

PRIVACY POLICY & CALIFORNIA CONSUMER PROTECTION ACT | FRANKLIN GOLD

Thank you for accessing the Franklin Gold website operated by Franklin Gold, We respect your privacy and want to protect your personal information. The Privacy Act of 1974, 5 U.S.C. § 552a, establishes a code of fair information practices that governs the collection, maintenance, use, and dissemination of information about individuals that is maintained in systems of records by federal agencies. A system of records is a group of records under the control of an agency from which information is retrieved by the name of the individual or by some identifier assigned to the individual.

The Privacy Act requires that agencies give the public notice of their systems of records by publication in the Federal Register. The Privacy Act prohibits the disclosure of a record about an individual from a system of records absent the written consent of the individual, unless the disclosure is pursuant to one of twelve statutory exceptions. The Act also provides individuals with a means by which to seek access to and amendment of their records, and sets forth various agency record-keeping requirements. To learn more, please read this Privacy Policy. This Privacy Policy applies to this website. This website contains links to other websites. We are not responsible for the content or privacy practices on any website not operated by Franklin Gold. We encourage users to be aware when they leave our website and to read privacy statements of any other site that collects personally identifiable information. This policy explains how we collect, use and (under certain conditions) disclose your personal information. It does not necessarily apply to any offline collection of your personal information. It also explains the steps we have taken to secure your personal information. Finally, this policy explains your options regarding the collection, use and disclosure of your personal information. By visiting the website directly or through another site, you accept the practices described in this policy.

Table of Contents

- 1. Information Collection and Use**
- 2. Data Security**
- 3. Google Analytics Privacy Policy**
- 4. Opt-Out/Corrections**
- 5. Monitoring/Recording of Telephone Calls**
- 6. Offline Collection, Use & Disclosure of Information**
- 7. Privacy Complaints**
- 8. Your California Privacy Rights**
- 9. Updates to this Policy**

INFORMATION COLLECTION AND USE

1: We collect information from you several different ways on this website. One goal in collecting personal information from you is to provide an efficient, meaningful, and customized experience. For example, we can use your personal information

To:

A. Help us create content that is most relevant to you; and

B. Alert you to new information, products, and services that we offer.

C. Registration and Ordering. Before subscribing to certain features, you must complete an online registration form. During registration, you will be prompted to provide to us certain personal information including, but not limited to, your name, address, telephone number, and email address. If you choose to purchase a product online, we will ask for your name, telephone number, billing address and credit card number and related information. These kinds of personal information are used for billing purposes, to fulfill your orders, to communicate with you about your order and the Sites, and for internal marketing purposes. If we encounter a problem when processing your order, your personal information may be used to contact you. We may also use your personal information to verify the delivery or credit card information or otherwise conduct due diligence to ensure proper processing of your order and to minimize the risk of fraudulent transactions. In conducting due diligence, we may acquire additional personal information from third-parties such as Accurant. We also may verify your personal information including addresses and telephone numbers using third-party providers.

D. Forms and Applications. Several forms such as our Account Agreement may be completed and submitted online. These forms generally ask for personal information such as your name, address, telephone number, and email address. Depending on the form or application, this information is used to set up an account, complete an order, contact you about your order, and provide email news alerts and other email marketing and for internal marketing purposes. You may also download forms from the website, which are then transmitted to Franklin Gold. These forms ask for personal information, which may include your name, address, telephone number, driver's license number, email address, Social Security Number, and date of birth.

E. Email Addresses. Several locations of the website permit you to enter your email address for purposes including but not limited to: registering for information or to access certain information, sign up for email news alerts and special offers, or to order a product online.

F. Log Files. As is true of most websites, this website server automatically recognizes the Internet URL from which you access the website. We may also log your Internet protocol ("IP") address, Internet service provider, and date/time stamp for system administration, order verification, internal marketing, and system troubleshooting purposes. An IP address may indicate the location of your computer on the Internet.

G. Franklin Gold, does not respond to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party websites or online service collection.

