

Privacy Policy

Protecting Your Privacy

Your privacy is important to us. Life Settlement Administrators (LSA) pledges to be responsible when gathering your personal information and to protect your privacy. Although this Privacy Policy is not a contract and does not create any legal rights, it does serve as an expression of LSA's commitment to protecting private personal information.

This Privacy Policy should answer your questions about the sources and kinds of information we collect, how we use it, when it may be shared with others, and how we safeguard its confidentiality and security. We also provide you with ways to correct the data you provide us and to limit our sharing of this data with third parties.

Information We Collect and How We Collect It

In order to facilitate the services we provide you and manage our business, we collect and maintain personal information about you. LSA collects customer information from many sources to understand and meet your needs. We collect personal information about you from:

- You, when you voluntarily provide us with information;
- Your browser, when you visit our website and your browser interacts with us; and
- Your transactions with any of the Charles M. Edwards Company, Inc. companies.

The personal information we collect about you through these various sources may include, but is not limited to:

- Name, addresses and telephone numbers
- Email addresses, fax numbers and cell phone numbers
- Credit/debit card numbers, associated billing addresses, and expiration dates

How Your Information Will Be Used

LSA uses personally identifiable information to complete transactions and fulfill requests for our services. LSA requires you to provide personal information when paying for services through our lifesettlementadmin.com website. In addition to processing, confirming and fulfilling the services requested, LSA may use this data for administrative and other purposes such as information systems management, accounting, billing and audits, marketing, credit card processing and verification, customer-relations correspondence, and/or operation of the LSA support services.

To the extent required by law, we may disclose personally identifiable information to government authorities, or to third parties pursuant to a subpoena or other legal process, and we may also use or disclose your information as permitted by law to protect the rights or property of LSA, Charles M. Edwards Company, Inc., our customers, our website, or its users.

LSA does not sell any customer information or share your email address with third parties except in compliance with this policy. However, we may disclose customer information to companies affiliated with LSA and/or unaffiliated third parties to fulfill the services you have requested. Additionally, LSA may combine the information we receive from you with information collected from other sources. This information would be used to provide offers and/or services specifically tailored to your interests.

If we sell a business unit to another company and your personal data is used by that business unit, then your data may be transferred to the buyer along with the business for them to use in the same way.

How You Can Opt Out of Marketing Communications and Sharing of Your Information With Third Parties

If you do not want LSA to use or share your personal information for the purpose of sending you marketing or promotional materials, please [click on this link to opt-out](#). Your request will be handled promptly but you may still receive marketing communications that were already in process prior to receipt of your request. You may also contact [LSA Customer Service](#) to submit your request. Please note that you will continue to receive LSA program updates and email services for which you have subscribed. If you are not a client of LSA, you may click [here](#) to join LSA and register your preferences, or send an email with UNSUBSCRIBE in the subject to opt-out@lifesettlementadmin.com from the address you wish to unsubscribe. In addition, all marketing emails from LSA will have a valid opt-out link in

Privacy Policy

the body of the message. Please be aware that unsubscribing by email will unsubscribe all users at this address, even if they are registered LSA clients with registered preferences.

Security

Information Security is important at LSA. We maintain strict physical, electronic and procedural safeguards to protect personal information and we regularly review our security standards and procedures to protect against unauthorized access to personal information.

While LSA takes reasonable steps to safeguard and to prevent unauthorized access to your private information, we cannot be responsible for the acts of those who gain unauthorized access, and we make no warranty, express, implied, or otherwise, that we will prevent unauthorized access to your private information. IN NO EVENT SHALL LSA, CHARLES M. EDWARDS COMPANY, INC., OR ITS AFFILIATES BE LIABLE FOR ANY DAMAGES (WHETHER CONSEQUENTIAL, DIRECT, INCIDENTAL, INDIRECT, PUNITIVE, SPECIAL OR OTHERWISE) ARISING OUT OF, OR IN ANY WAY CONNECTED WITH, A THIRD PARTY'S UNAUTHORIZED ACCESS TO YOUR INFORMATION, REGARDLESS OF WHETHER SUCH DAMAGES ARE BASED ON CONTRACT, STRICT LIABILITY, TORT OR OTHER THEORIES OF LIABILITY, AND ALSO REGARDLESS OF WHETHER LSA WAS GIVEN ACTUAL OR CONSTRUCTIVE NOTICE THAT DAMAGES WERE POSSIBLE.

Links to Other Sites

We would also like to remind visitors that we provide additional links to resources we think you will find useful. These links will lead you to sites that are not affiliated with LSA and may operate under different privacy practices. Our visitors are responsible for reviewing the privacy statements for such other websites, as we have no control over information that is submitted to these companies.

Contacting Us

If you have other questions, comments or concerns about our privacy practices, please contact our Chief Privacy Officer at lsa.privacy@lifesettlementadmin.com. If you would like us to remove all the personal data we hold about you from our records, please email customerservice@lifesettlementadmin.com. Please note, however, that we require certain key information from you in order to provide you with services and if you ask us to remove all or part of such information, we may choose to terminate the services we provide you under the [LSA Licensing and Servicing Agreement](#).

Privacy Modifications

LSA reserves the right to change this Privacy Policy at any time and will notify users of any material changes by updating the policy here and by including a "NEWLY UPDATED" label with the "PRIVACY POLICY" link on the websites governed by this policy for 30 days after any material changes are made. This policy was last updated on March 15, 2009.

Anti-Spam Policy

This statement applies to the websites and services that display or link to this notice ("services"). LSA prohibits the use of the services in any manner associated with the transmission, distribution or delivery of any unsolicited bulk or unsolicited commercial email ("Spam").

You may not use any services to send Spam. You also may not deliver Spam or cause Spam to be delivered to any of LSA's services or customers.

In addition, email sent, or caused to be sent, to or through the services may not:

1. use or contain invalid or forged headers;
2. use or contain invalid or nonexistent domain names;
3. employ any technique to otherwise misrepresent, hide or obscure any information in identifying the point of origin or the transmission path;
4. use other means of deceptive addressing;

Privacy Policy

5. use a third party's Internet domain name, or be relayed from or through a third party's equipment, without permission of the third party;
6. contain false or misleading information in the subject line or otherwise contain false or misleading content;
7. fail to comply with additional technical standards described below; or
8. otherwise violate the applicable LSA Licensing and Servicing Agreement for the services.

LSA does not authorize the harvesting, mining or collection of email addresses or other information from or through the services. LSA does not permit or authorize others to use the services to collect, compile or obtain information about LSA's clients, including but not limited to email addresses, which are LSA's confidential and proprietary information. Use of the services is also subject to the applicable Privacy Policy and LSA Licensing and Servicing Agreement.

LSA does not permit or authorize any attempt to use the services in a manner that could damage, disable, overburden or impair any aspect of any of the services, or that could interfere with any other party's use and enjoyment of any service.

If LSA believes that unauthorized or improper use is being made of any service, it may, without notice, take such action as it, in its sole discretion, deems appropriate, including blocking messages from a particular Internet domain, mail server or IP address. LSA may immediately terminate any account or service which it determines, in its sole discretion, is transmitting or is otherwise connected with any email that violates this policy.

Nothing in this policy is intended to grant any right to transmit or send email to, or through, the services. Failure to enforce this policy in every instance does not amount to a waiver of LSA's rights.

Unauthorized use of the services in connection with the transmission of unsolicited email, including the transmission of email in violation of this policy, may result in civil, criminal, or administrative penalties against the sender and those assisting the sender.