



PRIVACY POLICY OF Global Power Networks LP and all related Websites

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We may use your information for on-line and off-line marketing purposes, including but not limited to text messaging, SMS, e-mail marketing, telemarketing, and direct mail.

BY VISITING THIS WEBSITE AND REQUESTING INFORMATION, PRODUCTS OR SERVICES THEREON, YOU AGREE TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT PROVIDE ANY INFORMATION OR USE ANY OF THE SERVICES OR PRODUCTS OFFERED OR PROVIDED ON ANY OF THE WEBSITES REFERRED TO IN THIS PRIVACY POLICY.

PLEASE NOTE: THIS PRIVACY POLICY CHANGES FROM TIME TO TIME AND CHANGES ARE EFFECTIVE UPON POSTING. PLEASE CHECK BACK FREQUENTLY FOR UPDATES AS IT IS YOUR SOLE RESPONSIBILITY TO BE AWARE OF CHANGES. WE DO NOT PROVIDE NOTICES OF CHANGES IN ANY MANNER OTHER THAN BY POSTING THE CHANGES AT THIS WEB SITE.

This policy describes the information collection, use, and dissemination practices of Global Power Networks LP, ("Global Power Networks") and applies to Global Power Networks' collection, use, storage and disclosure of information by Global Power Networks on its (a) websites, including all its divisions, subsidiaries and related companies (collectively, the "Websites"), (b) on various Third Party websites, and (c) to Global Power Networks' other information collection, including the purchase of customer lists from Third Parties. Global Power Networks is not responsible for the information collection or privacy practices of Third Party websites or applications.

CALIFORNIA RESIDENTS PRIVACY RIGHTS

Companies that collect personally identifiable information ("PII") from California residents and disclose such information to Third Parties (including affiliated entities) for marketing purposes must, in response to a request by a consumer, either (1) provide a list detailing the categories of information shared and the entities to which such information was provided, or (2) provide a mechanism by which a consumer may opt-out of having their information shared with Third Parties. We have elected the second option and you may request that your PII not be shared with Third Parties by sending your request, including your full name, e-mail address and postal address to: clientservice@gpncenter.com. In accordance with California Civil Code Sec. 1789.3, California resident users are entitled to know that they may file grievances and complaints with California Department of Consumer Affairs, 400 R Street, Suite 1080, Sacramento, CA 95814; or by phone at 916-445-1254 or 800-952-5210; or by e-mail to dca@dca.ca.gov.

Global Power Networks' PRACTICES FOR THE COLLECTION, USE AND DISSEMINATION OF INFORMATION

1. Collection of Information

1.1 Survey Information

Global Power Networks collects information from individuals by various methods, including, but not limited to, when an individual voluntarily completes a survey, order form, or a registration

page either online or offline, or by means of online or offline surveys, order forms, or registration pages operated by Third Parties (collectively, a "Survey"). (As used herein, "online" means using the Internet, including the Websites, and related technologies, and "offline" means by methods other than online, including in person, in the postal mail, using telephones and cell phones, and other similar means.) In the Surveys, Global Power Networks or a Third Party (a "Third Party") may ask an individual to provide various information to Global Power Networks, which may include his or her name, e-mail address, street address, zip code, telephone numbers (including cell phone numbers and carriers), birth date, gender, salary range, education and marital status, occupation, social security number, employment information, personal and online interests, and such other information as may be requested from time to time (together, "Survey Information"). Global Power Networks may also collect information concerning an individual from another source and uses that information in combination with information provided from this web site. Completing the Surveys is completely voluntary, and individuals are under no obligation to provide Survey Information to Global Power Networks or Third Party, but an individual may receive incentives from Global Power Networks or a Third Party in exchange for providing Survey Information to Global Power Networks.

1.2 Site Membership or Registration

To the extent registration is required to receive e-mail and possibly postal communications from Global Power Networks, this Privacy Policy also applies to consumers that have agreed to receive e-mail marketing from Global Power Networks, whether at our Website, via e-mail, on Third Party websites or otherwise. We collect information in certain portions of our Website, where guests provide content submissions and suggestions or participate in interactive online activities (i.e., by way of responding to questions and surveys, community listings, ratings, searches and comparison searches, bidding, purchasing, chat, games, or bulletin boards, etc.). The personal profile information you submit to Global Power Networks remains your property, but by submitting that information to Global Power Networks, you grant Global Power Networks, the right to use that information for marketing purposes. Global Power Networks may also use such information for content improvement and feedback purposes. We may sell the personal information that you supply to us and we may join together with various other businesses to bring selected retail opportunities to our members. In addition, Global Power Networks reserves the right to release current or past member information in the event Global Power Networks believes that the membership is being or has been used in violation of the Rules or to commit unlawful acts, if the information is subpoenaed, if Global Power Networks is sold or acquired, or when Global Power Networks deems it necessary or appropriate. By agreeing to these terms, you hereby consent to disclosure of any record or communication to any Third Party when Global Power Networks, in its sole discretion, determines the disclosure to be appropriate.

