

Twin Dolphin Software (“**TDS**”) will take all reasonable steps to protect the confidentiality of the Personal Information you provide to us and the Transaction Information generated when you use the TDS web site, as described below. This Privacy Policy tells you:

1. What information we collect;
2. How we will use and share the information we collect;
3. The measures we take to protect the information we collect; and
4. How you can update or correct your information.

## 1. What Information We Collect

*Personal Information.* We collect only the information needed to set up access credentials, to provide accurate charges, and to improve the quality and usefulness of our Service. This information may include the user name, address, e-mail address, telephone number, and other personally identifiable information (“**Personal Information**”) that is collected as part of the registration process.

*Information Related to User ID.* We collect usage information by User ID for billing purposes. We maintain User log information only long enough to generate a valid invoice or charge for chargeable services.

*Transaction Information.* TDS may keep per-use records, such as API queries and number and type of reports generated, for billing, debugging, or system management. This information is kept for a maximum of three months. On request, TDS may be able to keep such user information in private files (“**Transaction Information**”).

*User Information.* All of the information we collect is referred to as “**User Information**”. For avoidance of doubt, User Information includes Personal Information and Transaction Information.

*IP Addresses.* As for 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 clickstream data. We use this information, which does not identify individual Users, to help us understand our Users’ needs and to improve our Services.

*Cookies.* We use “cookies” to enhance your experience when using our website or applications. You can see and control cookies through settings in your browser. However, refusing to accept cookies may limit your ability to access certain portions of the Service or the TDS web site.

*Communications for customer support.* We may keep records of e-mails and telephone calls for customer support purposes. We do this to make sure the problems and issues you bring to our attention are resolved promptly and correctly.

## 2. How We Use and Share the User Information We Collect

*Generally.* Our use of the Personal Information you provide us includes establishing and managing your access credentials, responding to your inquiries, providing the Services you request, managing your account, provide invoices to you, and informing you about changes, new services, etc.

*Choice.* A Subscribing Individual or a Subscribing Company who no longer wishes to receive our newsletter or promotional materials may revoke their opt-in by changing their preference on the User Settings, or by contacting Customer Service at customerservice@twindolphinsoftware.com, or by mail to Twin Dolphin Software, Attn: Customer Service, 303 Twin Dolphin Drive, Suite 600, Redwood City, CA 94065, USA.

*Sharing With Third Parties.* We do not make User Information or customer lists available to third parties, except in the situations described immediately below.

*Other Related Entities.* From time to time we may provide User Information to our subsidiaries and joint ventures in order to provide you the Service. Each of these entities will comply with this Privacy Policy. In addition, if the stock or assets of TDS, its subsidiaries, its joint ventures, or any combination of such, are acquired by another entity, some or all of your Personal Information may be provided to such successor. You may opt out of such sharing; please see “Choice” section above.

*Order Processing and Billing.* You may choose to pay for Services using a credit card. We pass the credit card information you provide us to a credit card processing company to complete the payment transaction. We do not keep any credit card information. We do not provide the credit card processing company any other Personal Information for any other purpose.

*Legal Requests.* TDS may disclose your User Information to law enforcement and such other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation or prosecution of alleged illegal activity. TDS also may disclose your User Information pursuant to a court order in a civil action or other lawsuit.

### **3. Security**

*Secure Sockets Layer.* We use Secure Sockets Layer (SSL) software for all transactions conducted on this web site, to protect the confidentiality of your User Information. SSL uses an encryption process to avoid unauthorized access or copying of information across the Internet. To learn more about SSL see <http://www.ssl.com>.

*Technical and Legal Limits.* Due to technological and legal limitations, TDS is unable to guarantee that your private communications and User Information will never be disclosed in ways not described in this Privacy Policy. For example, third parties (e.g. “hackers”) may unlawfully intercept or access transmissions or abuse or misuse information that they collect from the Service or the Site. Therefore, although we use industry-standard practices to protect your privacy, we do not promise or guarantee, and you should not expect, that your User Information or private communications always will remain private.

*Off-Line Protection.* We take all reasonable precautions to protect User Information off-line. Access to User Information is restricted to personnel who need the information to perform a specific job, e.g., billing, accounts receivable, or customer service.

*Other Sites.* This web site may link to other web sites. TDS does not have any liability or responsibility for the privacy practices of these third-party web sites. User is advised to read the privacy policy of each third-party web site to which a link is provided from this web site.

### **4. Accessing and Updating Your Information**

*Correcting, Updating, or Deleting Personal Information.* If your Personal Information changes, or if you wish to terminate access to the applications and or a subscription, if any, we provide a way to correct, update or remove each affected User’s Personal Information that has been provided to us. This can be done by contacting us as described in the paragraph “Choice”, in Section 2 above.

### **5. Notification of Changes to this Privacy Policy**

If we update this Privacy Policy you will be required to review and accept the new Privacy Policy before continuing to use the Service. If you do not agree with the new Privacy Policy you may choose to terminate access and to have all your personal information deleted. This can be done by contacting us as described in the paragraph “Choice”, in Section 2 above.

### **6. Other Information about Privacy**

*Minimum age.* You must be at least eighteen (18) years of age to register at this web site or to use the Service.

*Visitors from outside the United States:* Please note that if you register or use the Service, the information you enter may be transferred outside of your country. By registering or using the Service, you consent to this transfer and to the information usage described above. If you choose to access this web site or the Service from outside the United States of America, you take responsibility for compliance with applicable privacy laws of your country.