# **Privacy Policy**

GlobalAssimilate.com respects your privacy. Our staff, contractors, and others who help us operate our websites follow this policy on privacy and fair information practices for online activities of GlobalAssimilate.com.

This Privacy Policy applies to information GlobalAssimilate.com collects online through its websites and other domains owned by GlobalAssimilate.com, Inc. ("GlobalAssimilate.com") including GlobalAssimilate.com and other domains owned and operated by us. We refer to these websites as www.GlobalAssimilate.com and to the other domains as the "GlobalAssimilate.com Sites." Other domains include <u>www.addressbook.com</u>, <u>www.myaddressbook.com</u>, <u>www.reunion.com</u>, <u>www.highschoolalumni.com</u>, <u>www.GlobalAssimilate.com</u>, <u>www.whoislookingforyou.com</u>, <u>www.whoissearchingforyou.com</u>, <u>www.whoissearchingforyou.com</u>, <u>and <u>www.goodcontacts.com</u> This policy also describes our information practices with regard to information we may have obtained about you from public records, which has recently become available on our Sites. For more information about this new service, please visit our Frequently Asked Questions page, available <u>here</u>.</u>

While GlobalAssimilate.com Sites each offer a different combination of services and tools from one site to another, this policy states GlobalAssimilate.com's company-wide Privacy Policy with regard to data-collection practices. Please refer to our <u>User Agreement</u> for the registered Members' terms of service, which states the terms of use.

By registering as a Member of a GlobalAssimilate.com Site, you agree to accept this Privacy Policy and are aware that our policy may change over time as discussed below.

# **Overview of Our Policy**

The security of your personal information is a high priority at GlobalAssimilate.com. We maintain these websites and all associated data with technical, administrative, and physical safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure. No computer system or information can ever be fully protected against every possible hazard, but GlobalAssimilate.com is committed to providing reasonable and appropriate security controls to protect our websites and their information against foreseeable hazards.

The information you provide helps us and our partners (including our service providers, advertisers, and other partners) make the GlobalAssimilate.com Sites more fun and useful for you. It also enables us to provide you updates about our services and special offers from our partners. When you become a registered Member of our site, you may receive email or postal mail from GlobalAssimilate.com. If you have so elected, you may also receive email or postal mail from our partners. You can change your email settings at any time by going to your Global Assimilate account and clicking the 'Settings' link at the top of the site.

Please keep in mind that whenever you voluntarily provide information in public areas of a GlobalAssimilate.com Site, such as the user profile pages or people search, that information can be viewed and possibly used by others, both on the GlobalAssimilate.com Sites and potentially on our partners' sites, such as Wink.com. We advise users not to disclose contact information, including phone number, email address, street address, or instant messenger address (examples of "personally identifiable information") within these public areas that they do not wish to share. This

information should instead be maintained in the appropriate email and contact information section of this site, which is protected under the terms of this privacy policy.

## **Changes to this Policy**

This Privacy Policy is available on this page for you to read. This Privacy Policy may be updated and modified from time to time to reflect new features, services and options, as well as any other changes with regard to the use of personal information. Users will be notified by email and shown a prominent notice on the home pages of the GlobalAssimilate.com Sites of any material changes to our Privacy Policy. By registering as a member of a GlobalAssimilate.com Site, you agree to accept this Privacy Policy and are aware that our policy may change over time. Continued use of the GlobalAssimilate.com Site or other GlobalAssimilate.com services will signify that you agree to these changes.

# About Children

The GlobalAssimilate.com Sites are not directed to children under the age of 13. The GlobalAssimilate.com Sites prohibits registration by and will not knowingly collect personally identifiable information from anyone under 13. Note to parents: If you have any concerns about the GlobalAssimilate.com Sites or their related services, please contact us by <u>clicking here.</u>

## Information Collection and Use

Below are more details about the information the GlobalAssimilate.com Sites gather from you and how we use it.

