

## ARKADIN PRIVACY POLICY

Arkadin® and our subsidiaries (collectively, "Arkadin", "we", "us") recognize and respect the importance of protecting your privacy. To that end, we have adopted the principles set forth in this privacy policy (the "Policy") to communicate our information gathering and dissemination practices.

Please read this Policy carefully. By using the Arkadin web site (the "Site"), you signify your assent to this Policy. If you do not agree to this Policy, please do not use the Site.

### Scope

This Policy is intended to inform you of the steps we take to protect the Personal Information (as defined below) that you choose to provide to us. We recommend that you carefully review this Policy before providing us with your Personal Information, because you are transmitting your Personal Information to us at your own risk.

This Policy applies to the Site, to all of the services offered by Arkadin through the Site (the "Arkadin Services") and to all personal information that we directly collect or otherwise receive from you, whether manually or digitally processed (the "Personal Information"). A Client (as defined below) may invite you to utilize this Site in order to participate in conferencing services initiated by them. This Policy does not apply to information our Clients collect or receive from you and we cannot guarantee or enforce the privacy policies of our Clients. If you are a visitor to the Site, this Policy applies to any Personal Information that we directly collect or otherwise receive from you. "Client" is defined as any person using the Arkadin Services, including but not limited to (i) the Client as signatory to the General Conditions for Service Provided, or (ii) any current or former person designated by the Client, such as any current or former employee, agent, subcontractor, or consultant of the Client, who leads, manages or attends a conference irrespective of whether such person has a relationship with the Client.

The Site, Arkadin Services and other products and services available herein are not developed for or directed at children. The Site is not designed to attract children under the age of thirteen. We do not knowingly solicit or collect Personal Information from any person that is under the age of eighteen. Visitors under eighteen years of age are not eligible to do business with us.

The Site may contain banner advertisements and hyperlinks that can take you to web sites run by third parties. Please be aware that we are not responsible for the privacy practices of other web sites even if we try to link only to sites that share our respect for privacy. For this reason, please review the privacy policies of these web sites before disclosing any personal information to or through them.

### Information Disclosure

The Personal Information that you submit to Arkadin remains your property. We do not share, sell or rent Personal Information to unrelated third parties and it will remain confidential other than allowing Arkadin the right to use that Personal Information: (a) for marketing and/or marketing survey purposes (and by submitting your e-mail address at the Site and/or registering for the Arkadin Services, you agree to receive e-mail marketing from

us unless and until you choose to opt-out); (b) in order to enable Arkadin to send you promotions about Arkadin Services; (c) for updates of any information that we may deem appropriate for you to receive in connection with your continued use of the Site; (d) to reach you, when necessary, regarding issues concerning your use of the Site and Arkadin Services; and (e) to provide you with information that you request and give you an interactive experience.

We may disclose Personal Information to third parties with whom we have contractual relationships in order to assist us in services such as invoicing and transmission of e-mail communications. If Arkadin discloses Personal Information to third parties acting as our agents, such third parties will be required to comply with our Privacy Policy.

We may also disclose Personal Information if required to do so by law or in the good faith belief that such action is necessary: (a) to the extent required by law (including our compliance with the United States Federal Communications Commission regulations; for example, pertaining to the confidentiality of "customer proprietary network information"); (b) to the extent required to respond to judicial process or a good faith belief that such action is necessary under law or to comply with legal process served on us; (c) to protect the security and integrity of the Site and Arkadin Services; (d) to protect our rights and property and the rights and property of others; (e) to take precautions against liability; (f) to respond to claims that submitted information violates the rights or interests of third parties; (g) to correct technical problems and malfunctions in how the Site operates or processes visitors' information; (h) in connection with a merger, consolidation or sale of all or substantially all of the stock or assets of one or more of our businesses; (i) to provide to our Clients pursuant to your request in furtherance of ensuring that you do not receive further communications from our Clients or from us; or (j) pursuant to our Clients' specific direction in connection with a service we are providing on behalf of our Clients.

## Security

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that Personal Information that we collect will never be disclosed in a manner that is inconsistent with this Policy. The Site is created and controlled by us and we periodically review our compliance to this Policy and our security practices to identify security threats or opportunities for improvement.