H. Our Company Commitment to Children's Privacy. Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws. We therefore do not knowingly or intentionally collect personal information

from persons who are under eighteen years of age. If you are under the age of eighteen, you are not permitted to access this website and/or to submit any personal information via this website. Due to the age restrictions for use of this website as stated herein, no information obtained by this website falls within the purview of the Children's Online Privacy Protection Act, and information submitted to this site is not monitored for such purposes.

I. Social Security Numbers. We collect Social Security numbers when it is required to perform a service such as purchasing certain precious metals from a customer, providing goods related to a self-directed IRA, or as required by applicable law.

2: Cookies and Other Technology. Like many sites, this website employs cookies and web beacons (also known as clear GIF technology or "action tags") to speed your navigation of the website, recognize you and your access privileges, and track your website usage.

A. Cookies are small pieces of information that are stored as text files by your Internet browser on your computer's hard drive. Most Internet browsers are initially set to accept cookies. You can set your browser to refuse cookies from web sites or to remove cookies from your hard drive, but if you do, you will not be able to access or use portions of this website.

We have to use cookies to enable you to select products, place them in an online shopping cart, and to purchase those products. If you do this, we keep a record of your browsing activity and purchase. THE SITE'S COOKIES DO NOT AND CANNOT INFILTRATE A USER'S HARD DRIVE TO GATHER A USER'S CONFIDENTIAL INFORMATION. Our cookies are not "spyware."

B. Web beacons assist in delivering cookies and help us determine whether a web page on this website has been viewed and, if so, how many times. For example, any electronic image on this website, such as an ad banner, can function as a web beacon.

C. Where cookie technology is unavailable we may use an anonymous identifier to speed your navigation of the website, recognize you and your access privileges, and track your website usage. An anonymous identifier is a random string of characters that is used for the same purposes as a cookie on platforms, including certain mobile devices where cookie technology is not available.

D. We may use third-party advertising companies to help tailor our website content to users or to serve ads on our behalf. These companies may employ cookies and web beacons to measure advertising effectiveness (such as which web pages are visited or what products are purchased and in what amount). Any information that these third-parties collect via cookies and web beacons is not linked to any personal information collected by us. As an example, Facebook collects certain information via cookies and web beacons to determine which web pages are visited or what products are purchased. Please note that any information collected by Facebook via cookies and web beacons is not linked to any customer's personal information collected by us.

3: Information Use and Disclosure.

A. Internal Use. We use your personal information to process your order, provide requested information, and provide you with customer service. We may internally use your personal information to improve this website's content and layout, to improve outreach and for our own marketing efforts

(including marketing our services and products to you), and to determine general marketplace information about visitors to the website.

B. Communications. We will use your personal information to communicate with you about this website and your orders as well as requests for information and deliveries. Also, we may send you a confirmation email when you register or order with us. We may send you a service-related announcement on the rare occasions when it is necessary (for example, if we must temporarily suspend our service for maintenance). You may submit your email address for reasons such as to sign up for email news alerts and special offers, or to request free information about acquiring precious metals. If you submit your email address, we use it to deliver the information to you. We always permit you to unsubscribe or opt out of future emails (see the opt out section below for more details). Because we have to communicate with you about orders that you choose to place, you cannot opt out of receiving emails related to your orders.

C. External Use. We want to provide you with excellent service. We do not sell, rent, trade, license or otherwise disclose your specific personal information or financial information to anyone other than to affiliates under our control. However, the following exceptions may apply:

i.) As do many retailers, we sometimes use third parties to perform specific functions on our behalf. When we disclose information to these service providers, we disclose information to help them to perform their service. For example, in order to deliver products to you, we must share some information. We work with third-parties (such as the U.S. Postal Service, UPS®, and FedEx®) to ship products, ensure delivery, obtain feedback, improve the quality of our service, and measure and improve the quality of the third-party's service. In the example of shippers, we provide them with some personally identifiable information such as your name, shipping address, email, and phone number. We also disclose personally identifiable information to third-parties who perform marketing or marketing research on our behalf. We generally require entities with which we share your nonpublic personal information, including companies that process or service transactions for us, to agree to keep your information confidential. We also prohibit them from using or disclosing your information except for the limited purpose and to the persons for whom disclosure was intended, or as otherwise permitted by law.

