

## Clarity Consulting, Inc. Website Privacy Policy

This privacy policy (hereafter "Privacy Policy") applies to ClarityCon.com (hereinafter, "Us", "We", or "ClarityCon.com"), and any other Website that Clarity Consulting, Inc. may make generally available to the public (collectively, the "Website(s)"). We respect the privacy of those individuals who may visit or access our Website(s) (in each case, such visitors are referred to as "You" or "Your" in this policy), and We are committed to protecting personally identifiable information that may be accessible through the Website(s). We have adopted this Privacy Policy to explain what information may be collected on our Website(s), how We may use this information, and under what circumstances We may disclose the information to third parties.

This Privacy Policy applies only to information We collect through the Website(s), and does not apply to our collection of information from any other sources, including but not limited to any software applications that We license, and/or any support or custom software development services We may provide. We keep this Privacy Policy posted on the Website(s) and you should review it frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy.

**WHEN YOU ACCESS OUR WEBSITE(S), YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITE(S).**

### 1. Information We May Collect

Our Website(s) typically collect two kinds of information about You: (a) information that You provide which personally identifies You; and (b) general information relating to your use of the Website(s) that does not personally identify You, and that We automatically collect when You visit our Website(s).

- A. Personally Identifiable Information: For the purposes of this Privacy Policy, Our definition of personally identifiable information includes any information that may be used to specifically identify or contact you, such as your name, address, e-mail address, phone number, etc. As a general policy, We do not require users to provide Us with any Personally Identifiable Information in order to use the Website(s).
- B. Non-Personal Information: Our definition of non-personal information includes any information that does not personally identify You. Non-personal information can include certain personally identifiable information that has been de-identified; that is, information that has been rendered anonymous. We obtain non-personal information about you from information that you may provide to us (e.g. by submitting a contact request, etc.), either separately or together with your personally identifiable information. We also automatically collect certain non-personal information from you when you access our Websites. This information can include, among other things, IP addresses, the type of browser you are using (e.g., Internet Explorer, Firefox, Safari, etc.), the third party Website from which your visit originated, the operating system you are using (e.g., Vista, Windows XP, Macintosh OS, etc.), the domain name of your Internet service

provider (e.g., America Online, NetZero, etc.), the specific areas of the Website that you visit, and the duration of your visit

## 2. How We Use & Share the Information Collected

- A. Personally Identifiable Information: As noted above, We do not require any Personally Identifiable Information to access or use the Website(s). If You do provide Us with such information (E.g. by submitting a contact request) We may also use this information to later contact you for a variety of reasons, such as customer service, providing you promotional information about our products and services or those of our other affiliated companies ("affiliated companies"), or to communicate with you about the services We have provided. In certain instances We may also share your personally identifiable information with our third party vendors performing functions on our behalf (or on behalf of our affiliated companies), e.g., vendors that provide us marketing or promotional assistance, analyze our data, assist us with customer service, etc. Our vendors agree to use this information, and We share information with them, only to carry out our requests. Except as provided in this Privacy Policy, your personally identifiable information will not be shared or sold to any third parties without your prior approval.
- B. Non-Personal Information: We use non-personal information in a variety of ways, including to help analyze site traffic, understand customer needs and trends, carry out targeted promotional activities, and to improve our services. We may use your non-personal information by itself or aggregate it with information We have obtained from others. We may share your non-personal information with our affiliated companies and third parties to achieve these objectives and others, but remember that aggregate information is anonymous information that does not personally identify You.
- C. IP Addresses: An IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet. When visitors request pages from our Website(s), our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others, and to track the use of our Website(s). IP addresses are considered non-personal information and may also be shared as provided above. We reserve the right to use IP addresses and any personally identifiable information to identify a visitor when We feel it is necessary to enforce compliance with our Website(s) rules or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website(s), or other users; or (d) in an emergency to protect the health and safety of our Website(s)' users or the general public.
- D. Cookies: "Cookies" are small text files from a Website that are stored on your hard drive. Cookies themselves do not typically contain any personally identifiable information. We may, from time to time, use cookies in connection with our Website(s); and We may analyze the information derived from these cookies for the same purposes as set forth in Section 2.C of this Policy. If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our Website(s) may not

function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

- E. Flash Cookies (LSOs): From time to time We may use local shared objects on our Website(s), also known as Flash cookies, to store your preferences such as volume control, or to display content based upon what you view on our site to personalize your visit. Flash cookies are different from browser cookies because of the type and manner in which data is stored. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage privacy and storage settings for Flash cookies, go to:

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

- F. Email Communications: If You send Us an email with questions or comments, We may use your personally identifiable information to respond to your questions or comments, and We may save your questions or comments for future reference. For security reasons, We do not recommend that you send non-public personal information, such as passwords, social security numbers, or bank account information, to us by email. However, aside from our reply to such an email, it is not our standard practice to send you email unless you request a particular service or sign up for a feature that involves email communications, We are sending you information about our services, or you consented to being contacted by email for a particular purpose.
- G. Transfer of Assets: As We continue to develop our business, We may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the personally identifiable information and non-personal information We have about You will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.
- H. Children, Parental Consent, and Privacy: The Children's Online Privacy Protection Act took effect on April 21, 2000, and imposes certain requirements on Web sites directed toward children under the age of 13 that collect information on those children, or on Web sites that know they are collecting Personally Identifiable Information on children under the age of 13. Our Website(s) are not directed toward children under age 13. We do not knowingly collect information from anyone under age 13. If We find out that We have collected information from a child under age 13, We will delete that information immediately.
- I. Other: Notwithstanding anything herein to the contrary, We reserve the right to disclose any personally identifiable information or non-personal information about You if We are required to do so by law, with respect to copyright or other intellectual property infringement claims, or if We believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website(s), or other users; or (d) in an emergency to protect the health and safety of our Website's users or the general public.

### **3. Keeping Your Information Secure**

We have implemented security measures We consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while We strive to protect your personally identifiable information and privacy, We cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information.

#### **4. Other Sites**

Our Website may link to or contain links to other third party Websites that We do not control or maintain. We are not responsible for the privacy practices employed by any third party Website. We encourage you to read the privacy statements of all third party Websites before submitting any personally identifiable information.

#### **5. Contact Information**

You may contact Us as provided below if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any personally identifiable information you have provided; or (c) if you have voluntarily submitted your contact information to Us, and you want to opt-out from receiving future promotional correspondence, including emails, from us or our affiliated companies;

<http://www.claritycon.com/contact/>

We will respond to Your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that We may not be able to fulfill certain requests while allowing you access to certain benefits, features and services offered on or through our Website(s).