

# T|Factor Privacy Policy

T|Factor is committed to protecting your privacy and earning your trust. This policy discloses our privacy practices for personal information you provide to us. This policy explains how we collect, use and safeguard your personal information. It is our intent to give you as much control as reasonably practicable over your privacy and personal information and the use we make of it in our business. We may, in our sole discretion, change this policy from time to time by posting a revised version on our web site (“T|Factor Site”) or otherwise publicly disseminating it, so please check back from time to time.

## **What kinds of personal information does T|Factor collect?**

In general, you can visit T|Factor on the Web without telling us who you are or revealing any personal information about yourself. The more information you volunteer (and the more accurate it is), the better we are able to customize your experience. We ask for information from you in several ways from different parts of the T|Factor Site and also as part of providing our products and services.

- We ask for personal information when you become a registered user of the T|Factor Site, purchase our products or services, or register for a conference or event. For example, such information might include your name, address, telephone number, email address, and other information related to you or your business. You are required to register and receive a logon name to be able to access and use certain features of the T|Factor Site. We also request certain other optional information that will enable us to provide you with a more personalized experience when using the T|Factor Site. We will let you know what information is optional, and you can decide whether or not you want to provide that information or to receive newsletters or third party correspondence.
- We ask for personal information from you during the course of discussing or providing our products and services.
- If you choose to use our hosting service, you may choose to store personal information into the software or service that resides on our servers. We do not control the collection or storage of personal information during this process, but rather provide you the means to store or remove such information on the system as part of these services.
- If you choose to license the KnowledgePortal360 service, we may collect information relating to your employees as necessary to perform the service for you. Such information might include, without limitation, employee and supervisor names, email addresses, performance ratings, salary and pay information, and other employee demographic information to verify employee identity and authenticity to enable the employee to access the system, generate reports, or provide requested KnowledgePortal360 services.

- In the course of using our site, we automatically track certain information about you. This information includes what type of browser you are using, as well as the URL that you just came from and the next URL you go to, regardless of whether these URLs are on our Web site or not. It also includes your IP address. T|Factor uses this information to, among other things, identify broad demographic trends that may be used to provide information tailored to your interests.
- We ask for personal information when you enter a contest, sweepstakes or other promotion sponsored by T|Factor or its partners.
- We also monitor customer traffic patterns and site usage to help us refine and improve the design and layout of our T|Factor Site and the user experience.
- If you send us personal correspondence, such as e-mails or letters, we may keep a record of that correspondence. We also periodically ask users for feedback that we use to improve our service and products and add new features. If you respond to these requests, we may keep a record of your response.
- We also collect IP addresses for system administration.

### **How does T|Factor use my information?**

We collect personal information to give you a customized experience and to help T|Factor understand its customers and prospective customers better. T|Factor does not currently sell, trade, or rent your personal information to others.

- We use the personal information as necessary to provide you with our services.
- We do not access or use the personal information you store on our servers through our hosting services, except to provide such services, to provide support in connection with such services, to test, troubleshoot and improve our products and services, or as otherwise authorized or requested by you.
- We use the personal information you give us to provide you with up-to-date information about T|Factor products and services.
- We may use your personal information to conduct surveys and research to improve our products and services.
- We may use the information we collect to notify you from time to time about important functionality changes to the Web site, new T|Factor services and products, and special offers we think you may find valuable.
- We will deliver targeted advertisements to our customers using the personal information you give us and that we collect. Third parties provide us with advertisements and identify an audience they want to reach. We display these advertisements on our Web site to people who fit the criteria. We do not allow

advertisers to have access to individual account information. These advertisements are usually banner ads and promotional e-mails.

- We also research our users' demographics, interests, and behavior based on the information you give us and the information we collect.
- We compile and analyze personal information on an aggregate or anonymous basis to model industry trends, do market analysis, and to publish industry research papers identifying trends in the marketplace. Such industry research papers contain aggregate and anonymous data only, and do not contain any personal information that can be used to identify you.
- We use the IP addresses we collect to report aggregate or anonymous information to our advertisers.

You can unsubscribe from receiving any advertisements or newsletters by sending an email with "REMOVE" in the subject line to: [privacy@tfactor.com](mailto:privacy@tfactor.com).

### **Who collects information?**

When you supply personal information to T|Factor or on a T|Factor Site, you share that information only with T|Factor unless you are specifically informed otherwise. If a company other than T|Factor is gathering or maintaining your personal data from the T|Factor Site, you will be told before it is collected or transferred. You can always choose not to share the information.

When companies other than T|Factor sponsor promotions, data collected on the T|Factor Site in connection with these promotions may be shared with the sponsor. Once again, if this is the case, you will be notified before the data is collected or transferred, and you can decide not to participate.

If you leave the T|Factor Site using links to go to other third party Web sites, those third parties may gather information about you. This privacy policy does not cover the practices of those businesses.

### **Does T|Factor share my information?**

Other than as stated in this policy, T|Factor does not disclose any of your personal information to third parties without your permission. Read the following sections to learn more.

