

## **Advanced Insights**

# PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THIS WEBSITE

We consistently strive to develop new and innovative products and services as part of our commitment to better serve our customers. We recognize that privacy is an important issue, so we operate ourselves in a manner consistent with the protection of your privacy. We developed this Privacy Policy pursuant to applicable law regarding the collection and use of Personally Identifying Information (defined below) in those jurisdictions where we do business. This Privacy Policy outlines the types of Personally Identifying Information, as well as some of the steps we take to safeguard it. We urge you to read the Privacy Policy in its entirety and hope it will help you make an informed decision about sharing your Personally Identifying Information with us.

This privacy policy is effective as of December 3, 2008. Assess Central reserves the right to change this policy at any time. Please check this page periodically for changes. Your continued use of Assess Centrals' services following the posting of changes to these terms will mean you accept these changes. Assess Central will take reasonable measures to notify you if there is a material change in our privacy practices with respect to use of the information you have provided to Assess Central. Assess Central will occur on the Assess Central website at least 30 days prior to any material change. If you have any questions about this privacy statement, the Assess Central practices, or feel that your privacy has been compromised, please contact us at <u>sharon@assesscentral.com</u>.

Your privacy on the Internet is important to Assess Central. As part of the operation of Assess Central, certain pieces of information are gathered about the users registering to gain access to the site (individually, a "Registrant" and collectively, "Registrants"). This privacy policy contains explanations regarding the types of information collected, what is done with such information, and how to correct or change the information.

By registering on the site, you are agreeing to receive targeted marketing via email from Assess Central and its affiliates and you consent to Assess Central employing its information collecting techniques in its continuing efforts to better serve you. If, after you have registered and consented to this privacy policy, you no longer wish to receive such marketing emails or do not consent to its information collecting techniques, please see the "opt-out" section below. Except as set forth in the "Limits of Confidentiality" section below, we do not use information about users for any purposes unrelated to the services offered by Assess Central.

## **GENERAL PRIVACY PRINCIPLES**

## Accountability:

Assess Central is responsible for your Personally Identifying Information under its control. Assess Central has appointed an officer who is accountable for Assess Centrals' compliance with this privacy policy. Sharon Nigro has been designated Assess Centrals' privacy officer in connection with this privacy policy.

Sharon Nigro can be reached by telephone at 216.227.6272, by email at <u>sharon@assesscentral.com</u> or by regular mail at 12061 Lake Ave., Lakewood, OH 44107.

# **Identifying Purposes:**

"Personally Identifying Information" is information that individually identifies you, such as your name, company name, physical address, phone numbers, email address and any other information that would allow someone to identify or contact you. Assess Central asks for your Personally Identifying Information so that it can understand your needs, determine if Assess Centrals' products and services meet your needs, inform you about its products and services that it believes may be of interest to you, or comply with the law. Of course, you may choose not to provide Assess Central with Personally Identifying Information. However, this choice may prevent Assess Central from providing you with the product, service or information you requested or that could be offered to you. Our server does not automatically record Personally Identifying Information. Such information can become known to Assess Central via its websites only when you voluntarily submit it.

# Consent:

Your knowledge and consent are required for the collection, use, or disclosure of your Personally Identifying Information. No information is collected without your express consent.

## Limiting Collection:

Assess Central only collects the information that it needs in order to deliver products, services and information to you.

## Limiting Use, Disclosure and Retention:

Assess Central does not use or disclose your Personally Identifying Information for purposes other than those for which it was collected or as set forth in this privacy policy, except as otherwise set forth in this privacy policy under the heading Limits of Confidentiality, or as required by law. Your Personally Identifying Information is retained only as long as necessary for the fulfillment of those purposes or as required by law.

## Accuracy:

Your Personally Identifying Information is kept as accurately and completely as is necessary for the purposes for which it is to be used. You have the right to update, modify, amend or correct errors in your Personally Identifying Information by contacting Assess Central.

## Safeguards:

Assess Central protects your Personally Identifying Information by using safeguards that are appropriate to the sensitivity of the information. Each of our employees who have access to your Personally Identifying Information is informed about our Privacy Policy and procedures for protecting Personally Identifying Information.

