

# AdminiTrack Online Privacy Policy

(Last updated 11/02/2011)

To underscore our commitment to privacy we have adopted an online privacy policy for [www.adminitrack.com](http://www.adminitrack.com). This site is operated by AdminiTrack Inc. ("AdminiTrack"), 2221 Peachtree Road Northeast, Suite D629, Atlanta, GA 30309, [compliance@adminitrack.com](mailto:compliance@adminitrack.com). This policy reflects and implements---in an online setting---our corporate privacy principles. This site is not directed at children.

## INFORMATION COLLECTION

### • Personally-identifiable information (PII)

Personally-identifiable information collected with your consent may include, for example, name, mailing address, e-mail address, telephone number, user id and password (if you have one), information that you may supply in connection with applying for an account with us, information about orders you place, any responses you choose to provide to survey questions, or any inquiries you may make through our Web site. We do not share, sell, rent or trade PII with third parties for their promotional purposes.

### • Cookies

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. This site uses first and third party cookies (session and persistent), however personally identifiable information is not collected through the use of cookies, except as described in the "Personally-identifiable Web site Activity Monitoring" section below. Cookies are used to determine whether a visitor is unique or whether a visitor has viewed our site before. Cookies are also used in sections of this site which require user log-in to authenticate and validate users and to determine whether a user's session is active or has timed-out. While most browsers are set to accept cookies by default, you can set yours to refuse cookies or to alert you before accepting them. Your browser manufacturer has information on changing the default setting for your specific browser. Some sections of the site or application service may not function properly when cookies are refused.

### • Personally-identifiable Web site Activity Monitoring

In the case of visitors to our Web site, who either (i) submit inquiries to us via Web Forms or (ii) have been directed to our Web site after clicking on a link in marketing e-mail from us, we may use software to connect such information submitted to us (such as e-mail addresses and contact information) with the IP address and cookie on the computer that has submitted the information to us (see "Cookies" above for a further description of cookies). Once a visitor has submitted a Web Form to us or clicked on a particular link in a marketing e-mail from us, we may maintain a personally-identifiable record of certain information about their visits to our Web site, such as the pages viewed on our Web site, the time of the visit, the order of pages accessed and the amount of time spent on each page. We may combine this information with other information about you or your company. We use this information to better tailor the marketing of our products and services to you; we do not sell or share personally-identifiable Web site activity information to third parties. If you would prefer that we not link your personally identifiable information with data from your visits to our Web site you have several options:

- Disable cookies in your Web browser. If you disable cookies, you would need to do so from each computer that you use to access our site; or
- Email us at [support@adminitrack.com](mailto:support@adminitrack.com) to opt out of personally-identifiable Web monitoring on our Web site.

If you opt-out, we still reserve the right to collect non-personally identifiable information about your visits to our Web site, as described in the "Nonpersonally-identifiable information" section, below.

### • Nonpersonally-identifiable information

This site also collects nonpersonally-identifiable information. For example, as you browse this Web site we may collect information about your visit, but not about you personally. Via Web server logs, for example, we may monitor statistics such as: the number of people that visit our site, which page(s) are visited on our site, from which domain our visitors come (e.g., aol.com, hotmail.com, etc.), and which browsers people use to visit our site (e.g., Netscape Navigator, Microsoft Internet Explorer, etc.). Our Web site uses outsourcing programs to assist us in analyzing this data to better tailor our Web site.

## INFORMATION USE

The information collected by this Web site is used only for responding to your inquiries and otherwise corresponding with you, for processing transactions you request, maintaining your account (if you have one), for other purposes permitted by your organization's subscriber agreement(s) (if any), and for the administration, review and/or the improvement the content of our Web sites.

We may contact you in response to your comments or inquiries, as part of the maintenance of your account with us (if you have one), or in order to complete a transaction that you requested.

We may also contact you to inform you of other products or services we believe may be of interest to you, but we will offer you an opportunity not to receive such communications.

## ONWARD TRANSFER

We may disclose information you provide to us to third parties in order to complete a transaction that you requested or as otherwise permitted by your organization's subscriber agreement(s) (if any).

We may also outsource some tasks, including the operation of certain Web site functions that require access to information you supply online and information about your visits to our Web site. In such cases, however, we require that the companies acting on our behalf abide by our privacy policy and institute safeguards to protect the confidentiality of your information.

If our company or our assets are acquired by another company, that company will assume responsibility for the personal information collected by us through this Web site and it will assume the rights and obligations regarding the information collected through this Web site, as described in this privacy policy.

Finally, please note that we may disclose personal information when required by law or in the good faith belief that such action is necessary in order to comply with the law or legal process.

#### **SECURITY**

We take steps to protect against the loss, misuse, or unauthorized alteration of personally-identifiable information collected through this Web site. We recognize the importance of security for all personally-identifiable information collected by our Web site. We exercise care in providing secure transmission of your information from your PC to our servers.

Once we receive personally-identifiable information, we take steps to protect its security on our systems. In the event we request or transmit sensitive information, such as credit card information, we use industry standard, secure socket layer ("SSL") encryption.

We limit access to personally-identifiable information to those employees who need access in order to carry out their job responsibilities.

#### **ADHERENCE TO SAFE HARBOR PRINCIPLES**

AdminiTrack complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. AdminiTrack has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view AdminiTrack's certification, please visit <http://www.export.gov/safeharbor/>.

#### **POLICY CHANGES**

We may revise this online privacy policy from time to time. Material changes will be highlighted on our home page when posted.