ii.) Similarly, to help you buy products and provide customer service to you, we must provide your credit card number to financial services corporations such as credit card processors.

iii.) We may disclose personal information in response to requests from law enforcement officials conducting investigations, subpoenas, a court order, or if we are otherwise required to disclose such information by law. We also will release personal information where disclosure is necessary to protect our legal rights, enforce our Terms of Use or other agreements, or to protect others or ourselves. For example, we may share information to reduce the risk of fraud or if someone uses or attempts to use this website for illegal reasons or to commit fraud.

iv.) We will not sell, trade, or rent personally identifiable information to other companies as part of our regular course of business. However, it's possible that we might acquire, merge with, be acquired by another company, or that we might dispose of some or all of our assets. If that happens, your personal information may be disclosed to another company, but that disclosure will be subject to the Privacy Policy in effect.

v.) We may share non-personal information (such as the number of daily visitors to a particular web page, or the size of an order placed on a certain date) with third-parties such as advertising partners.

This information does not directly personally identify you or any user.

vi.) We may update and supplement personally identifiable information that we have collected directly from our customers with other information that we obtain from third-parties. This may include information regarding demographics, income estimations, households and marital status. In addition, we may obtain personally identifiable information about individuals who are not yet users of our website or customers of Franklin Gold, When we associate information that we obtain from third-parties with personally identifiable information that we have collected under this Privacy Policy, we will treat the acquired information like information that we collected ourselves. Except as permitted by this Privacy Policy, the information will not be shared with third-parties. We purchase marketing data from third-parties and add it to our existing user database to better target our advertising and to provide pertinent offers in which we think you would be interested.

To enrich our profiles of individual customers, we tie this information to the personally identifiable information they have provided to us.

vii.) Finally, we may take your personally identifiable information and make it non-personally identifiable, either by combining it with information about other individuals (aggregating your information with information about other individuals), or by removing characteristics (such as your name) that make the information personally identifiable to you (de-personalizing your information).

Given the nature of this information, there are no restrictions under this Privacy Policy upon the right of Franklin Gold, to aggregate or de-personalize your personal information, and Franklin Gold, may use and/or share with third-parties the resulting non-personally identifiable information in any way.

DATA SECURITY

The security and confidentiality of your information is important to us. We have implemented certain technical, administrative, and physical security measures designed to help protect customer information from unauthorized access and improper use. This is an ongoing process and, from time to time, we review our security procedures in order to consider appropriate new technology and methods. Please be aware that despite a company's best efforts, no security measures are perfect or impenetrable.

This website incorporates physical, electronic, and administrative procedures to safeguard the confidentiality of your personal information, including Secure Sockets Layer (SSL) for all financial transactions through the website. We use SSL encryption to protect your personal information online. We also take several steps to protect your personal information in our facilities. Personal information may be printed or otherwise stored in a non-electronic form. Employees who need access to your personal information to perform a specific job are permitted access to your personal information. Finally, we may rely on third-party service providers for the physical security of some of our computer hardware. We believe their security procedures are satisfactory. For example, when you visit this website, you access servers that are kept in a secure physical environment as well as behind a locked cage and an electronic firewall. Franklin Gold does not guarantee complete security either online or offline.

GOOGLE ANALYTICS PRIVACY POLICY

This website uses Google Analytics, a web analytics service provided by Google, LLC (Google®). Google Analytics uses cookies to help websites analyze user activity. The information generated by cookies about your use of this website (including your IP address) will be transmitted to and stored by Google on

servers in the United States. Where cookie technology is not available, we may use anonymous identifiers. Google will use this information for the purpose of evaluating your use of this website, compiling reports on website activity for website operators, and providing other services relating to website activity and Internet usage. Google may also transfer this information to third-parties where required to do so by law, or where such third-parties process the information on Google's behalf. Google will not associate your IP address with any other data.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

1. Visitors to this website who have JavaScript enabled are tracked using Google Analytics. Google Analytics collects the following types of information from users:

