

Cotton Systems Ltd. and Cotton Coach Inc.

Privacy Statement

Last revised November 9, 2012

This privacy statement discloses the privacy practices of Cotton Systems Ltd. and Cotton Coach Inc. herein referred to as “the Corporations” and is directed to visitors of our websites. By using these websites, you consent to the information practices described in this Privacy Statement.

The Corporations named above are committed to your right to privacy. As a visitor to our websites or user of our products and services, you deserve the ability to control the uses of your personal information.

The Corporations agree to notify you of the following:

1. What personally identifiable information of yours or third party personal identification is collected from you through the following web site domains registered to:
<http://advisorgrowthday.com>, <http://agencybuildingevent.com>,
<http://agencyroadblocks.com>, <http://askwaynecotton.com>, <http://cottoncoach.com>,
<http://cottonsystems.com>, <http://mycapabilitygap.com>, <http://nobrowndays.com>,
<http://precisiongrowth.com>, <http://precisionlaunch.com>, <http://precisionleader.com>,
<http://precisionmarketingapproach.com>, <http://prestigebrochures.com>,
<http://sageevent.com>, <http://scienceofreferrals.com>, <http://thecottonsystem.com>,
<http://yaleevent.com>.
2. The organization collecting the information
3. How the information is used
4. With whom the information may be shared
5. What choices are available to you regarding collection, use and distribution of the information
6. The kind of security procedures that are in place to protect the loss, misuse or alteration of information under The Corporations’ control
7. How you can correct any inaccuracies in the information.

If you feel that the Corporations are not abiding by this posted privacy policy, you should contact us immediately with your concerns addressed to [**bcotton@cottonsystems.com**](mailto:bcotton@cottonsystems.com).

We collect information from our users at several different points on our websites to enable us to better inform you about our products and services. By knowing your preferences we can deliver relevant information that meets your needs and ensure that your visit to our site is informative and productive. The Corporations are the sole owners of the information collected on its’ respective sites. We will not sell, share, or rent this information to others in ways different from what is disclosed in this statement.

The Corporations will not obtain personally identifiable information about you unless you choose to provide such information. If you choose not to register and provide personal information, you can still use the public areas of the website.

The Corporations will not disclose personal information you provide, except as follows:

- To assist the Corporations in evaluating their programs and to continue to improve the quality of your on-line experience;
- When disclosure is required by law, such as pursuant to court order, subpoena, legal process, or government agency examination or investigation, or to protect or enforce our rights;
- In connection with bonafied corporate due diligence and audits
- To working alliances or vendor partners required solely for the purposes of completing your purchase or request for shipment of our products or items related to service. Such distribution and fulfillment detail will include your name, address, telephone and email address as provided in the Ship To area of your account.
- Email addresses may also be used to contact you for various purposes, such as to send you information about new products, system enhancements, surveys, and special events. You may opt out of this use of your email address by contacting us via email. Each email you receive will provide you with this option.
- Your email address will not be shared with any third parties except as required by our vendor partners we select in order to provide you with an email confirmation of the shipment of your order(s) or request(s) for information. Your personal information will be provided solely for the purposes of shipping requirements and information required to generate fulfillment of your orders and request.

Third Parties

The Corporations do not sell or rent your personal information to anyone. Except as otherwise described in this Privacy Statement, personal information you provide on this site will not be shared outside of the Corporations and our controlled subsidiaries and affiliates without your permission. We occasionally hire other companies to provide limited services on our behalf, including shipping products and product information to you, sending postal mail, emailing shipping confirmation details to you, and processing event registrations or payments. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

Registration

In order to use some functions on this website, a user must first complete a registration form. During registration, the user is required to give their contact information (such as name and email address). This information is used to contact the user about the services on our site for which they have expressed interest, to deliver, bill and collect for products and services purchased on the Corporations websites.

The Corporations do not share any personally identifiable or private customer information submitted online with third parties except as expressed in this document for the purposes of fulfilling our shipments. Demographic information may also be requested (such as zip code or

type of business). This information may be stored, analyzed and used to assist us to improve our services.

Aggregate Information

Aggregate information refers to information your computer automatically provides to us, and that cannot be tied back to you as a specific individual, such as referral data (the websites you visited just before and just after our website), the date and time of your visits, the pages viewed, time spent at our website, the browser and platform you use, and IP addresses. We use this data to create aggregate reports on user demographics and traffic patterns for the purpose of system administration and improving the web sites to better serve our users.

Cookies

The Corporations use "cookies" to help you personalize your online experience. A cookie is a small text file that is placed on your hard disk by a web server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. Cookies enable us to track and target the interests of our users to simplify and enhance the experience on our site (i.e. pre-filling forms similar to those you may have already completed). Once the user closes their browser, the cookie information is no longer available through our server. You can set your browser to notify you when you receive a cookie, giving you the opportunity to decide whether to accept it. If a user rejects the cookie, they can still use our site.

