

**DISCLAIMER**

This document is subject to copyright and may not be used by any person without the express written consent of Wedge Information Technology Lawyers.

Further, this document does not constitute legal advice and **MUST NOT** be used as a substitute for the advice of a lawyer qualified to give advice in the particular areas of law to which this document relates, even if the consent mentioned previously has been granted, as it is very "general" in form, requiring customization to make it appropriate to the ever-changing law, and to the facts and understandings relating to the parties in any given case.

**PRIVACY POLICY**

This privacy statement discloses the privacy practices of \_\_\_\_\_ ("Site Owner") with regard to its website at InternetAddress (the "Site").

Site Owner agrees to notify you of:

1. What personally identifiable information of yours or of any third party is collected from you through the web site;
2. The organization collecting the information;
3. How the information is used;
4. With whom the information may be shared;
5. What choices are available to you regarding collection, use and distribution of the information;
6. The kind of security procedures that are in place to protect the loss, misuse or alteration of information under Site Owner control; and
7. How you can correct any inaccuracies in the information.

If you feel that Site Owner is not abiding by its posted privacy policy, you should first contact *[insert name of contact person/group responsible for such inquiries]*

**By mail:** \_\_\_\_\_

\_\_\_\_\_

**By phone:** \_\_\_\_\_

**By email:** \_\_\_\_\_.

**WHAT INFORMATION IS COLLECTED**

This section sets out what information we collect, explains why we need such information and, with respect to such information, what we will do with it.

## **Registration**

In order to use this website, a user must first complete the registration form. During registration a user is required to give their contact information (such as name and email address). This information is used to contact the user about the services on our site for which they have expressed interest. It is optional for the user to provide demographic information, and unique identifiers, but encouraged so we can provide a more personalized experience on our site.

## **Use of the Site**

If you choose to use the services set out in this site, we will collect information about your purchasing behavior. We may also collect comments provided by other users in our feedback area. This information is aggregated and statistics are generated from it, on a purely anonymous basis. To clarify, we DO NOT resell information about your individual buying habits.

We may collect certain information from you, like your billing address and other specific financial information, collected directly or from transaction documents used in the process so as in order to establish the financial resources necessary to conclude the transaction.

## **Surfing habits**

We use IP addresses to analyze trends, administer the site, track users' movements, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## **Order**

We also request information from the user on our order form. Here a user must provide contact information (like name and shipping address) and financial information (like credit card number, expiration date). This information is used for billing purposes and to fill user's orders. If we have trouble processing an order, this contact information is used to get in touch with the user.

## **Newsletter**

If a user wishes to subscribe to our newsletter, we ask for contact information such as name and email address.

## **Surveys & Contests**

From time-to-time our site requests information from users via surveys or contests. Participation in these surveys or contests is completely voluntary and the user therefore has a choice whether or not to disclose this information. Information requested may include contact information (such as name and shipping address), and demographic information (such as zip code, age level). Contact information will be used to notify the winners and award prizes. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site.

## **Tell-A-Friend**

If a user elects to use our referral service for informing a friend about our site, we ask them for the friend's name and email address. Site Owner will automatically send the friend a one-time email inviting them to visit the site. Site Owner stores this information for the sole purpose of

sending this one-time email. The friend may contact Site Owner at *[insert contact information]* to request the removal of this information from their database.

### **Supplementation of Information**

In order for this website to properly fulfill its obligation to our customers, it is necessary for us to supplement the information we receive with information from 3rd party sources.

For example, to determine if our customers qualify for one of our credit cards, we use their name and social security number to request a credit report. Once we determine a user's credit-worthiness, this document is destroyed.

## **WHAT DO WE DO WITH THAT INFORMATION**

This section sets out, generally, what we do with the information we collect from you. This section also tells you how to let us know if you want that information deleted or changes.

### **Our Use of Information**

We will not sell, share, or rent this information to others in ways different from what is disclosed in this statement. Site Owner collects information from our users at several different points on our website as further described in this privacy policy under the heading **WHAT INFORMATION IS COLLECTED**. Site Owner will not disclose your personal information or any other information related to your personal profile other than with your express consent. However, please be advised that Site Owner cooperates with all law enforcement inquiries and with third-parties who are enforcing their intellectual property or other proprietary rights and where required by law, will disclose your personal information to appropriate authorities.

### **Sharing**

We may share aggregated demographic information with our partners and advertisers. This is not linked to any personal information that can identify any individual person.

### **Special Offers**

We send all new users a welcoming email to verify password and username. Registered users who have specifically requested such information will occasionally receive information on products, services, special deals, and a newsletter. Out of respect for the privacy of our users we present the option to not receive these types of communications.

### **Site and Service Updates**

We also send the user site and service announcement updates. Users are not able to un-subscribe from service announcements, which contain important information about the service. We communicate with the user to provide requested services and in regards to issues relating to their account via email or phone.

### **Removal of or Correcting Personal Information:**

Please contact us at any time if you want any information specifically about you removed from our database. Please also contact us if you want to correct or update your personal information as contained in our database.

If a user's personally identifiable information changes (such as your zip code), or if a user no longer desires our service, we will endeavor to provide a way to correct, update or remove that user's personal data provided to us. This can usually be done at the member information page or by emailing our Customer Support at *[insert contact information]*.

## MISCELLANEOUS

This section sets out other conditions and aspects of our use of your personal information and terms under which we keep such personal information private.

### Ownership

You own any and all personally identifiable information you elect to provide us or collected by us.

We generate and accumulate high-level statistical or trend-based information relative to this web site. Such information is anonymous and will not identify you on a personal basis. We own such information.

### Cookies

A cookie is a piece of data stored on the computer hard drive or memory containing information about the user. Usage of a cookie is in no way linked to any personally identifiable information while on our site. Once the user closes their browser, the cookie simply terminates. For instance, by setting a cookie on our site, the user would not have to log in a password more than once, thereby saving time while on our site. If a user rejects the cookie, they may still use our site. The only drawback to this is that the user will be limited in some areas of our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site.

Some of our business partners use cookies on our site (for example, advertisers). However, we have no access to or control over those cookies.

### Choice/Opt-out

Our users are given the opportunity to 'opt-in' to having their information used for purposes not directly related to our site at the point where we ask for the information. For example, our order form has an 'opt-in' mechanism so users who buy a product from us, and want marketing material, can elect to have their email address placed on our lists.

Users who no longer wish to receive our newsletter or promotional materials from our partners may opt-out of receiving these communications by replying to unsubscribe in the subject line in the email or email us at *[insert contact information]*.

Users of our site are always notified when their information is being collected by any outside parties. We do this so our users can make an informed choice as to whether they should proceed with services that require an outside party, or not.

### **Links**

This web site contains links to other sites. Please be aware that Site Owner is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by this site.

### **Security**

Site Owner takes every precaution to protect our users' information. When users submit sensitive information via the website, your information is protected both online and off-line.

When our registration/order form asks users to enter sensitive information (such as credit card number and/or social security number), that information is encrypted and is protected with the best encryption software in the industry - SSL. Any user information or credit card information stored on our database is also encrypted while stored.

While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Our employees must use password-protected screen-savers when they leave their desk. When they return, they must re-enter their password to re-gain access to your information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure our customers' information is protected. Finally, the servers that we store personally identifiable information on are kept in a secure environment, in a locked cage.

If you have any questions about the security at our website, you can send an email to *[insert contact information]*.

### **Notification of Changes**

If we decide to change our privacy policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it, and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.