- A. Type of user agent (web browser) used, software manufacture and version number;
- B. Type of operating system;
- C. Screen colors (color processing ability of the users screen);
- D. JavaScript support;
- E. Flash version;
- F. Screen resolution;
- G. Network location and IP address;
 - i. Can include country, city, state, region, county, or any other geographic data
 - ii. Hostname
 - iii. Bandwidth (internet connection speed)
- H. Time of visit;
- I. Pages visited;
- J. Time spent on each page of the website; and
- K. Referring site statistics

1. The uniform resource identifier (URI) the user came through in order to arrive at this website (e.g., clicking on a hyperlink from Yahoo.com that took the user to this website)

2. Search engine query used (e.g., typing in a phrase into a search engine like Google, and clicking on a link from that search engine)

3. This data is primarily used to optimize our website for our visitors, but we may also use this data for marketing purposes. An example of how this data could be used for marketing purposes would be to tell potential advertisers how many visitors we get to the website, where our visitors come from, and how they arrive at our website.

3. This data DOES NOT include any personalized identification information

such as:

- A.) Names
- B.) Phone numbers
- C.) Email addresses
- D.) Mailing addresses
- E.) Social Security numbers
- F.) Bank account numbers
- G.) Credit card information

Visitors who want the ability to prevent their data from being used by Google Analytics may use the Google Analytics opt-out browser add-on for the Google Analytics JavaScript, which may be found here. <https://tools.google.com/dlpage/gaoptout/>. Visitors can also opt out of interest-based ads by Google through Ads Settings. When you opt out, you'll still see ads but they may not be related to factors such as your interests, previous visits to other website, or demographic details. Your opt-outs will apply to interest-based ads in the following places:

4. Google Search and other Google products like Google Maps and Gmail; and

5. Sites across the web that are part of the Google Display Network. Ads Setting lets you opt out of ads shown to you based on factors such as your interests, previous visits to other websites, and demographic details on your computer's browser.

Ads on Google

- 6. Go to Ads Settings at <https://adsettings.google.com/authenticated>
- 7. Under "Ads on Google" click the "Opt-Out" link
- 8. In the dialog that opens, click the Opt-Out button Google Ads Across the Web
- 9. Go to Ads Settings at <https://adsettings.google.com/authenticated>
- 10. Under "Google Ads Across the Web" click the "Opt-Out" link
- 11. In the dialog that opens, click the Opt-Out button

To opt out of all of Google's interest-based ads on your browser, you'll need to opt out twice: once for Google products (Ads on Google) and once for ads on the Display Network (Google ads across the web).

OPT OUT/CORRECTIONS

Upon your request, we will correct/update your personal contact information; however, certain contact information such as names and addresses cannot be deleted. Additionally, you can request to unsubscribe to emails by telephoning Franklin Gold, at 1-800-495-1979, by emailing us at:

corporate@franklin.gold , or by using the “unsubscribe” link found within our marketing emails. Please do not email your credit card information or any other sensitive information. To stop receiving communication from Franklin Gold, and to remove you from all of our offline and online tracking methods, please complete the form below. Please note it may take up to fourteen days for all communication to stop, though we implement your request within 24 hours. You can also request to see what information, if any, we have on you. Remove me from all communication, marketing and tracking.

Email * Name * (First Last)

Collected Data

☐ Yes send me the data you have on me ☐ Opt Out of All Communication

MONITORING/RECORDING OF TELEPHONE CALLS

By visiting the website directly or through another site, you understand and agree that each and every telephone conversation between you and Franklin Gold, – whether you place a call to Franklin Gold, or whether any Franklin Gold, representative calls you – is subject to monitoring and/or recording. You hereby agree and consent to have your calls with any Franklin Gold, representative monitored and/or recorded without further notice or the requirement of additional consent or agreement from you. You also consent to monitoring and/or recording of your telephone conversations with any Franklin Gold, representative by appropriate Franklin Gold, personnel and authorized outside third-party monitors. You acknowledge that you do not have a reasonable expectation of privacy during any of your telephone conversations with any Franklin Gold, representative. You further understand and agree, with respect to the potential monitoring and/or recording of all of your telephone calls, that you expressly waive the right to assert at any time that any conversations between you and any Franklin Gold, representative are or were confidential or private. Franklin Gold, does not guarantee that any recordings of any particular telephone calls will be retained or be capable of being retrieved. Franklin Gold, is not obligated to record or monitor telephone conversations with you but can, in its sole discretion, choose to do so and permit appropriate third-party monitors to do so on Franklin Gold, 's behalf. Franklin Gold monitors and records telephone conversations with its customers for quality control and for Franklin Gold, 's protection. At the same time, unless otherwise agreed by Franklin Gold, 's management in writing, Franklin Gold, does not consent to the recording of telephone conversations by you or by any other party on your behalf. This website is intended for individuals eighteen years of age and older.

