

# PTI MARKETING TECHNOLOGIES<sup>®</sup> Privacy Policy

PTI Marketing Technologies ("PTI") respects your privacy and we are committed to protecting it. We recognize your need for appropriate protection and management of the Personal Information we learn about you while you visit the Websites located at <u>www.pti.com</u> and <u>www.marcom.com</u> (and any other sites owned by PTI that link to this policy) (the "Website ") and our suite of PTI Marketing Technologies Application software ("PTI Software"). This privacy policy lets you know how we collect, store, use, and disclose that information. The information that we receive depends on what you do during your visit and use, and what service(s) you request.

## User Consent

By submitting Personal Information through our Website or PTI Software, you expressly consent to the processing of your Personal Information in accordance with this Privacy Policy.

#### **European Union Users**

YOUR PERSONAL INFORMATION MAY BE PROCESSED IN THE COUNTRY IN WHICH IT WAS COLLECTED AND IN OTHER COUNTRIES, INCLUDING THE UNITED STATES, WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY. WE ADHERE TO AND HAVE CERTIFIED OUR COMPLIANCE WITH THE SAFE HARBOR PRIVACY PRINCIPLES, INCLUDING NOTICE, CHOICE, ONWARD TRANSFER, SECURITY, DATA INTEGRITY, ACCESS, AND ENFORCEMENT, OF THE UNITED STATES/EUROPEAN UNION DATA PROTECTION SAFE HARBOR FRAMEWORK AND THE UNITED STATES/SWITZERLAND DATA PROTECTION SAFE HARBOR FRAMEWORK, BOTH OF WHICH ARE MADE AVAILABLE BY THE U.S. DEPARTMENT OF COMMERCE AT HTTP://WWW.EXPORT.GOV/SAFEHARBOR. OUR CERTIFICATION CAN ALSO BE VIEWED AT HTTP://WWW.EXPORT.GOV/SAFEHARBOR.

## **Collection and Use of Your Information**

Customers and individuals who use the Website or PTI Software are hereafter collectively called "Users". Content and information transmitted by Users to or through the Website or PTI Software and Users' Personal Information are collectively called "Customer Information."

#### **Personal Information**

When you register for the Website or the PTI Software, request services or information, place an order, submit feedback, participate in a forum or survey, or otherwise use the Website or PTI Software, we may ask you for and collect personal information such as your name, address, email address, telephone number, employee identification number, and other similar identifying information ("Personal Information").

In general, we may use the Personal Information you submit to us to create your account on our network; identify you as a user in our system; administrate, operate, maintain and improve our Website and PTI Software; send you a welcome e-mail to verify the username and password provided when your account was created; send you administrative e-mail notifications, such as security or support and maintenance advisories; respond to your inquiries related to employment

Page 1 of 4

Last Updated 22-Dec-14

**CONFIDENTIAL/PROPRIETARY**. The material contained in this document is the confidential information of PTI Marketing Technologies® and contains proprietary intellectual property of the company. Any and all use of any of the material contained in this document is limited to the purpose(s) expressly permitted in writing by PTI Marketing Technologies®.



opportunities or other requests; to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and to make telephone calls to you, from time to time, as a part of our support and maintenance services.

You may send requests to correct or update any of your Personal Information at the email address set forth below. Please be aware, however, even if we update your Personal Information in our contact list, or we remove such information, it may still be stored in other databases (including those kept for archival purposes) and may still be used to compile aggregated or demographic information for supply to third parties in accordance with this privacy policy. We do not send you information unless you request it or we reasonably believe that the information would benefit you or your business. If you do not want to receive further information from us, contact us at the email address listed in the Feedback; Removal from Contact List section below, and request to be removed from the contact list.

#### Non-Identifying Information

As is true of most websites and online services, we gather certain information automatically and store it in log files. This information includes your operating system type, browser type, IP address, domain name, and date/time stamp. We use this information to help us evaluate and improve our Website or PTI Software, analyze trends, track User's movements around the Website, and for marketing and investment analysis. We may share this information with third parties in aggregate statistical form that includes no Personal Information.

#### Use of "Cookies" and "Web Beacons"

Cookies are small files that many web sites place on your hard drive that allow such web sites to identify you. The use of cookies is a standard and common practice of many web sites. For example, in order to allow a site to remember your login name or password, the site may place a cookie on your computer. We may place cookies on your computer to allow us to identify you during future visits to our Website. We may use cookies to measure Web traffic, to offer you certain services and to customize your visit. However, if you do not wish to receive cookies, or want to be notified of when they are placed, your browser may permit you to do so. In many browsers, you can change the browser settings to warn you before accepting cookies or to block cookies. If you block cookies, you may not be able to use certain site features or functions, or the Website may not operate in an optimal mode.

Web beacons are digital images we use to log information on our Website and in our emails. We use web beacons to manage cookies, count visits, and to learn what marketing works and what does not. We also use web beacons to tell if you open or act on our emails.

