

Privacy Policy for Tom Gagliano– Dated September 1, 2014

Tom Gagliano (“we”, “us” or “CC”) has created this privacy policy (the "Policy") to explain our privacy practices so You will understand when and how personal information is collected, used, disclosed and protected with respect to our product service ("Product") available through our website ("Site") located at <http://www.TomGagliano.com>. By using the Product, You consent to the privacy practices described in this Policy. We reserve the right to change this Policy at any time. If we make any material changes to our Policy, we will post a new policy on our Site. Your use of the Site following the posting of such changes shall constitute your acceptance of any such changes. Therefore, we encourage you to check our Policy whenever you use the Product to see if it has been updated since your last visit.

Information About You.

We collect two basic types of information with our Site and Product, namely Personal Information and Aggregate Information. Personal information is information that is directly associated with a specific person or entity such as a User's name, address, zip code, birth date, gender, e-mail address, user-chosen ID, password, social security number, payment information or information about activities that is directly linked to that person. Any Personal Information collected from You is securely stored indefinitely in archival backup copies. Personal Information may be shared with certain third parties. As outlined below, to the extent that this information is shared with these third parties, it is strictly limited to the following purposes; transaction processing, business functions, internal analysis and as required by law or permitted to protect our rights, property, or safety. We take commercially reasonable efforts to otherwise protect your Personal Information.

Our definition of Personal Information does not include "Aggregate" Information. Aggregate Information is data we collect about a group or category of services or users from which individual user identities have been removed, which may include demographic information. In other words, information on how You use our Product may be collected and combined with information about how others use the Product, but no personal information will be included in the resulting data. For example, information that forty-seven percent of the Site's registered users identify themselves as male, but without identifying any specific individuals as male, is aggregate information. Aggregate data helps us understand trends in our users' needs so that we can better consider new features or otherwise tailor our Product. We may share aggregate information about our users with third parties to help us better understand and improve our Product and for marketing purposes.

Those are the types of information we collect. You should refer to the rest of this Policy to see how we collect, use, disclose and protect this information.

Collection of Information.

(i) Information You Give Us.

We collect information You give us at various times when you register with us and use our Product. Examples include the following:

Registration and Transaction Information. When You register to use the Product, we may collect various kinds of contact information about You including, for example, Your name, payment information, e-mail address, and other contact information. We may also collect images, pictures, or data files. You may also be asked to create a user-chosen ID and password for your use when accessing the Product.

Submissions and Customer Service. From time-to-time, we may post surveys, contests, or sweepstakes on our Product, which may request demographic information and customer feedback. Participation in these requests is completely voluntary and with each request You will have the choice of whether or not to participate and disclose information. Also, we may collect information that identifies You personally when you send us comments, questions or suggestions, or when you participate in interactive services such as message boards.

(ii) Automatically Collected Information.

We automatically receive certain types of information whenever You interact with us. For example, when You use the Product through the Site, our systems automatically collect your IP address and the type of browser You use.

We may also collect standard access information, such as the time and date of accessing the Product, and usage of the Product. We use such information to gather access information such as counting the users who have visited those pages and compiling aggregated statistics about Product usage.

(iii) This Policy in no way limits or restricts our collection of aggregate information.

Cookies. We may use cookies to collect information so that we can improve our Site by seeing which areas and features are most popular; to personalize the Site and improve the Site experience; to allow You to visit the Site without re-entering your member ID and/or password; and to track and complete transactions you have requested. Most browsers automatically accept cookies as the default setting. You can modify the setting to reject cookies or to prompt You before accepting a cookie from the sites You visit by editing browser options. If You decide not to accept our cookies, You will still be able to access those parts of our Site available to the general public, but You may not be able to use some of the Site's features or services, and You may have a less satisfactory experience.

Our Product is not intended to be used by minors under the age of 18, and we do not knowingly, directly or passively, collect information from anyone under the age of

18. If we create offers and products that make it appropriate to collect information from minors under the age of 18, we will notify you of the change in this Policy.

Internal Use of Personal Information.

In general, we use Personal Information internally to serve our users and enable them to take maximum advantage of our Product. For example, to conduct marketing analysis, to provide personalized services, to provide services or complete transactions You have requested, to anticipate and resolve problems with our Product, to respond to customer support inquiries, and to create and inform You of new products and services from CC, LLC that better meet Your needs. By registering with our Product, You give consent for us to communicate with You at any of the contact points You provide to us for any of the aforementioned purposes.

You should review the following section to understand when CC discloses personal information to non-affiliated third parties.

Disclosure of Personal Information.