"Subscription" occurs when an end-user registers for Global Power Networks' services, either via registration at our website, via co-registration at a marketing partner's website, or via a permission pass / opt-out / no-opt mailing. Global Power Networks collects personally identifiable information about our subscribers, based on: information gathered at the time of registration, subscriber interaction and response to subsequent electronic mailings and website use, information provided by marketing partners, and information appended from data aggregators. Information collected may include, but is not necessarily limited to: name, e-mail address, postal address, gender, birth date, telephone number, activity, interests, user behavior and other demographic information. This information enables us to better tailor our content to subscribers' needs and to help our clients to promote and sell their products and services.

1.3 Third Party List Information

Global Power Networks collects information from individuals when an individual provides information to a Third Party and Global Power Networks subsequently purchases, licenses, or otherwise acquires the information from the Third Party (the "Seller"). Such purchased information may include, but is not limited to, an individual's name, e-mail address, street

address, zip code, telephone numbers (including cell phone numbers and carriers), birth date, gender, salary range, education and marital status, occupation, industry of employment, personal and online interests, and such other information as the individual may have provided to the Seller (together, "Third Party List Information"). When acquiring Third Party List Information, Global Power Networks seeks assurances from the Seller that the Seller has a right to transfer the Third Party List Information to Global Power Networks and that the Seller has a right to provide offers from Advertisers to the individuals whose personal information is included on the Seller's list.

1.4 Other Information.

Other occasions when Global Power Networks obtains information from individuals include (1) when an individual is making a claim for a prize or seeking to redeem an incentive offered by Global Power Networks or by a Third Party, (2) when an individual requests assistance through Global Power Networks' customer service department, and (3) when an individual voluntarily subscribes to a Global Power Networks service or newsletter (together, "Other Information").

1.5 Cookies, Web Beacons, and Other Info Collected Using Technology

Global Power Networks reserves the right to use cookies and web beacon technology to associate certain Internet-related information about an individual with information about the individual in our database. Additionally, Global Power Networks may use other new and evolving sources of information in the future (together, "Technology Information").

(a) Cookies

A cookie is a small amount of data stored on the hard drive of the individual's computer that allows Global Power Networks to identify the individual with his or her corresponding data that resides in Global Power Networks' database. You may read more about cookies at <http://cookiecentral.com>. Individuals who use the Websites need to accept cookies in order to use all of the features and functionality of the Websites.

(b) Web Beacons

A web beacon is programming code that can be used to display an image on a web page (by using an `` programming function -- see <http://truste.org> for more information), but can also be used to transfer an individual's unique user identification (often in the form of a cookie) to a database and associate the individual with previously acquired information about an individual in a database. This allows Global Power Networks to track certain websites an individual visits online. Web beacons are used to determine products or services an individual may be interested in, and to track online behavioral habits for marketing purposes. For example, Global Power Networks might place, with the consent of a Third Party website, a web beacon on the Third Party's website where cosmetics are sold. When Jane, an individual listed in Global Power Networks' database, visits the cosmetic website, Global Power Networks receives notice by means of the web beacon that Jane visited the cosmetics site, and Global Power Networks would then update Jane's profile with the information that Jane is interested in cosmetics. Global Power Networks may thereafter present offers of cosmetic related products and services to Jane. In addition to using web beacons on web pages, Global Power Networks may also use web beacons in e-mail messages sent to individuals listed in Global Power Networks' database.

(c) New Technology

The use of technology on the Internet, including cookies and web beacons, is rapidly evolving, as is Global Power Networks' use of new and evolving technology. As a result, Global Power Networks strongly encourages individuals to revisit this policy for any updates regarding its use of technology.

(d) Usage Tracking

Global Power Networks tracks information related to the electronic mailings and web pages viewed by users and subscribers, as well as the hyperlinks clicked by subscribers, while viewing our e-mails or visiting our websites.

(e) Log Files.

Log files are used to track and monitor subscriber usage.

(f) Optional Registration

Global Power Networks may offer free voluntary registration to potential subscribers. During such registration, the subscriber is required to supply an e-mail address and other personal information. This information is required if the subscriber wants to participate in Company services.

