

YOUR PRIVACY IS IMPORTANT

The Client First Settlement Funding, LLC family of companies, including Client First Lotteries, (“CLIENT FIRST,” “us,” “our,” or “we”) recognizes the importance of protecting your nonpublic personal information. Because your privacy is our concern, we have developed this Privacy Policy to inform you about our privacy practices. The examples in this Privacy Policy are illustrative only and are not intended to be exclusive.

CLIENT FIRST strives to offer our clients and visitors of our web sites, including clientfirstfunding.com and clientfirstlotteries.com (the "Site"), the many advantages for a personalized experience. In order to do this, we may, at times, use "Personally Identifiable Information" (any information that can be used to identify a specific individual, such as a name, postal address, telephone number or e-mail address) subject to the terms of this privacy policy statement ("Policy"). Please note that this Policy applies only to information collected by CLIENT FIRST mailers, online forms, and any other promotional offer, and does not impact information collected or used by CLIENT FIRST, its subsidiaries, or its affiliates through other means. By giving your information to CLIENT FIRST, you signify your acceptance of this Policy.

What types of information does CLIENT FIRST collect about you and from whom?

We obtain information about you directly from you, from applications, contracts, documents and forms you complete or sign, or in telephone conversations with you. We may obtain additional information about you or, with your authorization, others who may have an interest in your insurance policy, annuity contract or primary residence, from additional sources, including your insurance company, insurance producer, health care providers, creditors, credit reporting agencies, and your representatives or advisors. We may also obtain information about you from public records and, with your authorization, other persons.

We may obtain the following types of nonpublic personal information about you:

- Personal information, such as your name, address, social security number, driver’s license number, occupation and employer;
- Financial information, such as assets, income, credit history, banking information and account numbers;
- Legal information, such as judgments, liens, bankruptcies, divorces, probate, and other civil and criminal court proceedings;
- Other identifying information, such as birth date, telephone and fax numbers, and email, street, and mailing addresses;
- Insurance or annuity policy information, including the policy terms, conditions and limits, the named beneficiaries, and your premiums and payment history; and
- Medical information, such as your current health status and prior health care treatments.

To whom does CLIENT FIRST disclose the information collected about you?

Information Sharing and Disclosure

CLIENT FIRST will not rent or sell your nonpublic personal information to anyone without first obtaining your consent. However, we will disclose your information if we are required or permitted by law to do so. Additionally, with your authorization, we will disclose your nonpublic personal health information to our affiliates and non-affiliated companies that provide services for us related to a transaction you request. With your authorization, we will disclose your nonpublic personal health information to entities that provide us with financing or financial support for a transaction that you request. Additionally, as permitted by law and with your authorization, we may disclose your health information to allow our authorized representative to contact you for purposes of determining your current health status.

As permitted by law or with your authorization, we will share your nonpublic personal financial information (1) with our affiliates and non-affiliated companies that provide services for us related to a transaction you request and (2) under the following additional circumstances:

- To establish or exercise our legal rights or defend against legal claims;
- In connection with a proposed or actual sale, merger, transfer, exchange or consolidation of CLIENT FIRST or any portion of our business;
- To secure services and advice from our attorneys, accountants and auditors; and
- To permit our affiliates to contact you about other products and services offered by the CLIENT FIRST companies.

We may also disclose your nonpublic personal financial information for other purposes or to other persons with your authorization or otherwise as required or permitted by law.

Our Former Customers

We treat information about our former customers in the same manner as we treat information about our current customers.

Confidentiality and Security

We restrict access to the nonpublic personal information we receive about you. Only employees of the CLIENT FIRST companies who need to know that information to provide products or services to you have access to your information. We also maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information against unauthorized access or use. Non-affiliated companies to whom we disclose your nonpublic personal information are obligated to maintain your privacy under confidentiality agreements and do not have any independent right to use your information.

Maintaining the accuracy of your information is a shared responsibility. We maintain the integrity of the information you provide us and will update your records when you notify us of a change. Please contact us at the address or phone number listed below when information concerning you changes.

Updates to our Privacy Policy

From time to time we may change our Privacy Policy. If our information practices change, we will post the changed policy to our website. We reserve the right to change this policy at any time.

Linked Web sites

Because CLIENT FIRST cannot control the content of sites linking to or from our Web site, we are not responsible, nor can we make representations to the content of those Web sites or their individual privacy policies.

