Subject: Privacy

Purpose: To Establish a Policy Outlining the Treatment by GRF of Members’ Personal Identifying Information

In the regular course of business, the Golden Rain Foundation collects personal identifying information about members so that it may adequately service its members and the mutuals. For purposes of this Policy, personal identifying information includes, but may not necessarily be limited to names, addresses, telephone numbers, birth dates, drivers’ license numbers, and bank account numbers.

Golden Rain appreciates the sensitive nature of personal identifying information and understands the potential for its misuse. Golden Rain, therefore, will not disclose, for compensation or otherwise, any personal identifying information about its members and/or former members to any non-affiliated third party, without the authorization of the member/former member, except in response to a lawfully issued subpoena, court order, or as otherwise required by applicable law. Golden Rain only shares personal identifying information with affiliated third parties (e.g., the mutuals, independent contractors, etc.), when doing so is reasonably required in the regular course of Golden Rain business; and then only to the extent that the affiliated third party agrees to comply with this Policy.

In order to protect the personal identifying information it retains, Golden Rain will maintain suitable physical, electronic, and procedural safeguards that comply with generally accepted business standards.

Authority: Policy

4/29/10