

CPaT GLOBAL PRIVACY STATEMENT

SCOPE

CPaT GLOBAL, LLC (“CPaT”) adopts and publishes this Privacy Statement effective May 25, 2018, which describes CPaT’s policies and procedures regarding our collection, use, disclosure, and protection of personal information, collected or provided through our websites and devices or applications (“Site”) and how we use personal information in connection with our services offered through the Site (“Services”).

For purposes of this Privacy Statement, “Personal Information” consists of information that specifically identifies or relates to a specific person. Personal Information does not include anonymous or aggregated information or information that no longer identifies or relates to a specific person.

By using the CPaT Site or Services or providing us your Personal Information, you expressly agree to this Privacy Statement and agree to our Terms of Service <http://www.cpat.com/privacy-policy/terms.pdf>. If you do not agree with any term in this Privacy Statement, please do not provide us your Personal Information or use the Site.

CPaT may transfer to, store or process your Personal Information in the United States or any other country in which CPaT or its affiliates, subsidiaries or service providers maintain operations. By using and providing information to CPaT through the Site or use of the Services, you agree and consent to the transferring, storing and processing of your Personal Information in any such country to enable CPaT to provide the Site and Service.

Anyone not of sufficient age to form a legally binding contract under applicable state law may not use our Site or Services. CPaT does not knowingly collect Personal Information from such persons.

INFORMATION WE COLLECT

We may collect the following categories of Personal Information about you through the Site, including but not limited to:

- Registration information: Basic registration information, such as an email address and password.
- Identification information: Specific information to confirm your identity, including your first and last name, username, address, and phone number.
- Third party credentials: Certain passwords, usernames, account numbers, and other account information for third party sites and Internet services (“Third Party Sites”).
- Information from Third Party Sites: Personal Information you have provided to Third Party Sites.
- Technical and navigational information: Information about your interaction with our Site such as computer browser type, pages visited, average time spent on our Site, IP address, unique identifier of the device, operating system version and app version.
- Location information: Location information from your device if you agree to allow us to collect such information.
- Other information: Other Personal Information such as feedback, questions, comments, suggestions, or ideas to provide you with other benefits or to improve CPaT’s Services.

NOTE: We do not collect any payment account information such as credit card number, expiration date, and credit card security code. CPaT uses a third-party billing and collection company to process payment of membership fees.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

We use your Personal Information to:

- Fulfill your requests for certain products and Services;
- Respond to your inquiries about our Services;
- Analyze Site usage and improve the Services provided through the Sites;
- Alert you to software compatibility issues and to improve our Site design and functionality;
- Deliver to you, administrative notices or alerts and communications relevant to your use of the Services;
- Offer you other products, programs, or services that we believe may interest you;

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- Perform market research, project planning, product development, troubleshooting problems, analysis of user behavior, marketing and promotions;
- Detect and protect against errors, fraud, or other criminal activity;
- Enforce our Terms and Conditions of Service and this Privacy Statement; and
- Inform you of a major company transaction such as a merger, sale of substantially all of our assets or corporate reorganization.

In addition, we may need to use your Personal Information as follows:

- **Verify Identity:** In order to allow you to use certain Services, we may require that you verify your identity. To do so, we may, directly or through third parties, use information you provide to order a credit report or to verify information you provide against third party databases or through other sources. We may also use your Personal Information to verify your identity if you contact us for assistance with the Sites or Services.
- **Pre-Fill Forms:** We may use your Personal Information to pre-fill form fields on the Sites for your convenience.
- **Pay Fees:** We may use credit card information you provide to charge your account to pay for Services to which you subscribe.
- **Third Party Sites:** We may access Third Party Sites on your behalf using Personal Information to obtain information that you requested.
- **Mobile Applications:** When you use CPaT's mobile application ("App") or mobile versions of our Sites on various mobile devices (e.g., tablets, smartphones, etc.) we may collect the unique device identifier assigned to that device by phone makers, carriers or makers of the operating system ("Device ID"). Device IDs allow App developers and others to identify your device for purposes of storing application preferences and other data.
- **Mobile Device Security:** We may use your Device ID for security purposes. For example, if you have activated a feature that limits access to a Service from a specific device, our systems will access the Device ID from each device you attempt to access the Service with to determine CPaT has specifically authorized that device.
- **Suspicious Activity:** Additionally, we may use Device IDs to monitor suspicious activity. For example, if we detect that multiple devices access a single account on a Site, as determined by tracking the Device IDs that access an account, we may contact you to ensure that you authorized such access.

HOW WE DISCLOSE PERSONAL INFORMATION

We will not, without your permission, sell, publish, or share your Personal Information to third parties for their marketing purposes.

CPaT may share your Personal Information with its affiliates and subsidiaries; however, our affiliates and subsidiaries will send you marketing communications only if you have requested such communications.

We may share your Personal Information with third party service providers to enable them to assist in fulfilling the requests you make or the transactions you conduct using the Sites, including the operation of certain Site functions and Services. We ensure that any third party acting on our behalf has agreed contractually to abide by our privacy practices and not use the information for any other purpose.