- **Business partners, subcontractors and sponsors**  
T|Factor may disclose your personal information to business partners, subcontractors or sponsors as T|Factor deems necessary to provide products and

services to you. Many promotions give you the chance to request additional information from the sponsors. When you ask for more information, you give T|Factor permission to send your personal information to the sponsor so they can fulfill your request. If you do not want any personal information to be shared with our business partners or sponsors, you may opt out by sending an email to [privacy@tfactor.com](mailto:privacy@tfactor.com) with "OPT OUT" in the subject line.

- **T|Factor International Locations**

T|Factor maintains offices in many areas around the world. To better serve you, the information you provide may be accessed by T|Factor employees worldwide.

- **Third-party data and aggregate data**

T|Factor discloses aggregated or anonymous statistics (for example, the percentage of users from the western U.S.) to prospective partners and advertisers and for other lawful purposes.

- **Other situations**

T|Factor also may disclose your information where disclosure is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interfering with our rights or property rights, the users' rights, or others' rights. In the same way, T|Factor will disclose information when we reasonably believe disclosure is required by law or to comply with a legal process served on T|Factor Systems. We may also disclose your personal information in the good faith belief that we must act under exigent circumstances to protect the personal safety of users of the T|Factor Site, or the public.

### **Do I have a choice about how my information is gathered, used and distributed?**

Yes. When you log in or register with T|Factor, you can choose to receive newsletters, information, and e-mails from T|Factor and third parties. If you change your mind, you can simply update your account information on our Web site so that the information will not be sent. It's your choice.

Some of our promotions may request your e-mail address so that you can receive periodic updates about the status of the promotion. When you participate in these types of promotions, you will automatically receive promotion-related e-mail; however, you can choose the no-e-mail option that some promotions offer. Occasionally these promotion-related e-mail messages may include targeted advertisements.

While using our hosting services, you may choose to store personal information on our servers through such services. The storage and removal of such information is at your discretion.

### **What security precautions does T|Factor take to protect me?**

We have security measures in place to protect your personal information, including the use of industry-standard encryption technology and internal policies and restrictions regarding the storage of and access to your personal information.

Your T|Factor account information and profile are password-protected so that you are the only one who has access to your personal information. You can edit your account information and profile by using your logon name and password. We recommend that you follow these guidelines to protect yourself:

- Do not tell anyone your password. If your password has been compromised for any reason, you should immediately change your password.
- Do not respond to unsolicited e-mail by giving your password, even if the e-mail claims to be from us. T|Factor will never ask you for your password in this way.
- When you are done using the T|Factor site, sign out of your account and close your browser window.

No data transmission over the Internet can be guaranteed to be 100% secure. Although we are committed to protecting your personal information, T|Factor cannot ensure or warrant the security of any information you send to us or from our online services. Providing personal information to T|Factor is done at your own risk.

### **What are cookies and how does T|Factor use them?**

Part of our customized service involves using “cookies” so that we can immediately recognize you, determine when you – or someone using the same browser you previously used – revisits T|Factor, and to provide a more personalized experience. A "cookie" is a chunk of data that is sent to your browser from a web server and stored by your browser on the hard drive of your computer. Your browser settings must be set to accept cookies before you can login or customize. Most browsers are set up to accept cookies, but you can usually change your browser settings to refuse them. T|Factor does not use cookies to retrieve personal information about you from your computer. This policy does not cover the use of cookies by any advertisers on the T|Factor Site.

T|Factor uses cookies to:

- Locate your name and account information when you log in to our Web site so that you can access your account information. When you log in, the cookie is set, and when you sign-out, the cookie is modified.
- Estimate the size of our audience. Each browser that accesses T|Factor is given a unique cookie, which is used to calculate how many people return to our Web site, compare the number of registered and unregistered visitors to our site, and use customer interests and behavior to target our advertisements.

- Help T|Factor partners track visits and complete business transactions. This information is sometimes called "clickstream" or "click trail".
- Track the way you use our promotions, contests, and sales. When a T|Factor Systems-hosted promotion uses cookies, the information written to the cookie tracks the user's progress through the promotion (for example, entries, submissions, and status in prize drawings).
- Measure the traffic to various areas of the T|Factor Site. We measure the areas of the network of Web sites you visit and your visiting patterns in the aggregate. This research helps us understand the ways in which our customers are alike and the ways in which they differ. We may use this information to personalize the information and design in our Web site.

You can make decisions about cookies. You can modify your browser preferences to accept all cookies, be notified when a cookie is set, or to reject all cookies. If you decide to reject all cookies, you might not be able to access certain areas of the T|Factor website or participate in T|Factor services that require registration to participate.

### **What about the privacy of children?**

T|Factor is a general audience Web site and does not request the age of its customers. T|Factor does not knowingly collect any personal information from children.

### **Safe Harbor**

T|Factor adheres to the EU's Safe Harbor principles.

### **Contacting Us**

If you have any questions regarding this Privacy Policy or wish to access or correct your personal information that we collect, please contact us at [privacy@tfactor.com](mailto:privacy@tfactor.com).