

## PRIVACY STATEMENT

Clicktools Limited, its subsidiaries and affiliates ("Clicktools") is committed to maintaining and protecting your privacy. This commitment is based on the following principles:

- Clicktools will request you to provide and maintain the minimum amount of information required for us to provide our service to you.
- Clicktools will never sell or pass on your details to a 3rd party.
- Clicktools operates on an 'opt-in' basis and will occasionally send you marketing details and research surveys. [Should you wish to not receive these mailings simply email [info@Clicktools.com](mailto:info@Clicktools.com) with 'Unsubscribe' in the subject field.]
- Clicktools processes personal data in accordance with Data Protection Act, 1998. Clicktools is registered with the UK Information Commissioner's Office. Our registration number is Z2422900. Clicktools Inc (A wholly owned subsidiary of Clicktools Ltd) adheres to the US-EU Safe Harbor Privacy Principles.

This document outlines Clicktools privacy policy and tells you:

- What personally identifiable information of yours or third-party personally identifiable information is collected from you through the web site.
- The organisation collecting the information.
- How the information is used.
- With whom the information may be shared.
- What choices are available to you regarding collection, use and distribution of the information.
- The kind of security procedures that are in place to protect the loss, misuse or alteration of information under Clicktools control.
- How you can correct any inaccuracies in the information.

If you have questions or concerns regarding this statement, you should contact Clicktools' security administrator by email at [info@Clicktools.com](mailto:info@Clicktools.com). We reserve the right to change this Statement and will provide notification of the change at least thirty (30) business days prior to the change taking effect.

### Collected Information

We require customers who register to use the services ("Services") offered on our web site ("Site") to give us information, including but not limited to name, company name and e-mail address, and billing information, such as billing name and address, and the number and details of users that will be using the Services. At the time you express interest in attaining additional information, or when you register for the service, we may also ask for additional personal information, including but not limited to title, department name, fax number, or additional company information, such as annual revenues, number of employees, or industry. Customers can opt out of providing this additional information by not entering it when asked.

Clicktools uses the information collected to set up Services for individuals and their organisations. Customers are required to provide an email address when registering for the Service, in order to receive a username and password. We may also use the information to contact customers to further discuss the Services that we provide, and to send information regarding our company or partners, such as promotions and events. Customers are invited to receive an email newsletter by providing an email address. Customer email addresses will not be sold, distributed or shared. We may also email information regarding updates to the Service or company, and will send a Customer Newsletter. Customers can opt out of receiving any communication by emailing [info@clicktools.com](mailto:info@clicktools.com) at the time. Except as we explicitly state at the time we request information we do not disclose that information to any third-party (unless we are obliged to do so by law). All billing information that we collect is used solely to bill for Services. This billing information is not used by Clicktools for marketing or promotional purposes.

Any information which is provided by you will be treated in accordance with the terms of the Data Protection Act, 1998, and any implementing and/or amending legislation as may be adopted in the UK from time to time.

Clicktools also 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. Clicktools 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 Clicktools' certification, please visit <http://www.export.gov/safeharbor/>.

Clicktools customers use the Site to host data and information ("Data"). Clicktools will not review, share, distribute, print, or reference any such Data except as provided in the Clicktools Subscriber Agreement, or as may be required by law. Individual records may at times be viewed or accessed only for the purpose of resolving a problem, support issue, or suspected violation of the Subscriber Agreement. Customers are responsible for maintaining the confidentiality and security of their user registration and password.

Clicktools may also collect certain information from visitors to and customers of the Site, such as Internet addresses. This information is logged to help diagnose technical problems, and to administer our Site in order to constantly improve the quality of the Service. We may also track and analyse non-identifying and aggregate usage statistics information from our visitors and customers and provide such information to third parties.

### **Cookies**

Users of the Service and visitors to the Clicktools web site will not be required to store cookies. Clicktools uses session cookies only. Session cookies exist only for the duration of that online session. They disappear from your computer when you close your browser software or turn off your computer.

Clicktools uses session cookies containing encrypted or encoded information including your username and session ID. This information allows Clicktools to process your online transactions and requests. Session cookies help us make sure you are who you say you are after you've logged in and are required in order to use the Clicktools application. We are especially careful about the security and confidentiality of the information stored in cookies. For example, we do not store account numbers or passwords in cookies. Users who disable their Web browsers' ability to accept cookies will be able to browse our Website but will not be able to successfully use our service.

### **Third-Party Sites**

The Site contains links to other web sites. Clicktools is not responsible for the privacy practices or the content of these other web sites. Customers and visitors will need to check the policy statement of these others web sites to understand their policies. Customers and visitors who access a linked site may be disclosing their private information. It is the responsibility of the user to keep such information private and confidential.

### **Opt-In/Out Policy**

Clicktools offers its visitors and customers a means to choose how we may use information provided. If, at any time after registering for information or ordering Services, you change your mind about receiving information from us or about sharing your information with third parties, send us a request specifying your new choice. Simply send your request to [info@Clicktools.com](mailto:info@Clicktools.com) with the word 'Unsubscribe' in the Subject.

### **Correcting & Updating Your Information**

If Clicktools customers need to update or change registration information they may do so by editing their own 'Account' details accessible after logging in to the Clicktools service. To update billing information please email your account representative.

### **Additional Information**

Questions regarding this Statement or the practices of this Site should be directed to Clicktools' Security Administrator by e-mail to [info@clicktools.com](mailto:info@clicktools.com).

Clicktools regularly reviews how we are meeting these privacy policies, including Safe Harbor and if a complaint cannot be resolved through our internal process, we agree to dispute resolution using the UK Information Commissioner's Office ([www.ico.gov.uk](http://www.ico.gov.uk)).

## **SECURITY STATEMENT**

Clicktools implements some of the most advanced technology for Internet security available. Secure Socket Layer (SSL) technology protects your information using both server authentication and data encryption, ensuring that your data is safe, secure, and available only to registered users in your organisation. Your data is completely inaccessible to your competitors.

Clicktools provides each user in your organisation with a unique user name and password that must be entered each time a user logs on. Clicktools issues a session "cookie" only to record encrypted authentication information for the duration of a specific session. The session "cookie" does not include

either the username or password of the user. Clicktools does not use "cookies" to store other confidential user and session information, but instead implements more advanced security methods based on dynamic data and encoded session IDs. Clicktools is hosted in a physically secure server environment that uses a firewall and other advanced technology to prevent interference or access from outside intruders.