A. Email Newsletters, Updates, and Invitations. GlobalAssimilate.com Sites offer email newsletters and important account activity updates that may include material that is promotional in nature. These email updates may also include offers from GlobalAssimilate.com's marketing partners. As part of the GlobalAssimilate.com service you will receive these updates. If you want to update your email address or stop receiving any of the updates, follow the unsubscribe procedures at the bottom of any newsletter or update we send you; alternatively, you may change your notification settings by clicking on the "Settings" link on the upper-right of your home page and visiting the Email Notification Settings page from there.. Please note that even if you unsubscribe from any promotionally oriented emails, newsletters, or account activity updates, you may continue to receive transactional email messages from GlobalAssimilate.com with important information pertaining to your account and our services, such as notifications related to a paid subscription.

If you choose to use our referral service to tell a friend about our site, we will ask you for your friend's name and email address. We will automatically send your friend an email inviting him or her to visit the site, plus two reminder emails if they do not respond. GlobalAssimilate.com stores this information to send these emails, track the success of our referral program, and locate contacts across the web.

Your friend may contact us at <u>support@GlobalAssimilate.com</u> to request that we remove this information from our database.

#### **Your Contacts and Their Information**

To make the best use of GlobalAssimilate.com and to help you keep in touch with your contacts and with other Members, we make it easy for you to invite people from your email address books to join you on GlobalAssimilate.com. At your request we will search your email address book to see if anyone in it is already a Member of GlobalAssimilate.com; you can also select and/or input your contacts' email addresses manually. Contacts who are not registered Members will receive an email invitation from us on your behalf inviting them to join. We may follow up such invitations with two reminder emails to some contacts if they do not respond to the initial invitation. The login credentials you enter when searching your email address book are used only for that purpose and are not stored or shared.

This feature -- a helpful, easy way to connect with your friends and family and keep everyone updated on your life -- is common on many social networking sites. Information you enter about your contacts is covered by the same privacy policy terms as your own personal information on GlobalAssimilate.com.

In addition to the above, we also let you know where else your friends are located online. We use the email address you provide for each of your contacts to search across the internet to see where else they may be members.

**B. Global Assimilate Member Profiles.** As of September 17, 2008, GlobalAssimilate.com Sites have two kinds of profiles. A GlobalAssimilate.com Member is someone who has created an account by registering on our site (as a paid or free member), agreed to our <u>User Agreement</u>, and personally submitted profile information. Every member has a Member Profile, which includes information you provide, and may also include information available to us from various sources in the public domain. This includes but is not limited to photos from other websites you may be a member of. Upon your initial registration on GlobalAssimilate.com, we will scan the internet for other sites you have joined and pull photos or other information you may have there to fill in missing sections of your Global Assimilate profile. We reserve the right to add public-domain information to your profile at any time, without your consent. You can, however, edit and/or update this information on the Global Assimilate site whenever you choose by going to the Edit section of your profile and adjusting the information as you wish. This is a valuable service we provide in order to provide the most comprehensive results for our people search features.

When you register for membership on one of our sites, we ask for information about you and your interests. We do this so we can better understand what you like and tailor the site to suit you better. At a minimum, we require your name, birth date, gender, email address, and zip code. The more information you volunteer, the more we can tailor the site, updates, and promotions to your interests. We may engage third parties to perform analysis or data processing of our databases that involves access to this information in order to better provide you with the services for which you joined (in which case we will take measures to ensure that such parties are contractually required to keep the information confidential and not to use it other than in a manner that is necessary to perform their work for GlobalAssimilate.com).

When you purchase a service from GlobalAssimilate.com, you will be required to provide us with certain contact information, including your name, email address, and billing address. We also require other information necessary to process your payment (such as a credit card and expiration date). We may use the information you provide us to bill you for products and services you have requested, or to notify you of additional products and services available to

you. By becoming a Member, you agree that we may share this information with our service providers, which may include banks and credit card companies we use to process your transaction. They are prohibited from using this information for any other purpose including their own marketing purposes.

