# Adaptive Business Management Systems Privacy Policy

Updated policy: Effective on July 01, 2013

This privacy statement describes how Adaptive Business Management Systems collects and uses the personal information you provide on our Web site: www.adaptivebms.com . It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

If you have questions or concerns regarding this statement, you should first contact support@adaptivebms.com .

Adaptive Business Management Systems complies with the EU Safe Harbor framework as set forth by the Department of Commerce regarding the collection, use, and retention of data from the European Union

### Collection and Use of Personal Information

We collect the following personal information from you

- Contact Information such as name, email address, mailing address, phone number
- Unique Identifiers such as user name, account number, password

As is true of most Web sites, we automatically gather information about your computer such as your IP address, browser type, referring/exit pages, and operating system.

When we collect information by means of you voluntarily submitting it to us, we will notify you as to why we are asking for it and how it will be used. Set out in this Policy are some of the circumstances when we might collect personal data and what it may be used for.

We require customers who register to use the services offered on our Site (collectively, the "Service") to give us an email address.

We use this information to

- Fulfill your order
- Send you an order confirmation
- Assess the needs of your business to determine suitable products
- Send you requested product or service information
- Send product updates or warranty information
- Respond to customer service requests
- Administer your account
- Respond to your questions and concerns

This Policy applies only to personal information that we collect from you. We provide a service from our

web site that permits users to share information with each other by creating, uploading, and attaching information to shared "tasks" that are stored on our web site. This Policy does not apply to personal information that you share with other users when you submit or upload it to these shared tasks. Instead, our use and distribution of information submitted to tasks is described in our Master Service Agreement.

## Choice/Opt-Out

Customers can opt out of being contacted by us, or receiving such information from us, by following the opt out instructions located in the e-mails we may send you, by changing your privacy settings in the Service, or by contacting us at any time.

Adaptive Business Management Systems reserves the right to send its existing customers certain communications relating to the Service as part of our commercial relationship with you, such as service announcements and administrative messages without offering the opportunity to opt out of receiving them. If you do not wish to receive them, you have the option to cancel your account by logging in to your Adaptive Business Management Systems account, accessing the Account Admin menu, and clicking the Cancel Account link.

## **Testimonials**

We post customer testimonials on our web site which may contain personally identifiable information such as the customer's name. We do obtain the customer's consent prior to posting the testimonial to post their name along with their testimonial. If you want to remove your personal information that is being displayed on our website under public pages please send your request to support@adaptivebms.com .

# Information Sharing

Except as we explicitly state at the time we request information we do not disclose to third parties the information provided. We do not sell your personal information to third parties.

Adaptive Business Management Systems uses a third-party intermediary to manage the credit card 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 processing. Other third parties, such as content providers, may provide content on the Site but they are not permitted to collect any information nor does Adaptive Business Management Systems share user information with these parties.

Customers of the Service will be using the Site to host data and information ("Data"). Adaptive Business Management Systems will not review, share, distribute, print, or reference any such Data except as provided in the Adaptive Business Management Systems Master Subscription Agreement or as provided herein, or as may be required by law such as to comply with a subpoena, or similar legal process.

Individual records may at times be viewed or accessed for the purpose of resolving a problem, support issue, or suspected violation of the Master Subscription Agreement, or as may be required by law. Of course, customers are responsible for maintaining the confidentiality and security of their user registration and password.

# Third Party E-Commerce Solutions Provider

Our shopping cart is hosted by our e-commerce solutions provider. They host our ordering system, and collect your billing information directly from you for the purpose of processing your order. This company does not use this information for any other purpose.

## Cookies and Other Tracking Technologies

We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit http://www.aboutcookies.org for detailed guidance.

The list below describe the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete the cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

#### FIRST PARTY COOKIES

These are cookies that are set by this website directly.

Google Analytics: We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

You can find out more about Google's position on privacy as regards its analytics service at http://www.google.co.uk/intl/en/analytics/privacyoverview.html

More information on session cookies and what they are used for at http://www.allaboutcookies.org/cookies/session-cookies-used-for.html

#### THIRD PARTY COOKIES

These are cookies set on your machine by external websites whose services are used on this site. Cookies of this type are the sharing buttons across the site allow visitors to share content onto social networks. Cookies are currently set by Digg, Google+ and Twitter. In order to implement these buttons, and connect

them to the relevant social networks and external sites, there are scripts from domains outside of our website. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on this website.

You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

#### LOG-IN FOR CLOUD-BASED APPLICATIONS

We use a session cookie to remember your log-in if you are a user of any of our cloud-based applications (e.g. CAPA Manager). This we deem strictly necessary to the working of the website. If these are disabled then various functionality on the site will be broken.

## Links to Other Web Sites

Our Site includes links to other Web sites whose privacy practices may differ from those of Adaptive Business Management Systems. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any Web site you visit.

# Widgets

Our Web site includes Widgets, which are interactive mini-programs that run on our site to provide specific services from another company (e.g. displaying the news, opinions, music, etc). Personal information, such as your email address, may be collected through the Widget. Cookies may also be set by the Widget to enable it to function properly. Information collected by this Widget is governed by the privacy policy of the company that created it.

# Security

When we collect personal information directly from you, we follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore we cannot guarantee its absolute security. If you have any questions about security on our Web site, you can contact us at support@adaptivebms.com .

In order to make a purchase from us, you must use our shopping cart provider to finalize and pay for your order. Its privacy statement and security practices will also apply to your information. We encourage you to read that privacy statement before providing your information.

## **Opt-Out Policy**

Adaptive Business Management Systems offers its visitors and customers a means to choose how we may use information provided. Any time after registering for information or ordering the Service, you may change your mind about receiving information from us or about sharing your information with third parties. You may notify us of your change in preference using the Personal Settings menu within the application, or by sending an email to support@adaptivebms.com .

## Additional Policy Information

Our Web site includes Widgets, which are interactive mini-programs that run on our site to provide specific services from another company (e.g. displaying the news, opinions, music, etc). Personal information, such as your email address, may be collected through the Widget. Cookies may also be set by the Widget to enable it to function properly. Information collected by this Widget is governed by the privacy policy of the company that created it.

Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

# Updating/Accessing/Amending/Correcting Personally Identifiable Information

If your personally identifiable information changes, or if you no longer desire our service, you may correct, update, amend, delete/remove or deactivate it by emailing our Customer Support at support@adaptivebms.com We will respond to your request to access within 5 days.

## Notification of Privacy Statement Changes

We may update this privacy statement to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contact Information**

Questions regarding this Policy or the practices of this Site should be directed to Adaptive Business Management Systems Security Administrator by regular mail addressed to support@adaptivebms.com, Inc., Attn: Security Administrator.