

The following discloses our information collection, use and dissemination practices for servicesinsync.com, a Web site of Affinion Benefits Group, LLC. Effective Date: This Online Privacy Policy was last updated on November 26, 2013 and is subject to change at any time.

FACTS	WHAT DOES AFFINION BENEFITS GROUP, LLC DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and income • Your name, address, and telephone number • Your birthdate and account transactions <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Affinion Benefits Group chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does Affinion Benefits Group share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes — to offer our products and services to you	YES	NO
For joint marketing with other financial companies	NO	WE DO NOT SHARE
For our affiliates' everyday business purposes — information about your transactions and experiences	NO	WE DO NOT SHARE
For our affiliates' everyday business purposes — information about your creditworthiness	NO	WE DO NOT SHARE
For our affiliates to market to you	NO	WE DO NOT SHARE
For nonaffiliates to market to you	NO	WE DO NOT SHARE

Call us toll-free at 800-251-2311 or e-mail us at GLBPolicy@abgbenefits.com.

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Who we are	
Who is providing this notice?	Affinion Benefits Group, LLC

What we do	
How does Affinion Benefits Group protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Affinion Benefits Group collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account or provide account information • Give us your contact information • Pay insurance premiums or file an insurance claim <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Our affiliates may include companies with an Affinion name and others, such as insurance companies, loyalty and membership product service providers, and data processors.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Affinion Benefits Group does not share with nonaffiliates so they can market their products to you.</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Maintaining the Security of Your Information

We attempt to provide for the secure transmission of your information from your computer to our servers by utilizing encryption software. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and Affinion Benefits Group, and Affinion Benefits Group and you, will be free from unauthorized access by third parties, such as hackers.

Servicesinsync.com utilizes Standard SSL encryption on pages where secure information is transmitted over the Internet. We also use VeriSign as our Certificate of Authority. If you would like more information on the Services in Sync Basic VeriSign Certificate, go to servicesinsync.com.



CERTIFIED
ENTERPRISE

In addition to employing these high-security measures, we have undergone a rigorous certification process for Cybertrust Corporation's Web Certification program. This process examined in great detail every aspect of our security precautions, and included an on-site inspection of our facility for physical security and policy, plus a remote assessment of our potential vulnerabilities to web-based attacks. Cybertrust's certification is a continuous process, repeated and renewed annually.

Cookies

"Cookies" are pieces of information that may be placed on your computer by a Web site for the purpose of facilitating and enhancing your communication and interaction with that Web site. Almost all Web sites use cookies for these purposes.

We may use cookies (a) to customize your visit to the Services in Sync Basic Web site, (b) to deliver content consistent with your stated interests and the manner in which you browse and/or buy on our site, (c) to save your password (if you have registered with us) so you don't have to re-enter it each time you visit our site, and (d) for other purposes to make your visit more convenient.

At times, some of our advertisers or their ad serving and tracking providers may set cookies when you select their ad banner and some of our content providers or partners may also set cookies when you visit those portions of our site over which they have control. We reserve the right to supplement the cookie data which we collect from you with information collected by cookies set by third parties in order to understand how you use the Internet and what products are of interest to you. The information that we receive from these third parties is only aggregate, non-personally identifiable information.

You may stop or restrict the placement of cookies on your computer or flush them from your browser by adjusting your Web browser preferences, in which case you may still use our site, but it may interfere with some of its functionality. We do not use cookies to retrieve information from your computer for purposes other than as set forth in this Online Privacy Policy.

Our systems do not respond to "do not track" signals. We do not permit other parties to collect personally identifiable information about your online activities over time and across different Web sites when you use the Services in Sync Basic Web site or service.

Clickstream

As you use the Internet, a trail of electronic information is left at each Web site you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a Web site's server. Clickstream data can tell us the type of computer and browsing software you use, the address of the Web site from which you linked to the mymembersmarketplace.com Web site, and, in some instances, your e-mail address. We may use clickstream data to determine how much time visitors spend on each page of our site, how visitors navigate throughout the site and how we may tailor our Web pages to better meet the needs of visitors. This information will only be used to improve the mymembersmarketplace.com Web sites. Any collection or use of clickstream data will be anonymous and aggregate, and will not contain any personal information.

Internet Protocol (IP) Address

We may use your IP address to help diagnose problems with our server and to administer our Web site. Your IP address may also be used to help identify you and to gather demographic information. In addition, your IP address may be linked to your personally identifiable information while you are in the process of making a purchase and be retained by us with other information we collect and retain about you in connection with your Services in Sync membership.

Consent to Processing

By providing any information to the Services in Sync Basic Web site, you fully understand and unambiguously consent to the collection and processing of such information in the United States.

Links to Other Sites

The Services in Sync Web sites may contain links to other sites. Other sites may also reference or link to the Services in Sync Web sites. Affinion Benefits Group is not responsible for the privacy practices or the content of such other sites.

Treatment of Information of Former Members and Customers

We will continue to follow our online privacy policy for your personally identifiable information even when you are no longer a member or other customer of our business.

Your Acceptance of this Policy

By using this site, you signify your assent to our Online Privacy Policy. If you do not agree with the terms of this Online Privacy Policy, please do not use the Services in Sync Basic Web site. This Online Privacy Policy supersedes all privacy policies and other similar standards previously issued by us. This Online Privacy Policy is subject to updates and other changes from time to time. In the event of such changes, we will notify all of our members and customers of such changes in the manner and to the extent required by law. Your continued use of this site following the posting of changes to this Online Privacy Policy means you accept such changes.