We may also use or disclose your membership registration or other personally identifiable information as follows:

- Service Providers. We sometimes offer our Members services provided by third parties. When you register for membership on a GlobalAssimilate.com Site or activate a service by clicking on a particular service link (e.g., email) on our sites, you may be automatically registered to receive the free services we offer, and some of your personally identifiable information may be shared by GlobalAssimilate.com with those third-party service providers, such as our credit card processing company. We take care to require that our third-party service providers use our Members' data only as necessary to provide the particular service requested. These service providers may not use this information for any other purpose, including their own marketing purposes.
- **Co-registration with Other Sites.** As a Member, we may offer you the ability to co-register with select third-party partner sites. In some instances where GlobalAssimilate.com provides co-registration, the co-registration partners allow you to opt out of their membership. If you choose to co-register with our partners and accept their terms of service, then you are automatically registered as a member of their select websites, and your personally identifiable information is shared with those organizations. As a result, you may receive information from one of these websites as any of their members would. We advise you to review their privacy and data collection policies for further information. We are not responsible for the use of your personally identifiable information by any such service provider. In order to cancel your membership with any of these partners you will need to go directly to the partner's site. Examples include special discount savings subscription offers from Web Loyalty and Lift Media.
- Certain Third Party Co-marketing partners. We may from time to time share your personally identifiable information with our third party co-marketing partners if we believe they have an offer that would be of interest to you.
- **Third-Party Search Engines.** When you create, claim, or register a public profile at GlobalAssimilate.com, you authorize GlobalAssimilate.com to publicly disclose such information, other than personally identifiable information, through the GlobalAssimilate.com website as well as other third-party search engines and websites.
- Updates to Personal Information. When you become a Member, other Members and third parties may, through use
  of our GlobalAssimilate.com for Outlook and other specified services, seek to update their personal contact lists by
  requesting your personal information, including your personally identifiable information. In some cases, businesses
  may send us a list of personal information in an attempt to contact customers or subscribers whose contact
  information may have changed. WE WILL NOT PROVIDE YOUR PERSONALLY IDENTIFIABLE INFORMATION TO
  THESE OTHER MEMBERS, BUSINESSES, OR OTHER THIRD PARTIES WITHOUT YOUR CONSENT. We will
  notify you when any such request for your contact information is made, and you will be provided with the option to
  accept or decline the request. If you do not respond to this request, you will be considered to have declined the
  request, and your updated contact information will not be provided.
- **Blogs and Forums.** Be aware that any personally identifiable information you submit can be read, collected, or used by other users, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit.
- Searches. When you search for another person while logged into Global Assimilate, your search may be shared via our Who's Searching for You feature. With this feature, another member may be notified if you have searched for someone with a name matching theirs. Other members also may be notified if you view their profile while logged into Global Assimilate.

• **Testimonials.** We use testimonials on this site. When you submit a testimonial, we will request your permission before publicly posting this and any of your personally identifiable information on the website. If you would like your testimonial removed at any time, please contact us by clicking here.

**C. Global Assimilate Public Profiles.** A Public Profile is one that has been created by us using public-domain information. People can search on GlobalAssimilate.com by various parameters for people from their past. If people search for you on the internet, for example at a search engine such as Google or Yahoo, they may be directed to your public profile. If you are a Member, they will see your Member Profile as well. Your Member Profile may include additional public domain information, such as your telephone number. We do not have the ability to remove your profile or information from other, non-Global Assimilate people-search services, public records databases, or online search engines. But we do offer you the ability to claim or register your Public Profile on our site, including control of the fields of data which are displayed to the public. Our registration and profile claiming features, and answers to questions (such as what to do if information is inaccurate) are described more thoroughly <u>here</u>.

To request that a Member Profile or Public Profile be deleted, please contact Customer Care at 949-205-0296 949-205-0296 or contact us by email at <u>privacy@GlobalAssimilate.com</u>. Upon receipt of these requests, and confirmation that you are requesting that your own profile be removed, please allow Global Assimilate 10 business days to complete this removal. It may be necessary to contact you to validate that you are the profile owner requesting the removal. This is to ensure the correct identity and profile ownership before completing these requests, and is for the protection of our users and their privacy.