We do not rent, sell, or share Personal Information about You with other people or non-affiliated companies except (i) as necessary to perform internal analyses and business functions, (ii) as part of a business transfer, or (iii) when required by law or permitted to protect our rights, property, or safety. The following section describes these disclosure circumstances more fully.

(i) Transaction Processing and Business Functions.

We may share Personal Information with third-party vendors who assist us in performing internal functions necessary to operate our business, or who assist us in processing and completing transactions that You have requested or earned. For example, our e-commerce partner receives and stores your name, address, and financial information. In the event that we use third-party vendors to assist us in performing processing functions, the third parties may not use or disclose your personal information for any other purpose. We will also use the services of third parties to process payments to those of our members who receive commissions, and those parties will receive social security numbers, tax identification numbers, addresses and in some instances bank account numbers. *The use and disclosure of your Personal Information by these third parties is restricted to performance of such tasks.*

(ii) Internal Analysis.

We may use information about You for our own internal purposes, such as to estimate our audience size, measure aggregate traffic patterns as well as to understand demographic, customer interest, and other trends among our users. We may outsource these tasks and disclose Personal Information about You to third parties in aggregate,

provided the use and disclosure of your Personal Information by these third parties is restricted to performance of such tasks.

(iii) Business Transfers.

Information about our Users and the Product is one of our most important business assets. Therefore, information about our Users, including Personal Information, will be disclosed as part of any merger or acquisition, creation of a separate business to provide the Product, sale or pledge of company assets as well as in the event of an insolvency, bankruptcy or receivership in which such information would be transferred as one of the business assets of the company.

(iv) Protection of CC and Others.

We may release Personal Information in the good faith belief that release is appropriate and necessary to comply with legal process or authority (e.g., a lawful subpoena, warrant or court order); to enforce or apply our policies; to initiate, render, bill, and collect for amounts owed to us; to protect our rights, property, or personal safety of CC, our Users, our employees, or the public; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.

Third Party Sites.

Please be aware that CC as well as some Users may provide links to third-party web sites and we are not responsible for the content or information collection practices of those sites. Please also note that these web sites' privacy policies will differ from those of CC. Therefore, we encourage You to review and understand their privacy practices before providing them with information or visiting their sites.

Network and Information Security.

We use commercially reasonable efforts to protect Your Personal Information. This includes the use of a third party security certificate to secure Personal Information such as SSN and payment processing information. While we have taken such efforts to guard Your Personal Information, we cannot guarantee that Your information may be not be disclosed or accessed by accidental circumstances or by the unauthorized acts of others.

Your account information and access to our Product is accessible only through the use of an individual user ID and password. To protect the confidentiality of Personal Information, You must keep Your password confidential and not disclose it to any other person. You are responsible for all uses of our Site and Product by any person using Your account user ID and password. Please advise us immediately if You believe Your account user ID and password have been misused.

Access and Control of Personal Information.

If You are a registered user of our Product, You may view, correct, or delete Your Personal Information by logging into the Site and editing Your profile. Please be aware, however, that any Personal Information You may make publicly accessible on or through the Product may not be altered. Accordingly, please be careful when making any Personal Information available to the public. We reserve the right to send you certain communications relating to our Product and Site, such as customer service responses and other administrative messages.

Updating This Policy.

We may revise and update this Policy if our practices change, as technology changes, or as we add new services or change existing ones. As changes are made, we will post an updated Policy on our site and change the date of the Policy. Users should review this Privacy Policy on a regular basis to keep themselves apprised of any changes. Additionally, following the posting of modifications, all users will receive a newsletter making them aware of such modifications. If You do not agree with the revised Privacy Policy, Your sole recourse is to immediately stop all use of the Products. Your continued use of the Products following the posting of modifications will constitute Your acceptance of the revised Privacy Policy. Following the posting of modifications, such modifications shall become effective immediately upon Your continued use of the Products. Additionally, if we are going to use any Personal Information in a manner that is materially different from that stated in our Policy at the time we collected such information, we will give You a reasonable opportunity to consent to the change. We will use information in accordance with the most current privacy policy. Should You have any questions regarding the use of our Site, please contact us at: tom@tomgagliano.com.

California Privacy Rights

(This Provision Applies to California Residents Only)

California Civil Code Section 1798.83 permits customers who are California residents to request certain information regarding disclosure of personal information to third parties for their direct marketing purposes. We do not provide your Personal Information to any third party for their direct marketing purposes without your consent. If you would like more information with respect to your privacy rights under California law, you may contact us at the contact point below. Please reference your request as "California Disclosure Information."

Contacting Us.

If you have any questions or comments about this Policy, the privacy practices of the Product, or your dealings with CC, please contact us at: tom@tomgagliano.com