Arkadin may collect certain information from you such as Internet Protocol addresses and other data related to your use of the Site (the "Site Data"). This information is logged to help diagnose technical problems and to administer the Site in order to constantly improve the quality of the Arkadin Services. We may also track and analyze non-identifying and aggregate usage and volume statistical information from our Clients and other Site visitors and provide such information to third parties.

All Site Data and Personal Information that we collect are restricted in our offices. Only employees who need the Site Data and Personal Information to perform a specific job function are granted access to it. All such employees are contractually bound to adhere to our security protocols, which they must verify that they have read and understand. The practices for handling Site Data and Personal Information are disseminated to all of our employees. When we ask you to enter Personal Information, and when such information is stored and/or transmitted, that information is encrypted and is protected with SSL encryption software.

If you have any questions about the security related to the Site, please [Contact Us](#).

## Personal Information Collection

The Personal Information we request may include personally identifiable information such as your e-mail address, first name, last name, credit card number, a user-specified password, mailing address, zip code, mobile telephone number and home telephone number. It is solely your choice whether or not you provide the Personal Information. However, should you choose not to provide the Personal Information, we may be unable to process an order, fulfill a service or display certain content on the Site.

When you visit the Site, we send a cookie and/or "gif" file (a "cookie") to assign an anonymous, unique identifier to your Internet browser. Cookies are files that web browsers place on a computer's hard drive and are used to tell us whether visitors have visited the Site previously.

Stand-alone cookies do not identify a visitor personally. They merely recognize that visitor's browser. Unless a visitor chooses to identify itself to Arkadin by logging in, it remains anonymous to Arkadin. Cookies come in two types: "session" and "persistent-based". Session cookies exist only during an online session and disappear from the visitor's computer when the visitor closes its browser software or turns off its computer. Persistent cookies remain on a visitor's computer after it has closed its browser or turned off its computer. Persistent cookies include such information as a unique identifier for a browser.

Arkadin uses session cookies containing encrypted information to allow the system to uniquely identify you while you are using the Site. This information allows Arkadin to process your online transactions and requests. Session cookies help us make sure you are who you say you are after you log in and are required in order to use the Site. If you disable your web browser's ability to accept cookies, you will be able to browse the Site but will not be able to successfully use all of the Services. We treat any information that may be contained in cookies with the same level of protection as Personal Information you provide to us.

**To disable and reject certain cookies, click on the link for your browser: Internet Explorer, Mozilla Firefox, Opera.**

## Access to Personal Information

You are responsible for maintaining the confidentiality of your login name, password and/or pin code and for restricting access to your computer or account. You are responsible for (a) the use of your Personal Information or access to the account by any individual with whom you (i) share your login name, password and/or pin code, or (ii) authorize to use your account, and/or (b) any unauthorized use or access that results in whole or in part from your failure to protect the confidentiality of your login name, password and/or pin code.

Arkadin will assign to you confidential account access details such as an access number and a pin code. It is your responsibility to keep this information confidential pursuant to the Site's Terms of Use [add link here].

An individual seeking access to his or her Personal Information that we collected directly from that individual may contact us, as set forth below. An individual seeking access to his or her Personal Information that we received from a Client must contact the Client directly.

### **Opt Out/Unsubscribe**

To stop receiving future communications from Arkadin, please [Click Here](#). To opt-out of having your Personal Information shared with third-parties related to Arkadin, please [Click Here](#). Arkadin may maintain separate e-mail lists for different purposes: to end your e-mail subscription from a particular list, follow the instructions at the end of each e-mail message to unsubscribe from the particular list. To unsubscribe from all Arkadin e-mail lists, please [Click Here](#).

### **Modifications to Privacy Policy**

We reserve the right to make modifications to this Policy at any time. Any material changes to this Policy will be prominently posted online and accessible via this Site 30 days prior to taking effect. Your continued use of the Site will constitute an affirmative acknowledgement and acceptance by you of the terms of the prevailing Policy.

**If you have any questions about this Policy or the practices of Arkadin, please feel free to contact us at [contactus@Arkadin.com](mailto:contactus@Arkadin.com).**

*Last Revised February 2009.*