**E. Email Updates to Members.** The GlobalAssimilate.com Sites periodically send service email updates announcing special offers and/or new features to registered users. This may also include email offers from selected marketing partners. If you want to update your email address or stop receiving any of the updates, follow the unsubscribe procedures at the bottom of any newsletter. Alternatively, you may change your notification settings by visiting the Email Notification Settings page located in the My Account area of our site. If you are not a member of Global Assimilate and you are receiving emails you wish to opt out of, please contact Customer Care at 949-205-0296 or by email at privacy@GlobalAssimilate.com. You can also unsubscribe from all future Global Assimilate emails by entering your email address <u>here</u>. Please allow 7-10 days for your request to process.

**F. Promotions.** We ask you for personally identifiable information at other times, including but not limited to when you enter sweepstakes, contests, or promotions sponsored by a third party. If you choose to enter sweepstakes, contests, or promotions of this nature, we may share your personally identifiable information with third parties involved in the promotion so they can contact you. They may use that information to send you advertisements or other notices, and it is possible that your information may be shared with others. If you do not want to share your personal information with these third parties, do not enter into promotions of this nature.

**G.** Surveys and User Research. GlobalAssimilate.com conducts email and web-delivered surveys from time to time, as well as instant polls, to gather information about our audience. It is important to remember that taking these surveys and polls is entirely optional. You have no obligation to respond to them. We share only the aggregate results of these surveys, not individual data, with our advertisers and partners to help them better understand our services

and monitor the reach of their advertising on our service. We also store some of the information that our users provide in these surveys to help us understand your interests and to make the site more useful for you.

**H. Use of Cookies.** On the Internet, a "cookie" is a piece of information (a file) that a website transfers to a user's computer for record-keeping purposes. The use of cookies is common on the internet. The process we use to serve advertisements and to track use of our site involves cookies. Our cookies are tied to personally identifiable information that you provide when registering for our service. Cookies help us and our advertising service (discussed below) track the frequency and placement of advertisements. Cookies also enable us to measure the aggregate or total usage and traffic to our site and to specific offerings. This aids us in producing content that best meets our users' preferences. In order to implement new services, we may use other types of cookies as well. We also may use cookies to understand better what parts of our site you like best. We may use that information to display advertisements that we think will be of particular interest to you. You may configure your browser to reject cookies, but this may interfere with some functionality of the GlobalAssimilate.com Sites. To find out more about changing your browser to reject cookies, we suggest the <u>EPIC Cookies Page</u>.

We also employ a software technology called clear gifs (a.k.a. Web Beacons) that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We tie the information gathered by clear gifs to our customers' personally identifiable information in order to remember who you are and track your account preferences.

We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, please see, "Choice and Opt-out."

Some of our business partners (e.g., advertisers) use cookies and Web beacons on our site. We have no access to or control over these tracking technologies. See "Third Party Advertising."

**I. Log Files.** As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click stream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site, and to gather demographic information about our user base as a whole.

We do not link this automatically collected data to personally identifiable information.

We use a third-party tracking service that uses cookies to track non-personally identifiable information about visitors to our site in the aggregate in order to track the volume of visits, usage of certain features, and length of time on site. This information is used to gain insight into customer needs and behavior in order to help us improve the site and services offered.

J. Sites You Visit. As you access our affiliate sites and browse around the Global Assimilate Sites, GlobalAssimilate.com may store information about which pages and which affiliate sites you visit and other information presented in your browser's URL address line. GlobalAssimilate.com will use this information to help determine what our users are most interested in.

**K. Other Third Parties.** GlobalAssimilate.com may share non-personal, aggregate, or summary information regarding our users with other third parties not mentioned in this policy. This kind of information does not identify you individually but is often used to provide general demographics or statistics.

L. Merger or Acquisition. In the event of a business transaction such as a merger, acquisition, reorganization, or sale of substantially all or a portion of our assets (including a website owned by us), you agree that GlobalAssimilate.com may transfer your personally identifiable information to a third party as a part of such merger, acquisition, reorganization, or sale.

