

## COMPLIANCE NETWORKS BUSINESS PORTAL PRIVACY STATEMENT

Compliance Networks, LLC (“Compliance Networks” or “CN”) knows that you care about how your personal and business information is used and shared, and we take your privacy seriously. CN has created this privacy statement (“Statement”) in order to demonstrate our commitment to your privacy. By accessing the CN website at [www.compliancenetWORKS.com](http://www.compliancenetWORKS.com), including all related pages (the “Site”) and including any subscription based features or services offered by CN through the Site (collectively, the “Service”), you are accepting the practices outlined in this Statement.

### 1. What Does This Privacy Statement Cover?

This Statement covers CN’s collection and use of business and personal information that CN gathers when you are on the Site and when you use the Service. This Statement does not apply to the practices of third parties that CN does not own or control, or to individuals that CN does not employ or manage. For avoidance of doubt, this Statement does not apply to any third party information gathered by CN’s subscribers (*i.e.*, information about customers of CN subscribers) and submitted by them to the Service for use in connection with their activities (“Customer Data”). CN will not review, share, distribute, print, or reference any such Customer Data except as provided in any Service agreement or as may be required by law. Notwithstanding the foregoing, Customer Data may at times be viewed or accessed by CN for the purpose of resolving a problem, support issue, or for investigating a suspected violation of any agreement governing the Service, or as may be required by law.

### 2. What Personal Information About Customers Does CN Collect?

We collect the following types of information from our customers:

- a. Information You Provide to Us. CN collects identifying information when you use the Service or visit the Site. For example, we require customers who register to use the Service to give us the following personal information: their name, Company name, address, phone number, and e-mail address, and financial qualification and billing information, such as billing name and address, credit card number, and the identity of users within the organization that will be using the Service. When you initially express interest in obtaining additional information about the Service, or when you register for the Service, we may also ask for additional types of personal information, such as title, department name, fax number, or additional company information, such as annual revenues or marketing spend. We may also request demographic information and unique identifiers in order to provide you with a more personalized experience or verify your passwords.

All financial and billing information that we collect from you is used for the purpose of billing you for the Service. Such billing information is not used by CN for marketing or promotional purposes. CN may use a third-party intermediary to manage the credit card and billing processing. This intermediary is solely a link in the distribution chain, and is not permitted to store, retain, or use the information provided, except for the sole purpose of credit card and billing processing. If you are a registered user of CN’s subscription-based Service, please note that some information about you may remain in our records after the end of your trial or subscription.

b. Automatic Information:

We receive and store certain types of information whenever you interact with us via the Site. CN automatically receives and records certain “traffic data” on our server logs, including your IP address, CN cookie information, the page you requested, and your communications and interactions with CN and other Site registrants. CN uses this traffic data to help diagnose problems with its servers, analyze trends, and administer the Service.

We automatically collect usage information, such as the numbers and frequency of visitors to our Site and use of components of our Service. We may use this information to provide research, advice and information, including, without limitation, for benchmarking purposes (e.g. we may publish an industry white paper that uses data collected through the use of our Service). This data is only used in the aggregate. This type of collective data also enables us to figure out how often customers use parts of the Service so we can make the Service appealing to as many customers as possible. In addition, we may provide statistical information to our partners about how our customers, collectively, use our Site and Service. We may share this type of statistical data so that our partners also understand how often people use various areas of our Site and our Service, so that they, too, may provide you with an optimal experience.

We also collect and use information for internal purposes. For example, if you are a registered user of CN's subscription-based Service, we may keep records in your account history of your comments or complaints about the Service, and any reported violation of any Service agreement that you or someone on your account may have committed.

- c. E-mail Communications. We may receive a confirmation when you open an e-mail from CN if your computer supports this type of program, in order to help us make e-mails more interesting and helpful. We may also send out emails with information regarding CN or our partners including promotions and events. Customers can opt out of being contacted by us by sending an email to [portal@compliancenetWORKS.com](mailto:portal@compliancenetWORKS.com).
- d. Information From Other Sources. For purposes such as improving personalization of our Service, we may receive information about you from other sources and add it to our account information.

### **3. What about Cookies?**

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your Web browser to enable our systems to recognize your browser and tell us how and when pages in our site are visited and by how many people. CN employs cookies in order for its server to recognize a return visitor as a unique user. The cookies placed by the CN server are readable only by CN, and cookies cannot access, read, or modify any other data on a computer.

