



## **RGIS Privacy Policy**

**Last updated July 1, 2014**

RGIS, LLC and our affiliates in the United States of America (collectively, “RGIS,” “we,” “us,” or “our”) provide this Privacy Policy because we know that you care about how your information is collected, used, shared, and retained. This Privacy Policy applies to information collected when you visit [www.rgis.com](http://www.rgis.com), <https://exactcount.rgis.com/> and/or any other RGIS owned or controlled websites (the “Platforms”). This Privacy Policy also applies when you (i) create or access an account through any of the Platforms (an “Account”) or use the services, including any applications or demos that we make available via the Platforms, from time to time (the “Services”). The Platforms and Services are collectively referred to herein as the “RGIS Properties.” By visiting the Platforms, creating or accessing an Account, and/or using the Services, you are consenting to our collection, use, disclosure, and retention of your information as set forth in this Privacy Policy.

RGIS, LLC has received TRUSTe's Privacy Seal signifying that this privacy policy and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program covers only information that is collected through this websites, [www.rgis.com](http://www.rgis.com) and <https://exactcount.rgis.com/>.

If you have an unresolved privacy or data use concerns that we have not addressed satisfactorily, please contact TRUSTe [here](#).

This Privacy Policy does not apply to the privacy practices of our affiliates located outside of the United States. Rather, such practices are governed by our affiliates’ respective privacy policies.

### **Safe Harbor Certification**

In light of the international nature of our business, RGIS’ privacy practices are self-certified to the Safe Harbor Program agreed to by the US Department of Commerce and the European Commission. RGIS complies with the US-EU Safe Harbor Framework and the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. RGIS 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 our certification page, please visit <http://www.export.gov/safeharbor/>.

### **Important Notice to Non-U.S. Residents**

The RGIS Properties and their servers are all operated in the United States and elsewhere. If you are located outside of the United States, please be aware that any Personal Information or Other Information (each as defined below and collectively, the “Information”) you provide to us and/or that we collect from you will be transferred to, processed, and used in the United States in accordance with the terms set forth in this Privacy. By using the RGIS Properties and/or providing us with any Personal Information, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States.



## **The Information We Collect and/or Receive**

In the course of operating the RGIS Properties, RGIS will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

### 1. Personal Information

When you use the RGIS Properties, you may provide us with personally identifiable information about you, such as your name, e-mail address, postal address, and telephone number (collectively, the “Personal Information”). We do not collect any Personal Information from you when you use the RGIS Properties unless you provide it voluntarily (for example, by signing up for an Account, registering for a webinar, requesting a newsletter, or sending us a message).

### 2. Other Information

In addition to the Personal Information, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

a. From You. Additional information about yourself that you voluntarily provide to us, such as your communication preferences (e.g., receiving SMS messages, e-mails, or phone calls), personal interests, product and service preferences, and other information that does not identify you personally.

b. From Your Activity. Information that we automatically collect when you use the RGIS Properties, including, without limitation:

- When you visit the RGIS Properties, we may collect your IP address (which may consist of a static or dynamic IP-address and will sometimes point to a specific identifiable computer), browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, sections of the RGIS Properties visited, etc.
- When you use the RGIS Properties, we may collect information regarding your activity occurring via the RGIS Properties, including usage statistics (e.g., number and timing of uses, performance statistics, etc.) As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing analytics, or site functionality.

c. From Cookies. Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer so that it will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the RGIS Properties. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the RGIS Properties may not function properly.

Technologies such as: cookies, beacons, tags and scripts are used by RGIS, LLC and our partners (e.g. marketing partners), affiliates, or analytics or service providers (e.g. online customer support providers, etc.). These technologies are used in analyzing trends, administering the site, tracking users’ movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.



