

The following information is provided pursuant to the requirements of the California Online Privacy Protection Act of 2003 (CalOPPA), as amended in 2013; regulations promulgated thereunder; the official Recommended Practices of the California Attorney General’s Privacy Enforcement and Protection Unit; and other state, federal and international statutes and regulations as applicable. This information therefore falls under the requirement of “State and/or international privacy law information” under paragraph C.3(c)(1) of the Instructions to the Model Privacy Form presented in the Appendix to Title 12, Chapter X, Part 1016 (Regulation P), Subpart D of the Electronic Code of Federal Regulations and is appropriate to provide in this “Other important information” box of the Model Privacy Form.

This Privacy Policy, including the Model Privacy Form, applies to personal information collected on or from this website, and any other Western Benefits Group, LLC (“WBG”) websites (collectively, the “Site”) and personal information collected from emails, telephone calls, and other communications sent to WBG, and collected via other sources, as described below.

By visiting and using our Site, or otherwise providing personal information to us, you indicate that you accept the practices described in this Privacy Policy.

Please remember that whenever you leave our Site to visit a linked website, you are subject to the terms and policies of that other website. We are not responsible for the privacy practices of the other website. Please review those other terms and policies before proceeding.

We may have collected personal information from you before this Privacy Policy took effect. By using this Site, or otherwise providing personal information to us, you consent to our continued use of previously collected personal information under these terms. If you do not want us to do so, please contact us as provided in the “Questions?” section above.

California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy.

According to CalOPPA we agree to the following:

- Users can visit our site anonymously
- Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our website.
- Our Privacy Policy link includes the word "Privacy," and can be easily be found on the page specified above.
- Users will be notified of any privacy policy changes:
 - On our Privacy Policy Page
- Users are able to change their personal information:
 - By emailing us
 - By calling us
 - With respect to opting out, by clicking a link to an opt-out form

How does our site handle do not track signals?

We do not recognize do not track signals and may track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third party behavioral tracking?

We do allow third party behavioral tracking.

Notice to California Residents - Your California Privacy Rights:

(As Provided by California Civil Code section 1798.83). California's "Shine the Light" law, Civil Code section 1798.83, requires certain

businesses that share customer personal information with third parties for the third parties' direct marketing purposes to respond to requests from California customers asking about the businesses' practices related to such information-sharing. Alternately, such businesses may have in place a policy not to disclose a customer's personal information to third parties for the third parties' direct marketing purposes if the customer has exercised an option to opt out of such information-sharing. We have such a policy in place. As described in this Model Privacy Form and Privacy Policy, you can opt-out of our sharing of your personal information with third parties for the third parties' direct marketing purposes by following the instructions in the "To limit our sharing" section above. To find out more about your opt-out rights, please review this Privacy Policy or contact us by emailing or writing to us at the address listed below under the "Contact Us" section. Please note that under California law businesses are only required to respond to a customer making such a request once during any calendar year.

What Personal Information We Collect

All Site Visitors

When a visitor accesses our Site, we collect the visitor's IP address and browser information. An IP address is a unique locator for a visitor's computer that is used to find the visitor's computer on a network. A website uses the IP address to send information to the visitor's computer. The visitor's computer or Internet service provider may assign a different IP address to the computer for different Internet sessions. Browser information includes the type and version of the Internet browser that is being used, such as Internet Explorer. If one of our online marketing initiatives leads a visitor to our Site, we also identify the website or location from which that visitor came. We also collect information regarding the visitor's traffic patterns and Site usage, such as the time spent on a page, or the links or advertisements on which the visitor has clicked.

WBG Members

WBG members may register with our Site. When you register, we collect your membership number. Registering with our Site triggers the creation of a cookie on your computer, which allows us to recognize

that a visitor is one of our members. If you register with our Site, the information we collect about your traffic patterns or Site usage through our cookies and action tags is linked to you through this cookie.

After you have registered, the information we collect about your traffic patterns or Site usage may be linked to you, and any other information we may have about you in our databases.

If you attempt to login on our Site and you have previously deleted our registration cookie, you will have to type in your login ID again, and a new cookie will be created. The information we collect about your traffic patterns or Site usage may be linked to you through that cookie so that we may present products and services that may interest you.

WBG members who have registered with our Site may have access to products or services and other benefits that are available only in restricted areas of our Site. On these pages, our members can also perform certain activities, such as making payments or changing passwords or preferences. To access these restricted areas, the registered WBG member must use a additional credentials, such as a login ID, e-mail address and/or a password.