Assess Central undertakes substantial efforts to protect the confidentiality of the identity, preferences and other information it has collected about individual Registrants and, except as otherwise set forth in this Privacy Policy, will not knowingly allow access to this information to anyone outside Assess Central as described below under the heading Limits of Confidentiality. Assess Central has made a substantial investment in its server, database, backup and firewall technologies to protect our information assets,

including the confidentiality of information collected about Registrants. These technologies are deployed as part of a sophisticated security architecture and protocol.

You should also do your part in protecting your information. Your user name and password are confidential and we recommend that you not divulge them to anyone. Unfortunately, neither Assess Central's network nor data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect Registrant's information, Assess Central cannot ensure or warrant the security of member information. Thus, any information a Registrant transmits to us is done so at the Registrant's own risk. Once we receive Registrant information, we undertake substantial efforts to protect the confidentiality of this information consistent with this Policy.

# **Openness:**

Assess Central will make its complete policies and practices relating to the management of your Personally Identifying Information readily available to you.

# Access:

Upon request in writing, either by email or letter, you will be informed of the existence, use or disclosure of your Personally Identifying Information and you will be given access to that information. Assess Central will assist any customer who informs us that they need assistance in preparing a request concerning Personally Identifying Information. You may also challenge, in writing either by email or letter, the accuracy and completeness of the information and have it amended as appropriate, or request that Assess Central delete or correct any Personally Identifying Information contained in your file.

## **Challenging Compliance:**

You may address any challenge concerning our compliance with this privacy policy to Sharon Nigro at <u>sharon@assesscentral.com</u>, or by regular mail at 12061 Lake Ave., Lakewood, OH 44107.

# SPECIFIC PRIVACY POLICY

## Scope:

Our privacy policy applies to all websites owned and operated by Assess Central and to any Personally Identifying Information collected by Assess Central. It is designed to inform you of when, why, how and for what purpose Assess Central collects Personally Identifying Information from visitors to its websites. It is also designed to inform you about the types of information that is collected about you at Assess Central's website. Finally, it is designed to inform you about our use of Personally Identifying Information collected at Assess Central websites and to whom access to such Personally Identifying Information may be given. Our privacy policy is also designed to inform you about how you may access, amend, or delete Personally Identifying Information collected by Assess Central and how you may limit Assess Central's use of your Personally Identifying Information.

On occasion, Assess Centrals' websites are connected by "hyperlinks" to other companies' websites. Please note that Assess Central is not responsible in any way for the privacy practices of other websites and suggests that you review the privacy policies of those other companies' websites before using them.

# What types of Personally Identifying Information does Assess Central collect?

#### On each visit to Assess Central's website:

Assess Central collects certain limited non-personally identifying information your browser makes available whenever you visit a website. This log information includes your Internet Protocol address, browser type, browser language, as well as the date and time of your visit. We use this information to operate, develop, and improve our website. This information does not include your Personally Identifying Information. Our server does not automatically record Personally Identifying Information. Such information can become known to Assess Central via its websites only when you voluntarily submit it. No information is collected without your express consent.

## Contact Us Form:

When you use the email form on Assess Central's website, we collect Personally Identifying Information from you and offer you an area to enter comments or questions.

#### Login Access:

If you are a registered user, you may login to the Assess Central website using the user name and password that were provided to you. Logging-in to the site will identify you as a unique user and is necessary to insure that your account details are properly displayed.

#### How does Assess Central use your Personally Identifying Information?

## **Confidentiality:**

Except as set forth under the "Limits of Confidentiality" section below, or otherwise in this Privacy Policy, Assess Central will not provide Personally Identifying Information about a Registrant to third parties. By making a purchase, requesting additional information, or communicating directly with the company or organization after visiting its website, a Registrant is choosing to provide Assess Central with Personally Identifying Information in such Registrant's sole discretion.

#### How we protect your information:

Assess Central may store and process Personally Identifying Information collected on our site on our own servers or on the servers of our Business Partners (defined below). Paper copies containing all or part of the Personally Identifying Information you supply to us may be made and kept in file cabinets as part of the course of normal business activity. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. The Personally Identifying Information that you provide to us, specifically your credit card information is maintained on secure servers and protected by industry-standard Secure Socket Layer encryption. When entering personal information, look for the Secure Site icon on the lower right-hand side of your browser window that indicates you are on a secure page. We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access to your Personally Identifying Information to employees who need to know that information in order to perform their jobs and provide service to you.

