

## **PRIVACY POLICY**

### **INTRODUCTION**

Buffini & Company recognizes that your privacy and the protection of your personal information are important to you. This statement is intended to disclose how Buffini & Company uses and attempts to protect your personal information while using the Buffini & Company website. Buffini & Company allows new or existing clients or Members (which are referred to collectively in this Policy as "Clients") to enroll for events sponsored by Buffini & Company. In addition, Buffini & Company allows new or existing Clients to create a sign-in name and password for use in accessing those portions of the Buffini & Company website that are relevant to the goods or services purchased by the Client. Those Clients who have purchased any of the Coaching Solutions offered by Buffini & Company may access the Members' Area of the website, which includes various tools for goal setting and the tracking of financial results. Clients may also access and use the Buffini & Company website to purchase a license to participate in training programs such as Peak Producers® or Ultimate Recruiting Solution™ or to view content which is part of those programs. They may also access the website to use Referral Maker, Buffini & Company's CRM online service and software. By using the Buffini & Company website, you consent to the data practices described in this statement.

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### **COLLECTION OF INFORMATION BY BUFFINI & COMPANY**

Buffini & Company collects and processes personal information to enable it to authenticate Clients, to allow Clients or prospective Clients to enroll in events, to allow existing Clients to access the appropriate areas of the website and to facilitate the purchase of products. When you register with the Buffini & Company website you will be asked to provide certain personal information that will be stored in a profile maintained for you. The information requested will depend upon your reason for accessing the website. New or existing Clients who enroll for events, as well as new or existing Clients who purchase a license to use products or services, will be asked to provide their name, address, phone number, e-mail address, company, referral source, if any, as well as current credit or debit card information.

Existing Clients who access the Members' Area of the website will be asked to provide their name, as well as a user name and a password.

Clients may elect to use the goal setting and business tracking portions of Buffini & Company's website. Those portions of the website allow you to input your personal and business goals as well as information concerning the number of sales transactions you have made and the dollar volume of sales.

Members who use Referral Maker may input information about their client contacts. All such third party client information will be treated as personal information of the Client.

Your name, address, phone number, company name, and e-mail address will be stored on a directory of Buffini & Company Clients, which is generally available to authorized employees and agents of Buffini & Company.

Your other personal information, including your user name, password, goal setting, and financial information are maintained on Buffini & Company's secure internal servers. This information can only be accessed by Buffini & Company's IT personnel, Business Coaches, Corporate Relations, and Client Care.

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## **USE OF YOUR PERSONAL INFORMATION BY BUFFINI & COMPANY**

### **HOW BUFFINI & COMPANY WILL NOT USE YOUR PERSONAL INFORMATION.**

Buffini & Company **will not sell or rent your information** to third parties. Buffini & Company **will not disclose your personal information** to third parties without your prior consent, except as otherwise provided in this policy. At some of our events, however, third party companies that have sponsorship or other contractual relationships with Buffini & Company may ask for your business card or for permission to scan your attendee badge or otherwise capture your personal information. If you give your business card to a third party company or otherwise permit your attendee badge to be scanned or personal information to be captured, you are consenting to being contacted and marketed to by that company.

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### **HOW BUFFINI & COMPANY USES YOUR PERSONAL INFORMATION**

Buffini & Company uses your personal information for the operation and maintenance of your Buffini & Company account and to provide any product or service which you have purchased. For example, Buffini & Company uses your user name and password to allow you access to the appropriate area of the Buffini & Company website. Buffini & Company allows Coaches to access your goal setting and financial information for the purpose of assisting them in providing coaching services. Buffini & Company allows Client Care to access your user name and password to provide assistance with your account if needed.

Buffini & Company's Corporate Relations Department may access your business goals reflecting your volume of sales transactions and dollar volume of sales. Corporate Relations will not disclose this information, but may use it for marketing purposes by combining it with other Clients associated with large real estate companies to provide general information to those companies about the average sales volume or dollar volume of Clients associated with their companies. Any information provided will be of a general statistical nature and will not disclose the identity or information concerning any particular Buffini & Company Client.

In addition, Buffini & Company may enter into agreements with third party companies to provide assistance in analyzing its clients and their business operations, which may include personally identifiable information, to assist Buffini & Company in offering or providing products or services or to obtain and understand general metrics concerning the business of Buffini & Company clients. Any such disclosure will be under a non-disclosure agreement prohibiting any other use of the customer data provided.

Buffini & Company may also send you e-mails about events or products that Buffini & Company offers or makes available, or other issues deemed relevant by Buffini & Company. These periodic e-mails are considered essential to the provision of the service you have requested.

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### **GENERAL DISCLOSURE OF PERSONAL INFORMATION BY BUFFINI & COMPANY**

In general Buffini & Company will ONLY disclose your personal information to authorized agents or representatives of Buffini & Company for the purposes of providing the product or services which you have purchased. In general, and except as otherwise provided in this Privacy Policy, or unless otherwise authorized by your use of Buffini & Company services (for example, the Referral Directory), Buffini & Company will not disclose your personal information to other Buffini & Company Clients or to third parties.

Buffini & Company may disclose personal information if required to do so by law, or in the good faith belief that such action is necessary to: (a) conform to legal requirements or comply with legal process, (b) protect and defend the rights or property of Buffini & Company, or (c) act under exigent circumstances to protect the personal safety of Buffini & Company Clients or the public.

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#### **DISCLOSURE OF PERSONAL INFORMATION TO RELATED BUSINESSES**

From time to time, Buffini & Company establishes contractual relationships with real estate, mortgage or real estate servicing companies that promote products or services that may be purchased by an individual client. Those companies may be related to individual clients as franchisors, licensors, independent contractors or principals. Buffini & Company reserves the right to share personal information of a client with a related business of the client if Buffini & Company, in its sole and exclusive judgment and discretion, determines that there is a legitimate business purpose or need for the disclosure of such information.

Any client may elect to "opt out" of any disclosure of his/her personal information to a related business by contacting Buffini & Company Customer Service by phone or at [clientcare@buffiniandcompany.com](mailto:clientcare@buffiniandcompany.com).

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#### **MANAGING YOUR PERSONAL INFORMATION**

You can always add, update, or make changes to the information in your Buffini & Company profile.

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#### **SECURITY AND STORAGE OF YOUR PERSONAL INFORMATION**

A "cookie" is a very small text file that a website saves to your computer's hard disk to store information that you provide about yourself or to store your preferences. Buffini & Company permits, but does not require, the use of a cookie to improve your sign-on experience. For example, Buffini & Company may store your user name in a cookie that will remain on your computer after you sign out. This cookie allows your user name to be repopulated so that you will only need to type your password the next time you sign in.

In addition, we may disclose the presence of a cookie to third parties in order to advertise our services. We may also contract with third-party advertising networks that use cookies, or other tracking technologies to collect certain non-personal information about your activities on the website to offer you targeted advertising based upon your interests. We may also use cookies delivered by third parties to track the performance of our advertisements.

You can refuse to accept browser cookies by activating the appropriate setting on your browser. Most recent browsers provide the flexibility to reject all cookies, accept all cookies, or accept cookies only from sites you trust. Please note that if you refuse to accept browser cookies, your access to or use of certain portions of the website may be limited.

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#### **CHANGES TO THIS PRIVACY STATEMENT**

Buffini & Company may occasionally update this Privacy Statement. When we do, we will also revise the "last updated" date at the top and bottom of the Privacy Statement. Your continued

use of Buffini & Company products or services will be subject to the terms of the current Buffini & Company Privacy Policy.

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