#### How We Respond to Do Not Track Signals

Some web browsers may transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise our policy on responding to these signals.

#### Marketing and Analytics Companies



We may work with certain marketing companies that assist in marketing our services to you on third party websites. These companies may collect information about online activities conducted on a particular computer, browser or device over time and across third-party websites or online services for the purpose of delivering advertising that is likely to be of greater interest to you. Currently, we work with Google AdWords. This is not intended to be a comprehensive list and we may stop working with this company and work with others without notice. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: <a href="http://www.aboutads.info/choices">http://www.aboutads.info/choices</a>. To better understand how they use your information, please see the privacy policies available on their respective websites.

We may work with certain third party analytics companies that collect information anonymously and report website trends without identifying individual visitors. These services allow us to view a variety of reports about how visitors interact with the Website so we can improve the Website and understand how people find and navigate it. Currently, we work with Google Analytics. This is not intended to be a comprehensive list and we may stop working with this company and work with others without notice. You can learn more about how these companies collect, use and share information about you by visiting their websites.

## Security

PTI uses commercially reasonable efforts to protect the Website and PTI Software and to prevent unauthorized access, use, and disclosure of Customer Information. Users have a password that must be used each time a User logs-in to the PTI Software or the Website. Users may change their password at any time. PTI strongly urges Users not to share their passwords with others, and not to use the same password(s) that you use on the Website and PTI Software with other online services. Also, PTI strongly recommends that each User log-out completely after User is finished using the PTI Software or Website. Unfortunately, no data transmission over the Internet can be guaranteed to be secure, and every system that allows online access is potentially vulnerable to outside attacks from unauthorized third parties. As a result, while PTI strives to protect Customer Information, PTI can't and doesn't guarantee or warrant the security of any Customer Information User transmits to PTI, and User does so entirely at User's own risk.

## Linked Sites

Our Website and PTI Software may link to other web sites not controlled by PTI. We are not responsible for the privacy or security practices of any other web sites, and you acknowledge and agree that any visits to or use of such other web sites is entirely at your own risk. You should carefully review the privacy and security practices of the other web sites before you provide such web sites with any of your Customer Information.

#### **Other Disclosures**

Except as otherwise stated in this policy, we do not generally share the Personal Information collected from our services with other entities. We may share your Customer Information with third party contractors or service providers to provide you with the services that we offer you through our Website and PTI Software. These third party contractors or service providers are required not to use your Personal Information other than to provide the products or services requested by us.

Last Updated 22-Dec-14

**CONFIDENTIAL/PROPRIETARY**. The material contained in this document is the confidential information of PTI Marketing Technologies® and contains proprietary intellectual property of the company. Any and all use of any of the material contained in this document is limited to the purpose(s) expressly permitted in writing by PTI Marketing Technologies®.

Page 3 of 4



PTI may disclose Customer Information if it believes such disclosure is necessary to (a) comply with laws or to respond to lawful requests and legal process; or (b) protect or defend the rights, safety, or property of PTI, users of the Website or PTI Software, or any person including to enforce our agreements, policies, and terms of use; or (c) in an emergency to protect the personal safety of any person.

We may also share Customer Information in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company.

We may also share de-identified and aggregated data with others for their own uses.

## **Changes to the Privacy Policy**

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will notify you by sending you an e-mail to the last email address you provided to us and/or by prominently posting notice of the changes on our Website. Any material changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our site. These changes will be effective immediately for new users of our Website, PTI Software or related services. Please note that at all times you are responsible for updating your Personal Information to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. In any event, changes to this Privacy Policy may affect our use of Personal Information that you provided us prior to our notification to you of the changes. If you do not wish to permit changes in our use of your Personal Information, you must notify us prior to the effective date of the changes that you wish to deactivate your account with us. Continued use of our Website, PTI Software, or related services, following notice of such changes shall indicate your consent to such changes.

## **Dispute Resolution**

If you believe that PTI has not adhered to this Statement, please contact PTI by e-mail at legal@pti.com. We will do our best to address your concerns. If you feel that your complaint has been addressed incompletely, we invite you to let us know for further investigation. If you and PTI are unable to reach a resolution to the dispute, you and PTI will settle the dispute exclusively under the rules of the American Arbitration Association (www.adr.org).

## Contact Us; Removal from Contact List

If you have a question or comment about the Website and/or PTI Software, or wish to update your contact information or be removed from our contact list, please email us at http://www.pti.com/contact/.

Page 4 of 4

Last Updated 22-Dec-14

**CONFIDENTIAL/PROPRIETARY**. The material contained in this document is the confidential information of PTI Marketing Technologies® and contains proprietary intellectual property of the company. Any and all use of any of the material contained in this document is limited to the purpose(s) expressly permitted in writing by PTI Marketing Technologies®.