For service emails that we exchange with you (e.g., account questions), we collect the personal information needed to handle your request, and retain it for statistical and reporting purposes. For example, we collect the personal information you provide when you email a question about your account, so that we can follow-up and respond. We keep track of the email exchange for reporting purposes, so that we know how many inquiries of a certain type were received and handled.

We may track the open and click-through rate of any promotional emails for statistical purposes and to identify those emails that a specific recipient has opened. If you respond to one of our promotional emails, we record the information you provide with other data that we have and that is associated with that same email address.

If you fill out one of the forms or questionnaires posted on our Site

(e.g., to request a phone call or email), we collect your e-mail address, as well as the other personal information that you provide in response to the questions. We may combine it with information, if any, that we may have in our database and that may be associated with your name or email address. The questions we ask are necessary for us to understand your needs, so that we can respond accordingly.

When you request services on our site or over the telephone, apply for membership, or file a complaint with us, we will collect all of the information necessary to complete the transaction, perform the service, or resolve the matter at issue, including your name, membership number, telephone numbers, postal and e-mail addresses, vehicle and mobile phone information and general location, and billing information (such as credit card number, cardholder name, expiration date, security code and bank account information), and any other relevant information such as student loan account information or other information about your debt.

How We Collect Personal Information

Directly from You

- Some of the personal information that we collect is provided directly by you, when you send us emails or fill out the forms displayed on our Site.
- To make our Site and services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, IP address, domain name and date/time stamp for your visit.

Cookies

Like most websites, we use cookies. Cookies are small files that a website sends to a visitor's computer when the visitor lands on a particular area of the Site. Cookies serve to identify a specific computer, so that we can recognize a returning visitor. While most browsers (Explorer, Safari, Firefox, etc.) accept cookies automatically,

you can choose to reject cookies or to have your computer warn you each time a cookie is being sent. Cookies are browser specific. If you use different browsers, you will have to define your preferences on each browser. You can delete all or some of these cookies from your computer by activating the “delete cookies” feature in your browser. If you have several browsers, you must reiterate the deletion request for each browser. Since cookies help identify a computer, without a cookie, each time you open a new page, the server for that page cannot recognize you, and treats you as a new visitor. As a result, you may not have access to some of the features offered on our Site if you refuse the use of cookies. For example, if you delete your cookies, you may have to re-enter your personal information or preferences. Cookies are stored on a specific computer. If you use different computers, you will need to configure each computer to suit your cookie preferences.

Action Tags

Like many websites, we may also use action tags to identify some of the pages that a user visits, and how he or she uses the content on these pages. Action tags may also be placed in advertisements that are served on our behalf on our Site and third party websites. We also may use action tags in our emails, to determine whether an email was opened, or whether it was forwarded to someone else. For example, we may configure action tags to collect information about which sections of our Site you visit, when you view or print a page, how long you stay on the Site, or on which links or advertisements you click. Action tags may collect and transmit this information in a manner that identifies you personally.

Third Party Cookies and Action Tags

We may use service providers to help us with our electronic communications, analyze the use of our Site, and serve advertisements on our behalf on our Site and on other websites across the Internet. These third parties may use cookies and action tags to track activities on our Site and other websites in order to produce user profiles and aggregate information about the use of our Site. User profiles may be used to personalize advertising, including e-mails, based on the user's interests and activities identified in the user's profile.

Third Parties

- We may receive personal information and aggregated data about you from companies that provide our services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our Site or directly to or for us. These third-party companies may supply us with personal information. We may add this information to the information we have already collected from you via our Site in order to improve the services we provide.
- If you log on to the Site with your login credentials from a social networking site, we may receive personal and/or anonymous information about you from such social networking site, in accordance with the terms of use and privacy policy of the third-party provider of such social networking site. We may add this information to the information we have already collected from you via the Site.
- If you decide to refer a friend to become a member, we will collect your and the third party's names and e-mail addresses in order to send an e-mail and follow up with the third party.

How We Use the Personal Information That We Collect

We use the personal information that we collect for several purposes:

All Site Visitors

- We use personal information that we collect in aggregate form, for statistical purposes, to better understand our visitors, optimize the content that we serve, and improve the ways in which we provide information about our company. For example, aggregate information is used to find out what are the most commonly used browsers; or what the existing and future needs are for our products and services.
- We may combine personal information with other information that we have previously collected from you or we have obtained from third parties in order to communicate with our visitors, for

direct marketing or email marketing purposes. For example, we may use personal information that we have collected in order to follow up on your questions, requests for information or services.

