

Privacy Policy

The Financial Services Modernization Act of 1999 Updated May 31st, 2018

What personal information do we collect from the people that visit our blog, website or app?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, social security number or other details to help you with your experience.

When do we collect information?

We collect information from you when you place an order, subscribe to a newsletter, respond to a survey, fill out a form at application or enter information on our site.

How do we use your information?

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To personalize user's experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To allow us to better service you in responding to your customer service requests.
- To quickly process your transactions.
- To send periodic emails regarding your order or other products and services.

How do we protect visitor information?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your

visit to our site as safe as possible. Your personal information is contained behind secured networks and is

only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally identifiable information' (PII) is being used online. PII, as used in US privacy law and information security,

is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information, in accordance with our website. Our Privacy Officer is Medardo F. Cevallos.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Do we use 'cookies'? We do not use cookies for tracking purposes

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to

turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies. If you disable cookies off, some features will be disabled that make your site experience more efficient and some of our services will not function properly. However, you can still place orders.

Third Party Disclosure

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Google Advertising Requirements

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our site but we may do so in the future.

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13.

European Union Requirements

We do not intend to share your personal data outside the European Economic Area (EEA). We may be subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such, we may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or if we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe. If none of the above safeguards are available, we will request your explicit consent to the specific transfer via email. You will have the right to withdraw this consent at any time.

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify the users via email as soon as reasonable after discovery of the data breach.

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.
- Process orders and to send information and updates pertaining to orders
- Market to our mailing list or continue to send emails to our clients after the original transaction has Occurred

To be accordance with CANSPAM we agree to the following:

- NOT use false, or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

If at any time you would like to unsubscribe from receiving future emails, you can

- Email us and we will promptly remove you from ALL correspondence.

If there are any questions regarding this privacy policy you may contact us using the information below.

CUSTOMER COMPLAINT POLICY

It is the policy of our company to respond to customer complaints, disputes and issues immediately, to take each complaint seriously, to investigate each complaint however small it is – immediately and to take remedial actions swiftly.

As soon as a complaint is received, it is documented and is logged into a special log. The complaint is sent directly to the Customer Complaint Officer or designate, in order to take action. Our Customer Complaint Officer is Medardo F. Cevallos.

All complaints and records of complaints are kept in a special complaints binder along with all the Customer Complaint Officer's Quality Control Files and other written policies so employees can easily

access them and use them to provide better customer service. Reports on complaints are reviewed during the Customer Complaint Officer's meetings with our Board. We are focused on providing financial products and services to all customers in compliance with all Federal and State regulatory policies including but not limited to consumer protection, fair lending and civil rights laws. In the event a complaint needs to be filed with us the complaining entity or person may:

- Contact our Customer Complaint Officer at the number above.
- Notify our Customer Complaint Officer in writing via email.
- Write a traditional letter to us at the address below.

The complaint should be encouraged to be submitted in writing, and should include the following information:

- The name, address, and telephone number of the complainant.
- A description of the act or practice that is thought to be unfair or deceptive, or in violating of existing law or regulation, including all relevant facts.

Response to a complaint sent directly to us will typically be provided before the end of thirty (30) day period from the date that we received the complaint.

In the event a complaint is not resolved to your satisfaction you may contact the **Consumer Financial Protection Bureau** at <http://www.consumerfinance.gov/complaint/>

Address for traditional letters:
Home Financial Group, LLC
13790 NW 4th Street, Suite 110
Sunrise, Florida 33325

FOR WEB SITE

It is the policy of our company to respond to customer complaints, disputes and issues immediately, to take each complaint seriously, to investigate each complaint however small it is – immediately and to take remedial actions swiftly.

As soon as a complaint is received, it is documented and is logged into a special log. The complaint is sent directly to the Customer Complaint Officer or his designate, in order to take action.

All complaints and records of complaints are kept in a special complaints binder along with all the Customer Complaint Officer's Quality Control Files and other written policies so employees can easily access them and use them to provide better customer service. Reports on complaints are reviewed during the Customer Complaint Officer's meetings with our Board. We are focused on providing financial products and services to all customers in compliance with all Federal and State regulatory policies including but not limited to consumer protection, fair lending and civil rights laws. **For more information, contact us at the number on the Home Page.**