OFFLINE COLLECTION, USE, &

DISCLOSURE OF INFORMATION

This Privacy Policy applies only to the online collection of personal information. We also collect information offline where we also try to protect the privacy of your personal information. When someone communicates with Franklin Gold, offline, we will ask for the personal information we need in order to place the order, answer a question, and create a Franklin Gold, client account or otherwise respond to an inquiry. When we need to store information (such as order information), we will enter it into our customer database(s). There are other ways we could learn of personal information offline (for example, when we receive wire instructions, checks or correspondence), however, this policy does not discuss or try to predict all of those methods or the use that will be made of such information. Franklin Gold, will, as appropriate and practicable, treat offline collection, uses, and disclosures of customer personal information consistently with our relevant online practices. You should know that we use

personal information collected offline in a similar manner to how we use personal information, which is collected online, as outlined above.

PRIVACY COMPLAINTS

We take your privacy seriously and have created a process by which you can formally file a complaint. To submit a complaint, you can write a letter that includes:

- 1.) Your name;
- 2.) A summary of your complaint or a written description of the specific circumstances;
- 3.) A summary of other steps taken, if any to resolve this complaint; and
- 4.) A preferred method of contact about your complaint- a mailing address, telephone number, email address, or fax number/ Send us the letter by email to corporate@franklin.gold or by regular mail to:

Franklin Gold, 12121 Wilshire Blvd, Suite 810, Los Angeles, CA 90025

YOUR CALIFORNIA PRIVACY RIGHTS

The California Consumer Privacy Act (CCPA), enacted in 2018, creates new consumer rights relating to the access to, deletion of, and sharing of personal information that is collected by businesses. CCPA provides the right to request the following information from a business:

- 5.) Categories and specific pieces of personal information collected in the preceding twelve months;
- 6.) Categories of sources from which the personal information was collected in the preceding twelve months;
- 7.) The business purpose for collecting or selling such information;
- 8.) Categories of third parties with whom the business shares personal information; and
- 9.) Deletion of personal information about a consumer that the business has collected

You may obtain personal information any time, but Franklin Gold, is not required to provide such information to a customer more than twice in a twelve-month period. Upon a verifiable request, Franklin Gold, will provide the customer with their personal information within 45 days at no cost. This information will be provided electronically or by mail. Note that Franklin Gold, is prohibited from discriminating against any customer for exercising their consumer's rights.

You can exercise your rights as a data subject in California and the entire United States via our contact forms. Upon receipt of a verifiable request to delete a customer's personal information, Franklin Gold,

will delete the information and direct any service providers to delete the information from their records unless the business or service provider needs the information to:

- 10.) Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer;
- 11.) Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- 12.) De-bug to identify and repair errors within existing intended functionality;
- 13.) Exercise free speech, ensure the right of another consumer to exercise his/her right of free speech, or exercise another right provided for by law;
- 14.) Comply with the California Electronic Communications Privacy Act;
- 15.) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest;
- 16.) To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business;
- 17.) Comply with a legal obligation; or
- 18.) Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information

To make such a request, please send an email to:

corporate@franklin.gold or write us at:

Franklin Gold, 12121 Wilshire Blvd, Suite 810, Los Angeles, CA 90025

UPDATES TO THIS POLICY

If we change or update this Privacy Policy, we will post changes and updates on this website so that you will always be aware of what information we collect, use, and disclose. We encourage you to review this policy from time to time so you will know if it has been changed or updated. If you have any questions about the Privacy Policy, please contact us at 1-800-495-1979 or email us at: corporate@franklin.gold

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