“Cookies”

Cookies may be sent to your browser from our Web site in order to provide you with better service when you return to our website. A cookie is a string of data that is stored on your hard drive, which enables us to track your use of our website. With them we can determine the number of unique users accessing the various pages on the site and improve flow and content.

Special Offers, Newsletters and Updates:

Out of respect for the privacy of our users we present the option to not receive these types of communications, as explained in the Choice and opt-out section below.

Customer Service:

We communicate with users on a regular basis to provide requested services. We respond to issues relating to a user's account via e-mail or phone, in accordance with the user's wishes.

Choice and opt-out:

A user can change their opt-in or opt-out status in several ways:

- From a Newsletter: Click on the "Unsubscribe" link within the e-mail.
- You may additionally unsubscribe by sending your request to privacy@clientfirstfunding.com

Within Our Corporate Family:

We may share information with our parent company, subsidiaries, joint ventures or other companies under common control, where it may be used to provide joint services or for purposes such as internal statistics, strategic decision-making, customer verification, fraud prevention and security.

Legal Disclaimer:

Though we make every effort to preserve user privacy, we may disclose personal information when required by law or under the good-faith belief that such action is necessary under applicable law. We may disclose personal information in order to establish or exercise our legal rights or defend against legal claims. We also share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, to protect our property or interests or that of our agents and employees, and to protect personal safety or the public.

Aggregate Information (non-personally identifiable):

We share some aggregated demographic information (age, zip codes) with some of our partners. This is not linked to any personally identifiable information. We may use third-party advertising companies to serve ads on our behalf. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous.

Third Party Service Providers:

We may disclose information about individual users to third parties who provide services to CLIENT FIRST. These third parties provide a variety of services to CLIENT FIRST, including, without limitation, verifying credit card information, tracking Internet marketing campaigns, and processing credit card transactions. In addition, these services may include enhancing the information CLIENT FIRST collects about its customers. We may also use third-party e-mail providers to assist with sending our marketing e-mails. These companies do not retain, share, store or use personally identifiable information for any secondary purposes. Any personally identifiable information that CLIENT FIRST shares with its service providers may only be used to provide services to CLIENT FIRST and the service providers will not be given permission to use such information for other purposes.

Business Transitions:

In the event CLIENT FIRST goes through a business transition, such as a merger, an acquisition by another company, or a sale of all or a portion of its assets, users' personal information will, in most instances, be part of the assets transferred. Users will be notified via prominent notice on our website for 30 days after a change of ownership or control of their personal information, if personal information will be used contrary to this policy. If as a result of the business transition, the users' personally identifiable information will be used in a manner different from that stated at the time of collection, users will be given the option to continue sharing their information consistent with our notification of changes section. However, nothing in this Privacy Policy is intended to interfere with the ability of CLIENT FIRST to transfer all or part of its business and/or assets (including the Site), for any purposes, without any limitation whatsoever. CLIENT FIRST specifically reserves the right to transfer or share a copy of personally identifiable information collected from its Site to the buyer of that portion of its business relating to that information.

Security

This website takes every reasonable precaution to protect our users' information. When users submit sensitive information via the website, their information is protected both online and off-line.

When our registration/order form asks users to enter sensitive information (such as credit card number), that information is encrypted and is protected with encryption software, currently SSL encryption. While on a secure page, such as our order form, the lock icon on the bottom of web browsers such as Netscape Navigator and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when users are just 'surfing'. While we use SSL encryption to protect sensitive information online, we also protect user-information off-line. Access to all users' information, not just the sensitive information mentioned above, is restricted to our offices. Only

employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Employees are kept up-to-date on our security and privacy practices. The servers that store personally identifiable information are in a secure environment, behind a locked cage at a professional hosting company. Although we endeavor to create secure and reliable Sites and to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed in a manner that is inconsistent with this Privacy Policy. You hereby acknowledge that CLIENT FIRST is not responsible for any intercepted information sent via the Internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

External Links

The Site contains links to other websites maintained by third parties. Please be aware that CLIENT FIRST exercises no control over linked sites and is not responsible for the privacy practices or the content of such sites. Each linked site maintains its own independent privacy and data collection policies and procedures, and you are encouraged to view the privacy policies of these other sites before providing any personal information.

Changes in this Privacy Statement

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently.

Contact Information

If you have questions about the information in this notice, please write us at:
CLIENT FIRST Settlement Funding
301 Yamato Road, Suite 3200
Boca Raton, FL 33131

www.clientfirstfunding.com

This policy is effective June 2011