We reserve the right, in our sole discretion, to share or disclose your Personal Information with law enforcement, government officials, and other third parties:

- To respond to subpoenas, court orders, or legal process;
- To investigate, prevent, defend against, or take other action regarding violations of our Terms and Conditions of Use, illegal activities, suspected fraud or situations involving potential threats to the legal rights or physical safety of any person or the security of our network, Sites or Services;
- To respond to claims that any posting or other content violates the rights of third parties;
- In an emergency, to protect the health and safety of our Sites' users or the general public; or
- As otherwise required by any applicable law.

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We may share your Personal Information with other third parties with your consent or instructions to do so.

We may share or make available anonymous or aggregate information that cannot identify you with:

- Third parties for their research, marketing and promotional purposes and those third parties may publicly report the findings of their research or analysis; and,
- Organizations that conduct research into industry trends.

If a third party acquires our company or our assets, or if we undergo a merger, consolidation, change in control, transfer of substantial assets, reorganization or liquidation, we may transfer, sell, or assign to third parties, information concerning your relationship with us, including, without limitation, your Personal Information. Such third parties will assume responsibility for the Personal Information collected by us in connection with our business operations or through our Sites and such third parties will assume the rights and obligations regarding such information as described in this Privacy Statement.

HOW WE PROTECT THE INFORMATION WE COLLECT

We take the security of your information seriously. We use technical and administrative security measures such as but not limited to firewalls, encryption techniques, and authentication procedures to maintain the security of your online session.

YOUR CHOICES

We may send periodic Site related alerts, weekly summaries, notifications, newsletters, promotions, or other information via email. You may choose to stop receiving alerts, summaries, newsletters and promotions by indicating your preference in your account profile or settings. You may also follow the unsubscribe instructions in the email you receive. Please note that we will send certain Services-related messages necessary for the proper functioning and use of the Services and you may not have the ability to opt-out of those messages.

THIRD PARTY OFFERS, ADVERTISEMENTS, AND DATA COLLECTION

We may list a number of separate products and services offered by third parties on our Site and through the Service. These third party offers may complement your use of the Site and we may personalize such offers based on information you provide to us, we have collected about you, queries made through the Site or other information. If you choose to use these separate third party products and services, provide information to a third party, or allow a third party to collect information about you, then the third party's applicable privacy policy and terms of service will govern the third party's use of your information. You should review the practices of the third party before deciding to use their service or provide them with any information.

We may use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online promotions or analyze Site activity. We may permit these service providers to use cookies and similar technologies to perform these services.

We do not share any Personal Information about our customers with these third-party service providers, and these service providers do not collect such information on our behalf. For example, we may use service providers such as Google Analytics and Adobe's analytics services on parts of the Site to determine age, gender, interest and other data to better serve our customers. If you prefer to not have your data used by these service providers you may visit the Google Analytics opt-out page (<https://tools.google.com/dlpage/gaoptout/>) or Adobe's analytics service page (<http://www.adobe.com/privacy/opt-out.html>).

BLOGS AND OTHER FORUMS

We may offer bulletin boards, blogs, chat rooms, message boards, or similar public forums where you can communicate with us or other users who will have access to any information that you submit or post to these blogs or other forums; thus, you should consider any such information a publicly available. If you choose to post Personal Information, other viewers may use this information to send you unsolicited messages. We assume no responsibility for Personal Information you choose to post to these blogs and other forums. If you would like to request removal of your information from our blogs or other forums, please contact us using the information provided at the end of this Privacy Statement. We will make every effort to accommodate your request but we cannot guarantee that we can remove all such information. If that happens, then we will inform you.

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HOW WE USE COOKIES AND SIMILAR TECHNOLOGIES

To help operate the Site, enhance you experience, and collect information about online activity, we may place small data files on your computer or other device. These data files may include cookies, pixel tags, local shared objects, or other similar technologies. Cookies and similar technologies enable us to personalize our Site and Service for you. These technologies may allow us to store and manage your preferences and settings, measure and analyze how you use our Site and effectiveness of our communications, offer targeted products, programs and services, and help us improve our products, services, and security.

Most browsers provide you with the ability to block, delete, or disable these technologies. If you choose to reject cookies or similar technologies, this may result in limited availability or functionality of some Services. Please review your browser manufacturer's help pages for assistance with changing your settings.

DO NOT TRACK NOTICE

Without an industry or legal standard of interpreting Do Not Track Signals (“DNT”) sent to us by your browser, we do not respond to DNT signals at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/> (<http://allaboutdnt.com/>).

CHANGES TO YOUR PERSONAL INFORMATION

You may access, review, and update much of the information you have submitted to us at any time via the Site or Service.

You may choose to close or request that we delete your account for the Service at any time. We will use commercially reasonable efforts to remove your information, although we may retain some information. For example, we may retain some information on a backup server or media to help ensure continued availability of our Service.

We retain your Personal Information as long as necessary to provide the services you have requested.

Additionally, we may retain Personal Information to comply with law, prevent fraud, resolve disputes, trouble shoot problems, enforce our Terms and Conditions of Use, and as permitted by applicable law.

CHANGES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement periodically. When we do publish an update, any changes become effective immediately upon posting. The date last revised appears at the top of this Statement.

QUESTIONS?

If you have questions or concerns regarding this Privacy Statement, our security practices, or our information handling practices please contact: support@cpat.com