Program by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar common tracking technologies to track the activity on Our Program and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Program.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Program.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser. Learn more about cookies: [All About Cookies](#).

We use both session and persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

Use of Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Program**, including to monitor the usage of our Program.
- **To manage Your Account:** to manage Your registration as a user of the Program. The Personal Data You provide can give You access to different functionalities of the Program that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the contract in which We have agreed to pay You for Referred Lead Fees through your participation in the Program or for any other contract with Us through the Program.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To contact Your Referred Lead(s):** To contact Your Referred Lead(s) by email, telephone calls, SMS, or other equivalent forms of electronic communication as necessary to, and limited to, fulfillment of the Program Terms & Conditions.
- **To provide You (but NOT Your Referred Lead(s))** with occasional news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already used, purchased or inquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.

We only share Your or Your Referred Lead's personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Program, to contact You.
- **For Business transfers:** We may share or transfer Your and/or Your Referred Lead's personal information in the unlikely event that it is necessary in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** Only as necessary to fulfill the Terms & Conditions of the Program, We may share Your and/or Your Referred Lead's information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With Business partners:** Only as necessary to fulfill the Terms & Conditions of the Program, We may share Your and/or Your Referred Lead's information with Our business partners to offer designated products or services.

Retention of Personal Data

The Company will retain Your and Your Referred Lead's Personal Data only for as long as is necessary for the purposes set out in the Program Terms & Conditions and this Privacy Policy. We will retain and use Your and/or Your Referred Lead's Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Program, or We are legally obligated to retain this data for longer time periods.

Transfer of Personal Data

Your and/or Your Referred Lead's information, including Personal Data, is processed at the Company's operating offices and in other necessary places where the parties involved in the processing and fulfillment of the Terms & Conditions of the Program are located. It means that, while unlikely, it may be possible that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer if fulfillment of the Term & Conditions of the Program necessitate said transfer.

The Company will take all steps reasonably necessary to ensure that Your and/or Your Referred Lead's data is treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of data and other personal information.

Disclosure of Personal Data

Business Transactions

In the unlikely event the Company is involved in a merger, acquisition or asset sale, Your and/or Your Referred Lead's Personal Data may be transferred.

Law enforcement

Under certain rare circumstances, the Company may be required to disclose Your and/or Your Referred Lead's Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your and/or Your Referred Lead's Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Program
- Protect the personal safety of Users of the Program or the public
- Protect against legal liability

Security of Personal Data

The security of Your and Your Referred Lead's Personal Data is very important to Us, but remember that no method of transmission over the Internet, or method of electronic storage can be guaranteed to be absolutely 100% secure. While We strive to use commercially acceptable means to protect Personal Data, We cannot guarantee its absolute security.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Program systems are not designed to respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if you are a California resident, You can contact Us using the contact information provided below.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code section 22581 allow California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Links to Other Websites

Our Program may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Program website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy will be effective based on the "Last Updated" date as it appears at the beginning of this posted Privacy Policy.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: Info@IntegrityLTCDirect.com