The “help” portion of the toolbar on the majority of browsers will direct you on how to prevent your browser from accepting new cookies, how to command the browser to tell you when you receive a new cookie, or how to fully disable cookies. We strongly recommend that you leave the cookies activated, however, because cookies enable you to take advantage of some of CN's most attractive features.

#### 4. Will CN Share Any of the Information it Receives?

Information about our customers is an integral part of our business. We do not rent, sell, or otherwise distribute your personal or business information to anyone. We share your information only with entities that control, are controlled by, or under common control with CN, and as described below:

- a. Affiliated Business We Do Not Control. We are affiliated or partnered with a variety of businesses and work closely with them. In certain situations, these businesses operate within the Service or through the Site. In other situations, CN markets or sells products or services jointly with affiliated businesses. We will plainly disclose any program where we intend to share your information with an affiliated business and give you the opportunity to decline to supply customer information or to opt out of such sharing.
- b. Agents. We employ other companies and people to perform tasks on our behalf and may need to share your information with them to provide products or services to you. Examples may include removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments, and providing customer service. We may also provide your information to agents who will use it to verify aggregate usage data that we provide to our partners. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to CN's privacy and customer data handling policies.
- c. Promotional Offers. We may send offers to certain customers on behalf of other businesses with whom we have a partnership. However, when we do so, we do not give the other business your name and address. If you are a registered user of the CN subscription-based Service and do not wish to receive these offers, please send an email to [portal@compliancenetWORKS.com](mailto:portal@compliancenetWORKS.com).
- d. Business Transfers. In some cases, we may choose to buy or sell assets or businesses. In these types of transactions, customer information is typically one of the business assets that are transferred. Moreover, if CN, or substantially all of its assets, were acquired, customer information would be one of the assets that are transferred.
- e. Protection of CN and Others. We may release information when we believe in good faith that release is necessary to: (i) comply with the law; (ii) enforce or apply our conditions of use and other agreements; or (iii) protect the rights, property, or safety of CN, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.
- f. With Your Consent. Except as set forth above, you will be notified when your personal information may be shared with third parties.

#### 5. Is My Information Secure?

All customer information collected and stored by CN is maintained in a secure corporate data center and/or otherwise subject to best practices access protection. Only employees who need customer information to perform a specific job (for example, a customer service representative) are granted access to it. All of our employees are kept up to date on our privacy and security practices.

## **6. How can I correct or remove information about Me or My Business?**

If you feel that any personal information about you that has been collected and stored by CN might be wrong, or you would like for us to remove you from our systems, please notify us at [portal@compliancenetWORKS.com](mailto:portal@compliancenetWORKS.com) so that we may correct or delete the information.

## **7. What Choices Do I Have?**

As stated previously, you can always opt not to disclose information, even though it may be needed to make a purchase or take advantage of certain CN features. You are able to add or update certain information as described in the “How can I correct or remove information about Me or My business” section above. When you update information, however, we may maintain a copy of the unrevised information in our records.

## **8. Conditions of Use**

If you decide to visit the CN Site, your visit and any possible dispute over privacy is subject to this Statement and any other applicable agreement between CN and you or your company, including limitations on damages, arbitration of disputes, and application of Texas law.

## **9. Third Party Sites**

The Service may permit you to link to other websites on the Internet, and other websites may contain links to the CN Site. Those other websites are not under CN control, and such links do not constitute an endorsement by CN of those other websites or the services offered through them. The privacy and security practices of websites linked to or from the CN site are not covered by this Privacy Statement, and CN is not responsible for the privacy or security practices or the content of such websites.

## **10. Changes to this Statement**

CN may amend this Statement from time to time. Use of information we collect now is subject to the Statement in effect at the time such information is used. If we make changes to our Statement, we will notify you by posting the revised notice on our Site or sending you an email so you are always aware of what information we collect, how we use it, and under what circumstances, if any, it is disclosed. You are responsible for maintaining your awareness of any such amendments to this Statement as so posted or noticed.

## **11. Questions or Concerns**

If you have any questions or concerns regarding privacy at CN's Site, please email us at [portal@compliancenetWORKS.com](mailto:portal@compliancenetWORKS.com).

Privacy Policy Effective Date: 02/01/2012