(g) Feedback and Inquiries

You have the ability to contact Global Power Networks to provide us with your feedback. Global Power Networks uses this information to respond to you and analyze customer service issues.

1.6 Outside Information

Global Power Networks may receive information about individuals from Third Parties or from other sources of information outside of Global Power Networks including information located in public databases ("Outside Information").

1.7 Individual Information

As used herein, Individual Information means Survey Information, Third Party List Information, Other Information, Technology Information, and Outside Information, and any other information Global Power Networks gathers or receives about individuals.

1.8 No Information Collected from Children

Global Power Networks will never knowingly collect any personal information about children under the age of 18. If Global Power Networks obtains actual knowledge that it has collected personal information about a child under the age of 18, that information will be immediately deleted from our database. Because it does not collect such information, Global Power Networks has no such information to use or to disclose to Third Parties. Global Power Networks has designed this policy in order to comply with the Children's Online Privacy Protection Act ("COPPA").

1.9 Credit Card Information

Global Power Networks may in certain cases collect credit card numbers and related information, such as the expiration date of the card ("Credit Card Information") when an individual places an order from Global Power Networks. When the Credit Card Information is submitted to Global Power Networks, such information is encrypted and is protected with SSL encryption software. Global Power Networks will use the Credit Card Information for purposes of processing and completing the purchase transaction, and the Credit Card Information will be disclosed to Third Parties only as necessary to complete the purchase transaction.

1.10 Links to External Websites

Global Power Networks' e-mails and websites may contain links to external websites. You will be taken to external websites if you click on these links. Your information may be passed from Global Power Networks' database to the external website, and/or external database, for your convenience (e.g. your information may be used to pre-fill a form at a destination website). Global Power Networks is not responsible for the privacy practices or content of any external website owner. We encourage you to review the privacy policy of any website you visit.

2. Use of Individual Information

2.1 Discretion to Use Information

Global Power Networks MAY USE INDIVIDUAL INFORMATION FOR ANY LEGALLY PERMISSIBLE PURPOSE IN COMPANY'S SOLE DISCRETION.

The following paragraphs in Section 2 describe how Global Power Networks currently uses Individual Information, but Global Power Networks may change or broaden its use at any time. As noted below, Global Power Networks may update this policy from time to time. Global Power Networks may use Individual Information to provide promotional offers to individuals by means of e-mail advertising, telephone marketing, direct mail marketing, online banner advertising, and package stuffers, among other possible uses.

2.2 E-mail and Unsubscribe Policy

Global Power Networks uses Individual Information to provide promotional offers by e-mail to individuals. Global Power Networks may maintain separate e-mail lists for different purposes. If e-mail recipients wish to end their e-mail subscription from a particular list, they need to follow the instructions at the end of each e-mail message to unsubscribe from the particular list. To unsubscribe from all Global Power Networks' e-mail lists, a person must send an e-mail to clientservice@gpncenter.com.

Global Power Networks' unsubscribe process impacts only the future delivery of electronic mailings disseminated by Global Power Networks on its own behalf. You may still receive electronic mailings sent on behalf of Third Parties and your personal information may still be shared with Third Parties for use in offline marketing and data appends, including e-mail appends.

You should also note that unsubscribing from Global Power Networks' electronic mailings will not automatically unsubscribe the subscriber's information from any Third Party associates and licensees of the data. Since Third Party associates and licensee partners maintain separate databases from Global Power Networks, and you will need to unsubscribe from each source individually, if desired. This allows you the freedom to pick and choose which subscriptions to maintain and which to discontinue.

2.3 Content of E-mail Messages

In certain commercial e-mail messages sent by Global Power Networks, an Advertiser's name will appear in the "From:" line but hitting the "Reply" button will cause a reply e-mail to be sent to Global Power Networks. The "Subject:" line of Global Power Networks e-mail messages will usually contain a line provided from the Advertiser to Global Power Networks.

2.4 Solicited E-mail

Global Power Networks only sends e-mail to individuals who have agreed on the Websites to receive e-mail from Global Power Networks or to individuals who have agreed on Third Party websites to receive e-mail from Third Parties such as Global Power Networks. Global Power Networks does not send unsolicited e-mail messages. As a result, statutes requiring certain formatting for unsolicited e-mail are not applicable to Global Power Networks' e-mail messages.

2.5 Targeted Advertising

Global Power Networks uses Individual Information to target advertising to an individual. When an individual is using the Internet, Global Power Networks uses Technology Information (see also Section 2.7 below) to associate an individual with that person's Individual Information, and Global Power Networks attempts to show advertising for products and services in which the person has expressed an interest in the Surveys, indicated an interest by means of Technology Information, and otherwise. Global Power Networks may, at its discretion, target advertising by using e-mail, direct mail, telephones, cell phones, and other means of communication to provide promotional offers.

