



This Privacy Policy was last updated in December 2008.

Fididel, Inc (“**Fididel**”, “**we**”, or “**us**”) takes the privacy and protection of personal information very seriously. By visiting and using the Website, registering for and using the Software, using any other program or service Fididel may offer through the Website, or by generally using the Website or Services, you acknowledge that you accept the practices and policies outlined in this privacy policy (“**Privacy Policy**”). Unless otherwise defined herein, capitalized terms shall have the meanings assigned to such terms in the Fididel Terms of Use that you can find at Customerservices@fididel.com and which incorporate this Privacy Policy by reference.

What This Privacy Policy Covers

This Privacy Policy describes Fididel’s practices with respect to Personal Information and Anonymous Information that we collect when you use the Website or Website or Services. This Privacy Policy does not apply to the use of your Personal Information that is collected by third parties that Fididel does not own or control or do not support Fididel in providing the Website or Website or Services.

“**Personal Information**” is information that is personally identifiable like names, addresses, e-mail addresses, or phone numbers, as well as other non-public information that is associated with the foregoing.

“**Anonymous Information**” means information that is not associated with or linked to your Personal Information; Anonymous Information does not permit the identification of individual persons.

We collect and use Personal Information and Anonymous Information as described in this Privacy Policy from the users of the Website or Services.

BY USING THE WEBSITE OR WEBSITE OR SERVICES OR SUBMITTING PERSONAL INFORMATION THROUGH THE WEBSITE OR WEBSITE OR SERVICES, YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY.

YOUR PERSONAL INFORMATION MAY BE PROCESSED IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY AND BY USING THE WEBSITE OR SERVICES OR SUBMITTING PERSONAL INFORMATION THROUGH THE WEBSITE OR SERVICES, YOU ARE EXPRESSLY CONSENTING TO SUCH PROCESSING.

Personal Information We Collect



We collect the following Personal Information that you submit to us voluntarily:

- If you register for the Platform create an Account and to become a User, we collect your name, address, billing address, and all the information that is necessary to contact and receive payments from you for any fees due and payable in connection with your use of the Website or Website or Services.
- When you contact us to learn more about the Website or Website or Services, we will collect your name and your e-mail address.
- When you contact us by sending us an e-mail, we will collect any information that is contained in (and/or attached to) your e-mail.

Personal Information Collected Via Technology

As you use the Website or Services, certain information may also be collected passively, including your Internet protocol (IP) address and the browser that you use to visit the Website. Fididel also stores a small text file called a “**Cookie**” on your computer to store your login information (if any) and your personal preferences for the Website or Services. Fididel may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them). While you will still be able to use the Website or Services if you disable Cookies in your browser, certain parts of the Website or Services may not function as effectively.

Since the foregoing information may be collected when you are signed into the Website or Services, this information may be associated by us with Personal Information that we have collected from you.

We may also contract with advertisers in order to promote third party products and/or Website or Services by placing advertisements on the Website. Clicking on such advertisements will direct you to the website of a third party and the advertiser and/or third party may also use Cookies in connection with these advertisements. This Privacy Policy covers the use of Cookies by Fididel only and does not cover the use of cookies by any advertisers. Any advertisements appearing in conjunction with the Website or Services are delivered by third parties. For information about our advertising partners, please visit their websites through the links included in the presentation of the advertisements.

Personal Information From Other Sources

We may receive Personal Information about you from outside the Website, such as telephone, fax, mail, or from third parties that provide Website or Services for us that are related to the Website or Services. We may add this information to the information we have already collected from you via the Website or Services.



Use Of Information We Collect

In general, information (including Personal Information) you submit to us, or to third parties that support us in collecting information, is used by us to provide you and others with the Website or Services, to respond to requests that you make, to improve our Website or Services and to better tailor the features, performance and support of the Website or Services.

We may also use your Personal Information to provide you with notifications related to your use of the Website or Services, such as electronic newsletters or promotional e-mails, should you request to receive such communications from us.

We may create Anonymous Information records from Personal Information by excluding information (such as your name) that makes the information personally identifiable to you. We may also create Anonymous Information on how you use the Website or Services. We may use this Anonymous Information for internal purposes, such as analyzing usage patterns so that we may enhance the Website or Services, and we also reserve the right to use and disclose any Anonymous Information at our discretion.

Feedback

If you provide feedback about the Website or Services to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy.

Disclosure of Personal Information

Except as otherwise stated in this Privacy Policy, we do not disclose to or share your Personal Information with third parties, unless you ask or authorize us to do so.

We may provide your Personal Information to third party service providers and suppliers who work on behalf of or with us to provide you with some of the Website or Services and features of the Website or Services and to help us communicate with our users. However, these service providers and suppliers do not have any independent right to use this information except to help us provide the Website or Services.

We may share some or all of your Personal Information with any parent company, subsidiaries, joint ventures, or other companies under a common control (collectively, "**Affiliates**"), in which case we will require our Affiliates to honor this Privacy Policy.

In the event Fididel goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. You acknowledge that such transfers may occur, and that any acquirer of Fididel or its assets may continue to use your Personal Information as set forth in this Privacy Policy. You hereby consent to Fididel sharing your Personal Information under the above circumstances.



We may (and you authorize us to) disclose information we have collected from and about you (including Personal Information) if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; (b) to enforce any agreement we may have entered into with you and to enforce the Privacy Policy; or (c) to protect and defend the rights or property of us, other Users, or third parties.

Choices Regarding Personal Information

We will include unsubscribe instructions in each newsletter or promotional communication you receive from us.

We may send you service-related announcements (such as, but not limited to, notice that we have changed the Website or Services or the Privacy Policy) when we believe it is necessary to do so. You may not opt-out of these communications, which are not promotional in nature, but if you do not wish to receive these announcements, you have the option to terminate your account you may have with us. You understand that any termination of your account may involve deletion of your Account information from our live databases and all the information and data stored for such Account in the Website or Services. Fididel will not have any liability whatsoever to you for any termination of your account or related deletion of you information.

When we delete information that we have collected from or about you, it will be deleted from our active databases but may remain in our archives.

Links to Other Web Sites

The Website or Services may contain links to other web sites that are not owned or controlled by Fididel. The provision of such links is for your convenience and does not signify our endorsement of such web sites or location or its contents. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such other web sites. Please be aware that the terms of the Privacy Policy do not apply to any outside web sites.

Privacy of Minors

We do not intentionally collect or maintain information from persons under the age of 13.

Security and Confidentiality

Fididel has put in place commercially reasonable and appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. However, no company, including Fididel, can fully eliminate security risks associated with Personal Information.

Changes in this Privacy Policy



As part of the Terms of Use, this Privacy Policy is subject to occasional amendment, in accordance with the terms of the Terms of Use.

Contact Us

If you have any questions or suggestions regarding our Privacy Policy please contact us by sending us an e-mail to Customerservices@fididel.com.