



1751 Pinnacle Drive Suite 1700
McLean, Virginia, 22102

Privacy is important to Verato, and we are committed to ensuring that your privacy is protected. This Privacy Policy lets you know how Verato uses and protects any information that you give Verato when you use this website.

This policy also provides you with information on how Verato collects, handles and stores your personal information in the course of providing services and business solutions to companies.

Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy policy. Verato may change this policy; you should check this page from time to time to ensure that you are happy with any changes. Verato will notify you in the event of material change to the policy, and will provide you annual notifications of the policy statement. We will do this either through clear posting to the website or if you tell us to directly notify you about changes to the Verato Privacy Policy and if you provide us with your e-mail address.

What are we collecting?

Personal information may be personally identifying information, sensitive information or non-sensitive information. We collect personal identifying information, sensitive information and non-sensitive information through either your interaction with the website and/or upon delivery of service to a company. Personal identifying information may include name, address (including e-mail address and IP address), date of birth, social security number, credit and/or financial account number, and protected health information. Sensitive information may include membership affiliation, demographic information including preferences and interests. Non-sensitive information may be information relevant to customer surveys and/or offers that cannot be used together to form personally identifiable information.

What are we doing with what we collect?

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Solution delivery to companies – we will collect, process, store and dispose of your information throughout the course of our service delivery to companies for the strict and limited purpose as identified in contract with that company;
- Improve our products and services – we continuously strive to improve our products and services and may use your information to improve our website or solutions;
- Marketing – We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided through the website;
- Research – We may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail based on the establishment of a relationship by you with us as you utilize our website. We may use the information to customize the website according to your interests to improve your experience and to improve our services.
- Audit logging and internal record keeping – We will monitor our website usage and the controls in place around the data processed by our staff for solution delivery according to state, federal and industry laws and regulations and in accordance with contractual and best-practices.

What security practices do we use?



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We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place administrative, physical, and technical policies and procedures to safeguard and secure the information we collect online and the information we collect, process, store and dispose of in the course of solution delivery to our clients/our partners.

We encrypt our database using AES 256, and further encrypt personally identifying information fields. Only trained staff with role-based access permissions may access the personally identifying data. We require two-factor authentication for staff to access this data through a dedicated VPN/VNC connection to a specific machine with a secure set of credentials.

How do we use cookies?

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which website pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Do we have links to other sites from the Verato website?

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide while visiting such sites, and those other sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

How do you control your data?

We believe that the control of your data is best left up to you, and that you are the best source for knowing if your data is correct or not. You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- If you have previously agreed to allow us to use your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us



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at privacy@verato.com.

- We will not sell, distribute or lease your personal information obtained from our website to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties that we think you may find interesting if you tell us that you wish this to happen.
- You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable to Verato for providing that information. If you would like a copy of the information held on you by Verato, please write to:

Verato
Attn: Director of Information Security & Compliance
1751 Pinnacle Dr
Suite #1700
Mclean, VA 22102 USA

- If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct information we collected directly from you and/or notify any data providers of a dispute in regards to your data. Please contact us at privacy@verato.com or send us a letter using the information below and the Verato personnel responsible for Privacy – the Director of Information Security & Compliance – will promptly address your concerns.

Verato
Attn: Directory of Information Security & Compliance
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Do we collect international data?

At this time, all the data we collect, process and store consists of only United States domestic data. All of our data stays within the US geographic region and does not pass or flow through international journeys.

Do we collect data from minors?

Our website and our solutions are marketed and directed for adults of at least 18 years-of age. Any minor, or person under the age of 18, should cease immediately from accessing and/or utilizing the Verato website or its services. If we become aware that we actually collected information from a minor under the age of 13, Verato will delete that information. Verato may collect, process or store any data from persons under the age of 18 years in order to perform solution delivery to companies. This information will not be collected from minors directly; this information will not be collected from minors online, or over the internet, or via our website.

California Privacy Rights

We do not share any personal information with third parties for the third parties' direct marketing purposes. If this practice changes, we will notify you by prominent posting on our sites. If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you



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to request and obtain removal of content or information you have publicly posted. Please send an email request with a detailed description of the specific content or information to privacy@verato.com. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.