## Limits of Confidentiality:

If you choose to share your Personally Identifying Information with us we may use it for the purposes of sending you requested information as well as occasional offers, announcement, bulletins and other

similar purposes. We also will not give, rent, loan, or otherwise make available your Personally Identifying Information to third parties except in the limited circumstances described in this "Limits of Confidentiality" section, or with your consent.

# We may share such information in any of the following limited circumstances:

(i) Marketing. As part of its day-to-day business activities, Assess Central may share with third parties certain non-personally identifying log information your browser makes available whenever you visit our website.

(ii) Transactions with Assess Central. We may provide your Personally Identifying Information and credit card information to trusted businesses or persons ("Business Partners") for the sole purpose of processing or storing personally identifying information on our behalf. These Business Partners include website developers, internet service providers, banks and credit card processing companies, as well as other third parties we use to assist us in our mission of proving you with Assess Central products and services. When we do disclose your information to others, it is subject to agreements that require those parties to process such information only on our instructions, in compliance with this Privacy Policy, and in an appropriate confidential and secure manner.

(iii) Security. Due to the existing legal, regulatory and security environment, Assess Central may disclose aggregate level and/or Personally Identifying Information about its Registrants to protect the rights, property or safety of Assess Central, our customers, or the public.

(iv) Sale or Transfer of Business. We may sell or otherwise transfer such information to a successor of Assess Central, or any subsidiary or division of Assess Central in connection with an asset sale, acquisition, merger, consolidation, divestiture, stock sale, purchase of part or all of the assets of the business, or other corporate transaction, or by way of assignment (whether by operation of law or otherwise) in connection with any such or similar transaction or in connection with the administration of a bankruptcy estate. In the case of such event, the Personally Identifying Information will become the property of the successor and will be subject to the successor's Privacy Policy should they have one.

## What about cookies?

A "cookie" is a small file containing a string of characters that is sent to your browser from a web server and stored on your computer hard drive when you visit some websites. Our website does use cookies, but we do not keep any valuable information there. Our cookie contains the session number, which is a unique identifier assigned to the user after a successful login which is always unique. All users get a new identifier on each login.

# **Opting-out:**

Even after you have granted Assess Central your consent to collect Personally Identifying Information, you may opt-out of having your Personally Identifying Information collected by contacting us by email. Please note that in order to fulfill certain obligations, we may need to continue sending you notices or other important information concerning any orders or services you request. If you wish not to receive targeted marketing email from Assess Central and wish not to have their information shared with third parties as set forth in this policy, you may send an email message to <u>sharon@assesscentral.com</u> with a subject line of 'Remove from Assess Central' to terminate your registration. If you terminate your registration, you will no longer receive any communications from us.

# Accessing your Personally Identifying Information once given:

You have the right to request information about the existence, use and disclosure of your Personally Identifying Information and to challenge the accuracy and completeness of your Personally Identifying Information, and to have your Personally Identifying Information amended where inaccurate or deleted from Assess Central's database. To do so, simply email Assess Central at <u>sharon@assesscentral.com</u> or write to Assess Central at 12061 Lake Ave., Lakewood, OH 44107, attention: Sharon Nigro. On each email you receive from Assess Central, you will be given the opportunity to change, modify or delete information which you have previously provided to Assess Central and you will also be given the opportunity to unsubscribe, thereby removing your email address permanently from our mailing list.

# Changes to this Policy:

Please note this Privacy Policy is subject to change from time to time without specific notice. We expect most such changes to be minor, but there may be changes that are more significant. Regardless, we will post those changes on this page and, if the changes are significant, we will also provide a more prominent notice. Each version will be noted at the top of the page. Prior versions of this Privacy Policy will be kept in an archive for you to view for a reasonable period of time. There are no prior versions in the archive at this time.

## **Contact Information:**

If you have any additional questions about this privacy policy, feel that information we have collected about you is incorrect, or wish to opt-out of future emails, please feel free to contact us at any time.

ALL CONTENTS COPYRIGHT 2007-2012 
ADVANCED-INSIGHTS CONTACT INFORMATION: (216) 529-1190