2.6 Direct Mail and Telemarketing

Global Power Networks may use Individual Information to advertise, directly or indirectly, to individuals using direct mail marketing or telemarketing using telephones and cell phones.

2.7 Use of Technology Information

Global Power Networks uses Technology Information (1) to match a person's Survey Information and Third Party List Information to other categories of Individual Information to make and improve profiles of individuals, (2) to track a person's online browsing habits on the Internet, (3) to determine which areas of Global Power Networks' websites are most frequently visited. This information helps Global Power Networks to better understand the online habits of individuals so that Global Power Networks can target advertising and promotions to them.

2.8 Profiles of Individuals

Global Power Networks uses Individual Information to make a profile of an individual. A profile can be created by combining Survey Information and Third Party List Information with other sources of Individual Information such as information obtained from public databases.

2.9 Storage of Individual Information

Global Power Networks stores the Individual Information in a database on its' computers. Our computers have security measures (such as a firewall) in place to protect against the loss, misuse, and alteration of the information under Global Power Networks' control. Notwithstanding such measures, Global Power Networks cannot guarantee that its security measures will prevent its computers from being illegally accessed, and the Individual Information on them stolen or altered.

3. Dissemination of Individual Information

3.1 Sale or Transfer to Third Parties

Global Power Networks MAY SELL OR TRANSFER INDIVIDUAL INFORMATION TO THIRD PARTIES FOR ANY PURPOSE IN Global Power Networks' SOLE DISCRETION.

3.2 Order Fulfillment

Global Power Networks will transfer Individual Information to Third Parties when necessary to provide a product or service that a person orders from such Third Party while using Global Power Networks' websites or when responding to offers provided by Global Power Networks.

3.3 Legal Process

Global Power Networks may disclose Individual Information to respond to subpoenas, court orders, and other legal processes.

3.4 Summary Data

Global Power Networks may sell or transfer non-individualized information, such as summary or aggregated anonymous information about all persons or sub-groups of persons.

3.5 Access

Individuals have access to their Individual Information collected to provide an opportunity for an individual to correct, amend, or delete such information. Access can be obtained by contacting clientservice@gpncenter.com. Global Power Networks may also grant advertising clients and e-mail services providers' access to an individual's e-mail address to verify the origin of the Individual Information collected.

3.6 Do Not Call Registry Waiver

Even though you may be on a National, Provincial, or State DO NOT CALL list, by submitting your contact information, which may include your telephone number, you are expressly authorizing us and our advertising businesses and affiliates to contact you by telephone at the number you have used regarding the information you have expressed.

4. Privacy Practices of Third Parties

4.1 Advertiser cookies and web beacons

Advertising agencies, advertising networks, and other companies (together, "Advertisers") who place advertisements on the Websites and on the Internet generally may use their own cookies, web beacons, and other technology to collect information about individuals. Global Power Networks does not control Advertisers' use of such technology and Global Power Networks has no responsibility for the use of such technology to gather information about individuals.

4.2 Links

The Websites and e-mail messages sometimes contain hypertext links to the websites of Third Parties. Global Power Networks is not responsible for the privacy practices or the content of such other websites. Linked websites may contain links to websites maintained by Third Parties. Such links are provided for your convenience and reference only. Global Power Networks does not operate or control in any respect any information, software, products or services available on such Third Party websites. The inclusion of a link to a website does not imply any endorsement of the services or the site, its contents, or its sponsoring organization.

4.3 Affiliated Companies

Global Power Networks may disclose, transfer, and sell Individual Information to entities affiliated with Global Power Networks in Global Power Networks' discretion.

5. Unsubscribe Procedures

If you wish to discontinue receiving e-mail messages from Global Power Networks, you have several options:

- (a) Unsubscribe from one e-mail list

To unsubscribe from a particular list, either (1) send an e-mail to clientservice@gpncenter.com or (2) follow the instructions in each promotional e-mail message sent by Global Power Networks.

(b) Unsubscribe from all of Global Power Networks' e-mail lists

We reserve the right to add Individual Information to multiple lists maintained by Global Power Networks. To globally unsubscribe from all of Global Power Networks' lists, send an e-mail to clientservice@gpncenter.com.

For more information about protecting your privacy, you may wish to visit: www.ftc.gov.

If you any have questions about this policy, please contact us at clientservice@gpncenter.com.