



# Online Privacy Policy

**Last Updated: February 24, 2018**

Your privacy is important to us. This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use our online service and any other online services offered by APL INC that link to or reference this policy (collectively, our “online services”). This policy covers our commission accounting system, eAgentCenter, MyStmnt, eAPPS and MemberTrax, as well as any interactions you may have while viewing content provided through one of our digital communications.

As you review this Online Privacy Policy, here are a few general principles to keep in mind:

- Our online services are intended for a U.S. audience. If you visit or use one of our online services, your information will be transferred or processed in the United States.
- Our online services are not intended for anyone under 18. We do not knowingly collect personal information from anyone under 18.
- APL will not use and share any information that we collect from or about you in any way other than for commission distribution and tax reporting purposes.
- If you have questions after reviewing this policy, please contact [info@aplplus.com](mailto:info@aplplus.com).

## Information We Collect

### *Personal Information*

When you visit or use our online services, we may collect personal information from or about you such as your name, email address, mailing address, telephone number(s), account numbers, user name and password. We may also collect payment card information, social security numbers, employer tax identification numbers (on your Form W9) when you provide such information while using our online services and where we believe it is reasonably required for ordinary business purposes.

### *Usage and Other Information*

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, the type of operating system and browser you use.

We will not use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services.

### *Additional Sources of Information*

We may also collect information about you from additional online and offline sources including from payment change forms, direct deposit authorization forms or commercially available third-party sources, such as insurance carrier statements. We may combine this information with the personal and other information we have collected about you under this Online Privacy Policy.

## Use of Information

We use the information discussed above in a number of ways, such as:

- Processing applications and transactions;
- Processing your commissions;
- Verifying your identity (such as when you access your account information);
- Preventing fraud and enhancing the security of your account or our online services;
- Responding to your requests and communicating with you;
- Managing your preferences;
- Providing you tailored content messages;
- Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions);
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies; and
- For any other purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual) for various business purposes, where permissible under applicable laws and regulations.

## Disclosure of Information

We may share the information we collect from and about you with and other third parties. For example, we may share your information with:

- The company you are contracted to do business with. This company is always identified by the Company ID with our online services regulations;
- Other companies that provide you services, products or programs;
- The IRS for tax reporting;
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our clients or third parties.

We may share anonymous or aggregated information with third parties to help deliver products, services, and content that are better tailored to the users of our online services and for other purposes.

## Understanding Cookies, Web Beacons and Other Tracking Technologies

We or our service providers will not use cookies, web beacons, local shared objects and other tracking technologies.

## Online Advertising

You will not see advertisements when you use any of our online services.

## Linking to Third-Party Websites

APL may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

## Security

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

## Receiving your Information

There are several ways that we could receive your information:

- The customer may provide the information directly via an online application;
- The agent and/or a manager may provide the information directly via our online systems;
- The employees of our clients may provide the information via our online systems as a routine business procedure;
- Imported from other third parties via secured communication channels.

It is also possible that we are asked by our clients to enter your information to the system. Those requests are always made in writing. We will not enter your information without the explicit request from our clients in writing.

## Updating your Information

There are several ways that your information could be updated:

- The customer may update the information directly via one of our applications;
- The agent and/or a manager may provide the information directly via our online systems such as eAgentCenter;

- The employees of our clients may update the information via our online systems as a routine business procedure;
- Imported from other third parties via secured communication channels.

Keeping your account information up-to-date is very important and is not the responsibility of APL. If you cannot change the incorrect information online, or if you prefer to request changes offline, please contact the company you contracted to do business with or the company that provides you with their services.

It is also possible that we are asked by our clients to update your information in the system. Those requests are always made in writing. We will not update your information without the explicit request from our clients in writing.

## **Removing your Information**

To completely remove your personal information, please contact the company you contracted to do business with, or the company that provides you the product or services.

## **Changes to this Online Privacy Policy**

We may change this Online Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new “Last Updated” date. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise.

If you have any questions or complaints about the use of your personal information or about this Online Privacy Policy, contact [info@aplplus.com](mailto:info@aplplus.com).