- If you provide your email address, we may enroll you in our promotional email programs. You can opt-out at any time, as indicated in each of our promotional emails. If you provide your telephone number, where permitted by law and regulation we may initiate an automated or live phone call from a third party or add your telephone number to an event or lead list that our agents may use to contact you.
- We use cookies to facilitate navigation of the Site; keep track of advertisements; and compile aggregate data about Site traffic and Site interactions in order to offer better Site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf. We may associate cookies with information about a visitor's use of the Site and use them to combine data about that person with other data about that person. We may combine personal information that was collected through action tags and cookies with other information about a user's prior visits in order to evaluate the success rate of our advertising programs (on other websites or in newsletters), such as the open rate or the conversion rate. The information may also be used to identify products or services in which a specific user might be interested. For example, we may use personal information about a user's visits to this and other websites to identify products or services in which that user might be interested. We may then deliver to that user, directly or through our advertising agencies, advertisements and emails that promote these types of products or services to that user.

WBG Members and prospective members

- We use your personal information to facilitate the creation of and secure your account, identify you as a user in our system, provide improved administration and quality experience of our Site and services, and provide the services you request. We may send you

administrative e-mail notifications, such as security or support or maintenance advisories, or contact you to solicit your feedback.

- We use billing information to issue invoices, administer accounts, collect and process payments, complete the requests you may conduct on our Site. We may use other information about you to provide you with confirmations and updates on services you request, or to manage your account, including processing bills and providing notifications.

Other Disclosures

- We may disclose personal information as set forth above in the Model Privacy Form.
- In addition, we may disclose personal information to a party or a representative of a party to a proposed or consummated sale, acquisition, transfer, merger, or consolidation of all or part of our organization. Before the consummation of any such transaction, we will disclose only such personal information as is reasonably necessary to enable the recipient to make business decisions about the proposed transaction. We will require the recipient to agree not to disclose the information, unless the disclosure would otherwise be permitted by this Privacy Policy. If another company acquires our organization or our assets (including via merger, acquisition, sale of shares, sale of assets, or bankruptcy), that company will possess the information collected by us and will assume the rights and obligations regarding your information as described in this Privacy Policy.
- We also may disclose personal information:
 - To a law enforcement or other governmental authority pursuant to law; or in response to a facially valid administrative or judicial order, including a search warrant or subpoena.
 - To establish or exercise our legal rights; to defend against legal claims; or as required by law.

- To detect or prevent criminal activity, fraud, material misrepresentation, or material nondisclosure; to protect and defend the rights, property, or safety of our organization or others; or in connection with the enforcement of our Terms and Conditions and other agreements.

How You Can Protect Your Personal Information

Please remember to protect your email address, login ID, password, and computer against unauthorized access. Remember to sign out of your password-protected account when you are done, and close your browser to prevent your settings from being displayed to the next user. Each member is responsible for keeping his/her login ID and password confidential. Please contact us immediately if you lose or misplace your login ID and/or password, or if you become aware of an unauthorized use of your login ID, password, or account information, so that we can deactivate your login ID. You will be held responsible for all activities and access to our Site - including all purchases of membership or products and services made through our Site - that were made through that login ID and password, and that occurred before you notified us of their loss.

Other Privacy Policies

Some surveys or forms may be subject to a different privacy policy. Please review the privacy policy that is linked to a survey or form before filling out the survey or form. **Please Note: We do not specifically market to children under the age of 13.**

Linking to Other Sites

Several pages of our Site may include links to third parties' websites,. While these websites may have a similar look and feel as our Site, they are separate websites operated by separate entities. You may also be transported to a third party's website if you click on an advertisement or other link that is displayed on our Site. When you choose to access these third party websites, a separate window may or may not launch, but you will leave our Site. Please remember that whenever you leave our Site to visit a linked or other website, you are subject to the terms, conditions, and policies of that other website. We are not responsible

for the terms and conditions, or the privacy practices of other websites. Please review these provisions before proceeding.

Changes to this Privacy Policy

We may revise this Privacy Policy from time to time. You are therefore advised to re-read this Privacy Policy on a regular basis. Your continued use of our Site following the posting of any changes to this Privacy Policy constitutes your acceptance to these changes. If there is a material change to the terms of this Privacy Policy, WBG will provide notice and choice, if such is required, in accordance with the then-applicable legal requirements.

Contact Us

WBG may be contacted as follows:

- Send an e-mail to: info@westernbenefitsgroup.com
- Call WBG at: 855-286-3818
- Send a letter to the following address:

WBG, 7172 Regional Street #403, Dublin CA 94568