



## GCG PRIVACY POLICY

(Last Modified July 17, 2008)

### I. PROTECTION OF SOCIAL SECURITY NUMBERS AND OTHER PERSONAL INFORMATION

The Garden City Group, Inc. ("GCG ") Privacy Program is designed to prevent the unauthorized disclosure of non-public personally-identifiable ("Private") information in our possession, including Social Security numbers and other non-public information that either identifies an individual or can be used in conjunction with other information to do so. Our personnel are required to follow specific security procedures for storing, using, and disposing of Private information provided to us. We may grant access to such information only to individuals who reasonably need it to accomplish the purposes for which the information was collected. GCG policy prohibits the unlawful disclosure of Social Security numbers or other Private information.

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### II. POLICIES CONCERNING INFORMATION COLLECTED THROUGH THIS WEBSITE

GCG maintains and operates this website (the "Site") located at <http://www.internationalauctionsettlement.com/>. The following statements of GCG policy apply specifically to information that comes to us through this Site. They are intended to identify what information GCG may collect from you through this Site and inform you of how we may use that information.

**Please take a moment to review the terms of this Privacy Policy. Your continued use of this Site indicates your acceptance of these terms. If you do not agree to the terms of this Privacy Policy, please discontinue use of the Site immediately.**

#### A. Collection, Use and Disclosure of Private Information

- **What Private Information We May Collect**

You may be required to provide Private information in order to access the Site and the information available through it. To take advantage of some of the features offered on the Site you may need to tell us your name, e-mail address, mailing address, phone number and other personal information. You may be asked for additional information in areas of the Site that relate to particular cases in which a court has authorized us to provide services. Depending on the circumstances of the case, you may be asked to provide financial or other Private information that we need in order to evaluate and process your claim.

- **Children's Privacy**

GCG does not knowingly collect information from children under the age of 13 through this Site. **If you are under the age of 13, please do not use this Site or provide information to us.** If we become aware that we have received Private information from a child under the age of 13, we will make commercially reasonable efforts to delete that information from our database.

- **How We May Use Private Information**

GCG will retain and use your Private information to accomplish the purposes for which you provided it to us, such as communicating with you or processing your claim. We may also use it to customize the services we provide to you and to comply with applicable laws, regulations and GCG policies.

- **When We May Disclose Private Information**

- Except for the limited situations discussed in this Privacy Policy, GCG will not share your Private information with any third parties. We may share it as needed to fulfill your request, process your claim or otherwise provide our noticing and/or administration services. For example, we may be called upon to provide information to the court in which a case is pending, the litigants in the case and their counsel.
- GCG also reserves the right to disclose Private information acquired online if we believe, in good faith, that the law requires it or that such disclosure may be necessary to prevent misuse of the Site. For example, we may use the information to identify, contact and/or bring legal action against someone whose activities may threaten (either intentionally or unintentionally) to infringe upon the rights or property of GCG, other visitors to the Site, or anyone else.
- GCG does not rent, sell or otherwise disclose anyone's Private information for any other purpose.

## **B. Compiled Information**

- **Statistical Information**

From time to time, we may gather general, non-personal, statistical information about the use of the Site, such as how many visitors visit a specific page, how long they remain on that page, and the hyperlinks, if any, on which they "click." Through the use of technological features such as "IP addresses" and "cookies" (both of which are discussed in greater detail below) GCG may collect that kind of information to determine which areas of the Site are visited most frequently and to enhance the Site for visitors. We may also compile that data in order to describe the use of the Site to our clients or other third parties, or to respond to a government and/or legal request. Please be assured, however, that this compiled data will not personally identify you or any other visitors to the Site.

- **IP Addresses**

An "IP address" is a number that is automatically assigned to your computer whenever you surf the web. Web servers, computers that "serve up" web pages, automatically identify your computer by its IP address. GCG records IP addresses for purposes of system administration, to report statistical information to third parties and to track the use of the Site. When a visitor requests pages from the Site, our servers log the visitor's IP address. It is not our usual practice to link IP addresses to any personally identifiable information. Although a visitor's session is logged, the visitor typically remains anonymous to us. GCG reserves the right to identify a visitor through an IP address, however, if we believe it necessary to enforce compliance with the Site's policies or to protect GCG, visitors to the Site or others.

### C. Links to Other Sites

- Please be aware that, when you are on the Site, you could be directed to other sites that are beyond our control. Links may take you from the pages of this Site to unaffiliated sites. These other sites may transmit their own “cookies” (pieces of information that a website transfers to an individual’s hard drive for record-keeping purposes) to visitors, collect data or solicit personal information. The privacy policies of these other sites may differ significantly from this Privacy Policy. We are not responsible for the privacy practices of these other sites and cannot guarantee the security of any information that may be collected there.

### D. Security

- Protecting the security of your Private information is very important to us. When you transmit Private information from your computer to our servers, your information is protected by a “firewall” (a combination of hardware and software that helps keep unauthorized visitors from accessing information within our computer network), as well as industry standard SSL (Secure Sockets Layer) encryption. Once GCG receives your transmission, we will take reasonable precautions to keep your information secure on our systems. While we strive to protect your privacy, however, no data transmission over the Internet can be guaranteed to be 100% secure. GCG, therefore, cannot warrant or guarantee the security of any Private information you transmit to us online or be responsible for the theft, destruction, or inadvertent disclosure of that information.

### E. Changes to This Policy

- The terms of this Privacy Policy may change from time to time. If a change is made, the “Last Modified” date located at the top of this Policy will be updated to reflect the amendment. You are advised to check periodically for any changes. **Your continued use of the Site after GCG posts changes to this Privacy Policy will indicate your acceptance of those changes.**

### F. To Unsubscribe

- If you do not wish to receive further e-mail from us, you may unsubscribe by contacting us at [unsubscribe@gardencitygroup.com](mailto:unsubscribe@gardencitygroup.com).

## III. QUESTIONS?

Any questions that you may have regarding this Privacy Policy may be directed to [William.Brandt@gardencitygroup.com](mailto:William.Brandt@gardencitygroup.com).