

# CIRCUIT ID<sup>TM</sup>

## **Privacy Policy**

*Privacy of our customers, private label resellers and affiliates v1.0*

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## What is the Purpose of this Privacy Policy?

Circuit ID™ created this Privacy Policy to demonstrate our firm commitment to the privacy of our customers, private label resellers and affiliates. This Privacy Policy sets forth our practices regarding the gathering and dissemination of Information (as defined below).

## How does Circuit ID™ define “Information” under this Policy?

In this Privacy Policy, “Information” means the following:

- information collected from you through access to or use of Circuit ID™’s websites; and
- if you are a current customer, private label reseller or affiliate of Circuit ID™,
  - your Data, if and as such term is defined in your Master Service Agreement, Private Label Reseller Agreement, Affiliate Agreement or other agreement with Circuit ID™ (the “Agreement”);
  - if your Agreement does not define the term “Data”, any information collected through your and your users’ access to or use of our platform or services (the “Services”), including as the term “Services” is defined in the Agreement.

If you have an Agreement with Circuit ID™, (i) any conflict or inconsistency between this Privacy Policy and Circuit ID™’s confidentiality obligations to you under the Agreement shall be resolved in favor of the Agreement and (ii) any reference to “you” in this Privacy Policy shall also refer to any individual or entity using Services under your account with Circuit ID™.

*By visiting our websites or using our Services, you accept and consent to the practices set forth in this Privacy Policy on behalf of you and your users.*

## What is the Scope of this Policy?

This Privacy Policy only covers Information collected by Circuit ID™. Circuit ID™’s websites may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Circuit ID™ does not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

## What are Circuit ID™’s Guidelines Regarding Children?

Circuit ID™ requires that all account holders be 18 years of age or older. In addition, our websites and Services are not designed for or directed to children under the age of 13, and Circuit ID™ will not knowingly collect or maintain Information about any person under the age of 13. If you believe Circuit ID™ has collected any Information from or about any person under 13, please contact us at [legal@circuitid.com](mailto:legal@circuitid.com).

## What about My Use of Circuit ID™ Forums?

Circuit ID™ may make chat rooms, forums, message boards, news groups and similar media, including social media, available to you. Please remember that any Information that is disclosed in these areas may become public and you should exercise caution when deciding to disclose any Information in any of these areas.

## What Kind of Information Does Circuit ID™ Collect?

Circuit ID™ may collect the following Information:

- personal and non-personal information that you voluntarily provide when using our websites or Services, including contact information (e.g., email address, name, telephone number, home or work address, and ZIP code) and billing information (e.g., credit card number, bank account number and billing address);
- standard information sent by your browser during visits to our websites or your use of our Services without identifying you as an individual, including IP address, your computer's operating system, language preference and browser type; and
- information about general usage of our website collected by using a cookie file which is typically stored on the hard drive of your computer. Please see the "How Does Circuit ID™ Use Cookies" section below for a further explanation.

## How Does Circuit ID™ Use Cookies?

When you access our websites or our Services, we may send one or more cookies to your computer. By sending you cookies with values that are unique, we may be able to uniquely identify your web browser or device when you access our websites or our Services. We may use both "session" and "persistent" cookies to collect, store, and sometimes track various types of information. A session cookie is one that is intended to disappear after you close your browser. A persistent cookie remains after you close your browser (and may be used by your browser to identify itself when you later return to our websites or Services). Persistent cookies generally can be removed. We use cookies to retain your session states and to offer you a personalized experience on our websites and Services. You can review the "Help" file in your browsers or mobile devices to learn the proper way to modify your cookie settings. Please be aware, however, that the use of cookies is necessary for the use of the administrative control panels and certain other aspects of our websites and Services.

## Interest-Based Advertising

When you visit one of our websites, advertising companies such as Google may place a cookie on your computer and may collect certain information about your use of our websites. These companies may use this information, as well as information they collect from your use of other websites, to display advertisements on the Internet about products and services they believe you may be interested in. You can learn more about this practice, and can learn about your choices with respect to the use of this information about you for customizing advertisements, at [www.aboutads.info/choices](http://www.aboutads.info/choices).

## How Does Circuit ID™ Use, Store and Retain Information?

Circuit ID™ may use, store and retain Information in the following ways:

- to provide you with information regarding the status of your account, to determine your tax status, and to bill you for our Services;
- to provide you with information and Services that you request from Circuit ID™ and to carry out Circuit ID™'s obligations arising from any agreement entered into between you and Circuit ID™, including the Agreement;
- to administer, test, analyze and improve Circuit ID™'s Services and to facilitate marketing, including providing you with information about available Services and related products and services;

- to gather broad demographic and statistical information, and other non-personally identifiable information, which Circuit ID™ may use for purposes such as understanding broad demographic trends and statistical information;
- to notify you about changes to the Services, welcome letters, billing reminders, technical notifications, security announcements; and
- for other purposes to which you may provide your consent.

If you are an existing customer, unless you ask Circuit ID™ to provide you with additional marketing information we will only contact you by electronic means (e-mail or by posting to your account with Circuit ID™). Circuit ID™ will not review, share, distribute, print, or reference any of your Information except as provided in the Terms of Service, or as may be permitted in this Policy or required by law.