## **The Information Collected by or Through Third-Party Advertising Companies**

We may – and you authorize us to – share Other Information about your activity while using the RGIS Properties with third parties for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see through the RGIS Properties and elsewhere. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. Pixel tags enable us, and these third-party advertisers, to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking <http://preferences-mgr.truste.com> (or if located in the European Union [click here](#)). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

## **Communication Preferences**

You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any RGIS marketing email. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases. However, you cannot opt out of receiving transactional e-mails related to your Account, such as emails about your use of the RGIS Properties.

## **How We Use and Share the Information**

You authorize us to use the Information to deliver correspondence, communications, or services, such as newsletters, events, training, that you request or purchase; process orders; provide and improve the RGIS Properties; solicit your feedback; inform you about our products and services and those of our third-party marketing partners; and administer our promotional programs. You also authorize us to use and share the Information as described below.

- In order to administer our promotional programs, we may share your Information with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs and only in the ways that are described in this privacy policy. We do not sell your personal information to third parties.
- We may, from time to time, share your Information with other companies who may provide you information about the products and services they offer. If you do not want us to share your personal information with these companies, contact us at [privacy@rgis.com](mailto:privacy@rgis.com).
- In an ongoing effort to better understand our users, customers, and the RGIS Properties, we might analyze the Other Information in aggregate and anonymized form in order to operate, maintain, manage, and improve the RGIS Properties. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, advertisers, and business partners. We may also disclose aggregated user statistics in order to describe our products, services, and the RGIS Properties to current and prospective business partners and to other third parties for other lawful purposes.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing network services, information technology support, and customer service. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.



- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets. You will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information,
- To the extent permitted by law, we may also disclose Information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or your safety, safety of RGIS or others or investigate fraud
- To any other third party with your prior consent to do so.

### **How We Protect Your Information**

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. If you have any questions about security on our Web site, you can contact us at [privacy@rgis.com](mailto:privacy@rgis.com).

### **User Access and Choice**

If your Personal Information changes, or if you no longer desire our service, you may correct, update, amend, delete/remove, ask to have it removed from a directory or testimonial on our site or deactivate it by making the change on our member information page or by emailing our Customer Support at [privacy@rgis.com](mailto:privacy@rgis.com) or by contacting us by telephone or postal mail at the contact information listed below. We will respond to your request to access within 30 days.

### **Data Retention**

We will retain and use your Information as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Children**

We do not knowingly collect Personal Information from children under the age of 13 through the RGIS Properties. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Information through the RGIS Properties without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information and terminate the child's account from our databases.

### **California Residents**

Under California Civil Code Section 1798.83, California residents who have an established business relationship with RGIS may choose to opt out of our sharing your Personal Information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your Personal Information to third parties for the direct marketing purposes, please send an e-mail to [privacy@rgis.com](mailto:privacy@rgis.com) or write to us at:



RGIS, LLC  
Attention: Office of General Counsel  
2000 E. Taylor Road  
Auburn Hills, Michigan 48326

In addition, RGIS does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

### **External Websites**

You may use the RGIS Properties to access third-party websites, and the RGIS Properties or the advertisements you receive through the RGIS Properties may contain links to third-party websites. RGIS has no control over the privacy practices or the content of any of the third-party websites that you may access using the RGIS Properties or the websites of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the RGIS Properties site prior to the change becoming effective. By accessing or using the RGIS Properties after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

### **Safe Harbor Complaints**

In compliance with the US-EU and US-Swiss Safe Harbor Principles, RGIS commits to resolve complaints about your privacy and our collection or use of your Personal Information. European Union or Swiss citizens with inquiries or complaints regarding this Privacy Policy should first contact RGIS via e-mail at [privacy@rgis.com](mailto:privacy@rgis.com) with “PRIVACY POLICY - SAFE HARBOR” in the subject line.

### **How to Contact Us**

If you have questions about this Privacy Policy, please e-mail us at [privacy@rgis.com](mailto:privacy@rgis.com).  
RGIS, LLC  
2000 E Taylor Road  
Auburn Hills, Michigan 48326  
(248) 651-2511