**M. Legal Authorities.** The GlobalAssimilate.com Sites may also disclose personally identifiable information in cases when we have reason to believe that it is necessary to identify someone who may be violating GlobalAssimilate.com's User Agreement or may be causing injury to GlobalAssimilate.com's rights or property, other users, or anyone else. The GlobalAssimilate.com Sites may disclose personally identifiable information of our users to government authorities at our discretion.

We reserve 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 to comply with a judicial proceeding, court order, or legal process served on our website.

#### Access to Other Sites Through GlobalAssimilate.com

You may also visit independent websites not operated by GlobalAssimilate.com that are connected to our network for our users. Such sites are operated by external, third-party service providers. Some of these sites will have their own separate membership processes and privacy policies. The GlobalAssimilate.com Sites do not control sites that are operated by others and so cannot be responsible for the information practices of these sites. Other sites may set their own cookies, collect data, or solicit personal information. It is always a good idea to check the Privacy Policy and Terms of Use of any site before offering any of your personal information.

# **Third-Party Advertising**

We use ad serving technology and other third-party advertising companies to serve ads when you visit our website or receive our email newsletters and updates. These companies may use information (not including your name, address, email address, or telephone number) about your visits to this and other websites in order to provide advertisements on this site and other sites about goods and services that may be of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please <u>click here.</u> Third Party Cookies: In the course of serving advertisements to this site, our third-party advertiser may place or recognize a unique "cookie" on your browser.

#### Security

The GlobalAssimilate.com Sites endeavor to protect the security and integrity of the information you provide to us once it is received on our systems. However, when you submit information about yourself to the GlobalAssimilate.com Sites over the internet, the information may travel over many systems that are not under the control of GlobalAssimilate.com. We take the protection of user data very seriously and to that end provide extra assurances that your information will not be intercepted. In the case of shopping pages, for example, the credit card information you submit is protected by secure servers.

When you enter sensitive information (such as credit card information and/or social security number) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL).

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. But no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. If you have any questions about privacy or security on our website, you can email us at privacy@GlobalAssimilate.com or contact our Customer Care team at 949-205-0296 949-205-0296 .

## **Changing or Updating Your Information**

**Member Profiles:** To change or update your account information such as your interests or what you are doing now, please use the "My Profile" link to change your profile page at GlobalAssimilate.com. To change or update your contact information such as your email or physical address, please use the "Settings" link to change your Global Assimilate information.

**Public Profiles:** If you would like to edit your Public Profile, you will first need to claim it through our Public Profile Claiming feature. This allows you to prove your identity and take control of this profile. You can prove your identity by answering a few simple questions, or use a credit card to prove your identity. Should you choose this method, nothing will be charged to your card, but it will be used to verify your name and address information. Once you successfully claim your profile, you will be able to edit and update any of the information in it at any time by logging into the site and going to the "My Profile" link on the homepage.

#### Cancellations

We reserve the right to send you customary business communications (i.e. renewal notifications, general system and administrative messages, address confirmations, etc.) without offering you the opportunity to opt out of receiving them. We do provide you the opportunity to choose the frequency of certain email notifications (including the choice not to receive any), such as notifications of who's searching for you, new member matches, and who's viewed your profile, by visiting the Email Notification Settings page in the "Settings" area of our website. We also provide you the opportunity to unsubscribe from emails notifying you of special offers or discounts, alerts about birthdays or new members, tips or tricks for using our service, or selected offers from our marketing partners by visiting the Email

Notification Settings page, or alternatively following the unsubscribe procedure/link at the bottom of the email message.

# **Still Have Questions?**

If you have any other questions about the GlobalAssimilate.com Privacy Policy, please contact us by email at <a href="mailto:privacy@GlobalAssimilate.com">privacy@GlobalAssimilate.com</a> or write to us at:

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**GlobalAssimilate.com, Inc. Attn: Privacy Policy Officer** 6841 Rook Dr Huntington Beach, CA 92647