We are committed to keeping Information no longer than necessary to achieve the purpose for which it was collected. However, some Information, including account and log information, may be retained indefinitely. Such Information shall continue to be subject to Circuit ID™'s Privacy Policy after any termination of your account with Circuit ID™.

### **How Does Circuit ID™ Access, Release and Disseminate Information?**

Except as described in this statement, we will not disclose your personal information outside of Circuit ID™ without your prior consent.

Circuit ID™ will release your Information as is reasonably necessary for the provision of Services.

This includes, but is not limited to:

- provision of billing information to organizations such as VeriSign, LinkPoint and similar organizations;
- provision of aggregated or otherwise non-personal Information to third parties, such as our provision of non-personal usage information to our service and license providers for the purpose of licensing compliance, licensing usage calculation, billing and support purposes;
- provision of Data to vendors and contractors providing services in support of Circuit ID™'s provision of Services to you. Circuit ID™ will only release data that is needed to deliver the service for which the third party vendor has been contracted. These vendors are required to maintain strict security and confidentiality of the information and are prohibited from using it for any other purposes other than in accordance with Circuit ID™'s instructions and policies.

In addition, Circuit ID™ may access and release your Information without notice or consent under the following circumstances:

- In response to subpoenas, warrants, government inquiries, court orders, or legal process, or to establish or exercise our rights to defend against legal claims, as determined by Circuit ID™ in each case;
- If we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, safety of person or property, violation of our policies, or as otherwise required by law (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction); and

- If Circuit ID™, any of its websites or Services or a related asset or line of business is acquired by, transferred to, or merged with another company.

### **What if I am Located within the European Economic Area or Switzerland?**

If you are located within the European Economic Area (“EEA”) or Switzerland, your Information may be transferred outside the EEA or Switzerland for processing. These countries may not have similar data protection laws to the EEA or Switzerland. If Circuit ID™ transfers your Information outside of the EEA or Switzerland in this way, it will take steps to ensure that your privacy rights continue to be protected. In addition, if you access our websites or Services while you are outside of the EEA or Switzerland, your Information may be transferred outside of the EEA or Switzerland in order to provide you with such access.

Circuit ID™ adheres to the European and Swiss Safe Harbor principles as set forth by the United States Department of Commerce regarding the collection, use, and retention of personally identifiable information collected from citizens of the European Union or Switzerland. Circuit ID™ has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. For more information and to view Circuit ID™’s certification, please visit <http://www.export.gov/safeharbor>. By submitting your personal information to us, you agree to this transfer, storing or processing.

For the purposes of the Data Protection Act of 1998, the data controller is Circuit ID, LLC, 42225 10<sup>th</sup> Street West, Suite 117, Lancaster, California 93536. Please see the “Questions Regarding this Privacy Policy” section below.

### **Is My Information Secure?**

Circuit ID™ takes reasonable steps in an effort to ensure that your Information is treated securely and in accordance with this Privacy Policy and requires its suppliers to do the same. Circuit ID™ has security measures in place to help protect against the loss, misuse, or alteration of the Information under Circuit ID™’s control. Your contact and financial information is submitted via a secure (HTTPS) connection and stored in the Circuit ID™ database protected by a firewall. Any payment transactions will be encrypted using SSL technology.

Although Circuit ID™ uses reasonable efforts to protect your Information, transmission via the Internet is not completely secure. Therefore Circuit ID™ cannot guarantee the security of your Information transmitted using our websites or Services and any transmission is at your own risk.

### **How Do I Terminate or Opt-Out?**

You have the right to request that Circuit ID™ not contact you or use your Information for purposes which are not reasonably necessary for the administration of our websites and/or the provision of Services. If you wish to exercise this opt-out right or to terminate your account, please contact Circuit ID, LLC 42225 10<sup>th</sup> Street West, Suite 117, Lancaster, California 93536. You may also send an e-mail to [legal@circuitid.com](mailto:legal@circuitid.com) or access any available termination or opt-out features in the administrative control panel for your Account.

Please note that you cannot unsubscribe from certain correspondence from us regarding our provision of Services to you, including messages relating to your account. In addition, certain Information may be required in order to use our websites or Services; as such, the only practicable method to opt out of providing Information in connection with the use of those websites or Services would be to refrain from subscribing to or using those websites or Services.

If you have any questions about this Privacy Policy, the privacy practices of our websites or Services, or your dealings with our websites or Services, please feel free to contact us.

You may also revise your contact and financial information or terminate your account through the administrative control panel for your Account.

## Questions Regarding this Privacy Policy

In compliance with the US-EU and US-Swiss Safe Harbor Principles, Circuit ID™ commits to resolve complaints about your privacy and our collection or use of your Information. European Union or Swiss citizens with inquiries or complaints regarding this privacy policy should first contact Circuit ID™ at:

Circuit ID, LLC  
Attn: Legal Department  
42225 10<sup>th</sup> Street West  
Suite 117  
Lancaster, California 93536

Circuit ID™ has further committed to refer unresolved privacy complaints under the US-EU and US-Swiss Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Circuit ID™, please visit the BBB EU SAFE HARBOR web site at <http://www.bbb.org/us/safe-harbor-complaints> for more information and to file a complaint.”

## How is this Privacy Policy Updated?

Circuit ID™ reserves the right to change this Privacy Policy at any time. Any changes to the Privacy Policy will be posted to at least one of our websites, including at <http://www.circuitid.com/legal/>.