Log Files

We use IP addresses in log files to analyze trends, administer the site, track a user's movements, and gather broad demographic information for aggregate use. Log files do not enable us to access personally identifiable information, such as email addresses.

Links

This website may contain links to other sites not related to The Corporations. Please be aware that the Corporations are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected at this website and to any The Corporations web site.

Online Classes and Special Events

The Corporations offer our web site visitors an opportunity to participate in live and pre-recorded online classes or special events which are hosted by online meeting providers. The Corporations retain the right to change online meeting providers as it sees fit in an effort to ensure a positive viewing experience for our customers and prospective customers.

Registration is required by participants by clicking on a link to attend and take part in each online class or special event. The information collected at the time of registration (such as name, address, e-mail address) enables us to contact the participant with password and login information for the online class or special event.

Additionally, registrants may be contacted by phone to ensure that they have the needed information for attending the online class or special event. The participant is given an opportunity to opt-in to receive future e-mails about education, products, services and events either by phone or via on-line surveys. A user may opt-out of being contacted in the future by emailing info@cottonsystems.com with their request to delete them from the online class or

special event email listing or by clicking on the unsubscribe option attached to email communication forwarded to you.

Electronic Newsletters

If a user wishes to subscribe to our electronic magazines and newsletters they must provide The Corporations with permission by choosing to opt in for this service. At the point that the user chooses to opt in, we ask for contact information such as name and email address. Users who no longer wish to receive our newsletter can unsubscribe when they receive it by clicking on the link at the bottom of the newsletter. The user will then be given an opportunity to opt in or out of future newsletters, and opt in or out of further periodic The Corporations communications.

Email forwarding functionality is provided in the newsletter. Using this functionality will forward the newsletter privately. However, if you use other forwarding methods, like those provided in your email client, they may transfer personally identifiable information. The Corporations are not responsible for personally identifiable information caused by the act of forwarding our material from one individual to another.

Public Forums

This site may choose to set up chat rooms forums, message boards, and/or news groups available for use by visitors to our website or to our customers and prospective customers regarding our products and services. Any information that is disclosed in these areas by the users of these systems becomes public information. You should always exercise caution when deciding to disclose your personal information.

Surveys

From time-to-time our site requests information from users via surveys. Participation in these surveys is completely voluntary. Users always have a choice whether or not to disclose their answers and information. Information requested may include contact information (such as name and address), and demographic information (such as post/zip code, age level). Survey information will be used for purposes of monitoring or improving the use and satisfaction of our websites and the products and services provided by The Corporations.

Children

The Corporations products and services are for use by advisors, agents, managers and management teams, agencies, home office executives, and businesses in the life insurance, financial services and investment companies in the financial services industry. We would not expect to deal with children under the age of 18, nor would we expect any child under the age of 18 to provide us with any personally identifiable information.

Referral Program

At this time, we do not promote an active referral program. If we choose to do so in the future, and if a customer joins our referral program and decides to refer a prospect as a part of that program, we will ask them to provide the prospect's name, company, title, phone, address (if available), as well as information about their relationship with the prospect. The referral program member can request a call from the sales representative prior to the prospect being contacted. The referral prospect may contact The Corporations at [**info@cottonsystems.com**](mailto:info@cottonsystems.com) to request the removal of this information from the Corporations' database.

Security

The Corporations takes precautions to protect our customers' information. When users submit sensitive information via the website, your information is protected both online and off-line using standard security best practices such as firewalls, encryption and intrusion detection. Full backups are performed every week on the entire file system and incremental backups are done daily. Finally, all hosted servers are kept physically secure in world-class hosting data centers.

Credit Cards

We do not currently accept credit card orders online. Do not forward your personal credit card information via email as we do not have security measures in place to protect such information. The Corporations will not be held liable for any credit card information you forward to us in an unsecured environment. At the point we institute online credit card orders, our web stores will provide you with secure measures to transact your orders.

Special Offers

We send all new registrants and customers a welcoming email to verify password and username. We send a request for confirmation of sign up to our electronic newsletters to those people who specifically sign up to request it. Visitors to our website will occasionally receive information on products, services and special offers. Out of respect for the privacy of our users, we present the option to not receive these types of communications. Please see "Opting Out" below

Updating Personal Information and Opting Out

We encourage our users to update our record of any personal information with changes (such as your phone number). Information can be corrected/updated on any registration form. Users can also opt out of our services by emailing a request to [**info@cottonsystems.com**](mailto:info@cottonsystems.com).

Changes to Privacy Policy

The Corporations will review and update this privacy policy from time to time and we reserve the right to do so. A "last revised" date will always be included on the top of the statement. To keep up-to-date with the The Corporations privacy policy, please check this page periodically. This statement and privacy policy is the only policy applicable to The Corporations

Contacting the Websites

If you have any questions about this privacy statement, the practices of the Corporations' websites, or your dealings with this Website, you can contact us at [**bcotton@cottonsystems.com**](mailto:bcotton@cottonsystems.com).