

**ALINEAN, Inc.**  
**End User Privacy Policy**

ALINEAN is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. ALINEAN knows that you care how information about you is used and shared, and appreciates your trust. This ALINEAN Statement of Privacy applies to, and governs data collection and usage at all ALINEAN sites and services. By visiting ALINEAN domains, you are accepting the practices described in this Privacy Notice.

**What this Privacy Policy Covers**

This Privacy Policy covers ALINEAN'S treatment of information that ALINEAN collects when you using either ALINEAN's applications or services. This policy also covers ALINEAN's treatment of all personally identifiable information including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information.

ALINEAN follows the U.S.-EU and U.S.-Swiss Safe Harbor Privacy Principles published by the U.S. Department of Commerce (the "Principles") with respect to all such data. If there is any conflict between the policies in this privacy policy and the Principles, the Principles shall govern. To learn more about the Safe Harbor program, and to view ALINEAN's certification, please visit <http://www.export.gov/safeharbor/>

This policy does not apply to the practices of companies that ALINEAN does not own or control that may be accessible from ALINEAN web sites, or to people that ALINEAN does not directly employ or manage. ALINEAN suggests contacting those sites directly for information on their privacy, security, data collection, and distribution policies.

**Definitions:**

"Personal Information" or "Information" means information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual. Personal information may include information that can identify you, such as your name, address, telephone number, e-mail address, and other similar information.

"Anonymous Information" means information that cannot be used to personally identify you, such as the industry in which you work or the region in which your primary office is located.

"Sensitive Personal Information" means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health. ***Due to the nature of our business, ALINEAN does not collect or maintain sensitive personal information.***

**Notice**

ALINEAN will inform an individual of the purpose for which it collects and uses Personal Information, and the types of third parties to which the Company discloses or may disclose that Information. ALINEAN will provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to ALINEAN, or as soon as practicable thereafter, and in

any event before ALINEAN uses or discloses the Information for a purpose other than for which it was originally collected.

### **Choice**

ALINEAN will offer individuals the opportunity to choose whether their Personal Information can or cannot be disclosed to a third party.

### **Information You Give Us**

**Registration Information:** Some of the features on the site require registration before you can use them. If you register to use the site, you choose to provide us with certain personal information such as your name, address, e-mail address and telephone number and agree to the Terms and Conditions governing this site.

**Service & Transaction Information:** When you use a password or a similar identifier to access the site, ALINEAN will recognize your identifier and may collect various categories of information about you such as information you give us, data related to your use of the site and its services (such as calculators, analyses, and other features), and information about your transactions, interactions, and communications with us.

For administrative purposes, ALINEAN will from time to time, communicate with you via e-mail. E-mail is used to reset passwords or inform you of system events such as collaboration and system status.

### **Automatic Information**

ALINEAN receives and store certain types of information from its web server logs whenever you login. Examples of the information collected and analyzed include the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information such as browser type and version, operating system, and platform; the full Uniform Resource Locators (URL) click stream to, through, and from our web site, including date and time; cookie number; products you viewed or searched for.

ALINEAN uses cookies when your browser accesses ALINEAN. Cookies are alphanumeric identifiers that are transferred to your computer's hard drive through your web browser to enable our systems to recognize you; to provide the session persistence; and to authenticate you as you browse the site. You have the ability to accept or decline cookies through settings in your web browser. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you will not be able to fully experience the interactive features of the ALINEAN web sites you visit.

### **What does ALINEAN do with the Information it receives?**

ALINEAN uses information to customize the content you see and to fulfill support requests for certain products and services.

ALINEAN may also collect Personal Information and Anonymous Information as an agent for clients who develop and deploy tools in the ALINEAN SaaS environment. The purpose for collecting Personal Information and Anonymous Information may include (but are not limited to) providing customized content to individuals; providing estimation of benefits, costs, and return on investment; providing

assessments; and providing information that will assist ALINEAN's client with developing customized, high-value solutions for individuals that supply their Personal and Anonymous information.

### **How Secure Is Information I Provide?**

ALINEAN secures your personal information from unauthorized access, use or disclosure. ALINEAN secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. Your ALINEAN Account Information is password-protected for your privacy and security and the most sensitive information such as passwords are stored using modern encryption techniques. ALINEAN protects the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts all information that you input.

All security features are useless without due diligence on the part of you the end user. Be sure to close your web browser after logging off ALINEAN web sites and choose passwords that combine letters (upper and lower case), numbers, and special characters.

### **Data Integrity**

ALINEAN will only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, ALINEAN will take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

### **Access**

ALINEAN will allow an individual access to their Personal Information and allow the individual to correct or amend inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

### **Enforcement**

ALINEAN uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the American Arbitration Association (<http://www.adr.org>) as a third party resolution provider.

### **Information Subject to Other Policies**

ALINEAN is committed to following the Principles for all Personal Information within the scope of the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks. However, certain information is subject to policies of the Company that may differ in some respects from the general policies set forth in this privacy policy.

ALINEAN reserves the right to share your Personal Information to respond to duly authorized information requests of governmental authorities or where required by law. In exceptionally rare

circumstances where national, state or company security is at issue (such as with the World Trade Center terrorist act in September, 2001), ALINEAN reserves the right to share our entire database of visitors and clients with appropriate governmental authorities.

ALINEAN may also provide your Personal Information to a third party in connection with the sale, assignment, or other transfer of ALINEAN's business to which the information relates, in which case we will require any such buyer to agree to treat Your Information in accordance with this Privacy Policy.

**Additional Questions and Contact Information**

Should you have further questions, comments, or any concerns about this policy, please contact ALINEAN directly at [info@alinean.com](mailto:info@alinean.com).

Questions, comments or complaints regarding the Company's Safe Harbor Policy or data collection and processing practices can also be mailed to:

ALINEAN, Inc.  
111 North Magnolia Avenue  
Suite 1050  
Orlando, FL 32801

We may update this Privacy Policy from time to time. When we do update it, for your convenience, we will make the updated policy available on the ALINEAN websites.

Last Updated: September, 2012