

VELOCITON PRIVACY POLICY

This Privacy Policy ("Policy") governs how Velociton ("We", "Us") collects, uses, and discloses the personal information that Velociton may collect when You (if you are not acting on behalf of Yourself as an individual, then "You" means Your company or organization) have any interaction with Velociton, such as visiting a Velociton website, purchase or use a Velociton product or service, or when You communicate with Velociton in any way. Velociton takes Your privacy very seriously and this Policy describes what happens to Your personal information.

Please note that We review our privacy practices from time to time, and that our practices are subject to change. We ask that You periodically review the most current version of the Policy to ensure continuing familiarity. By visiting any Velociton website or using and Velociton product or service, You agree to be bound by the terms and conditions of this Privacy Policy. If You are entering into this agreement on behalf of a company or other legal entity, your acceptance represents that You have the authority to bind such entity to these terms. If You do not agree with the terms of this Privacy Policy, You are not permitted to access or use any Velociton website, product, or service.

1) Why does Velociton collect personal information?

We primarily collect personal information from You to provide You with a better product and user experience, respond to Your requests for support and information, inform You of promotions and special offers, and enable functionality in some of our products and services. We may also use Your information to resolve disputes, troubleshoot problems, detect and protect against error, fraud, or other criminal activity, and enforce our license agreement.

2) What information does Velociton collect?

We may collect two kinds of information:

- a) Personally identifiable information ("PII") - This can include names, phone numbers, mailing addresses, e-mail addresses, the name and version of Velociton products and services You access or own, and other information that We may specifically request.
- b) Non-personally identifiable information ("NPPI") - This kind of information primarily consists of hardware and usage data such as the model, manufacturer, operating system type and version, and unique identification/serial number of the device You use to access Velociton products or services. This may also include Your Internet Protocol (IP) address, browser type, referring web page and the date and time You perform certain actions using Velociton products or services.

3) When does Velociton collect personal information?

We generally collect NPPI whenever You access a Velociton product or service so that We can analyze how our products and services are used in order to improve them. We collect PII whenever You send Us such information, or when We specifically ask You for it in order to provide a product or service. When Velociton collects PII We make an effort to include a reference to this Policy.

4) Who is collecting personal information?

When You use a Velociton website, product, or service and provide Us with Your personal information, You are sharing that information with Velociton. Please be advised that in our products and services, We may include content from advertisers or websites that may also collect personally identifiable information about You. The information practices of those advertisers and websites are not covered by this privacy statement.

5) With whom does Velociton share my information?

Generally, Velociton will not disclose Your personal information (PII and NPII) unless We have Your permission or under certain circumstances, such as those described below:

- a) **Third-Party Service Providers:** We may employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, sending e-mail, analyzing data, providing marketing assistance, and processing credit card payments. They may have access to personal information needed to perform their functions.
- b) **Marketing Affiliates:** Velociton may share Your personal information with its marketing affiliates that it believes offer services and products that may be of interest to You.
- c) **Business Transaction:** Velociton reserves the right to transfer any and all information that We collect from visitors, or that We otherwise collect concerning or in connection with the Site, to a third party in the event of a sale or other transfer of assets or of any portion of our business. In the event Velociton enters a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, Your personal information may be among the assets transferred.
- d) We may disclose personal information where We have reason to believe that disclosing the information is necessary to identify, contact, or bring legal action against someone who may be violating the law, Velociton's license agreement, or may be causing injury to or interference with (either intentionally or unintentionally) Velociton's rights or property, other users, or anyone else that could be harmed by such activities. Velociton may disclose personal information when We believe in good faith that the law requires it and for administrative and other purposes that We deem necessary to maintain, service, and improve our services.
- e) We cannot ensure that all of Your private communications and other personal information will never be disclosed in ways not otherwise described in this Policy. For example, We may be forced to disclose information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse Your personal information that they collect. We use industry standard practices to protect Your privacy, however, We do not promise, and You should not expect, that Your personal information or private communications will always remain private.

6) What are my choices regarding the collection, use, and distribution of my information?

You generally do not have to disclose PII to access Velociton websites. Certain products and services do require that You submit PII in order to use them, and those products and services specify what information is collected. If You choose to contact Us, We may need certain information to help Us respond to Your request.

7) How may I use other users' information?

You may not collect our users' information for any purpose. In addition, recognizing the global nature of the Internet, You agree to comply with all applicable local laws and rules regarding online conduct and privacy, as well as content. Specifically, but not as a limitation, You agree to comply with all applicable laws regarding transmission of technical and personal data exported from the United States or the country in which You reside.

8) What security precautions are in place to protect the loss, misuse, or alteration of my information?

Whenever Velociton handles Your personal information, We take steps to ensure that Your information is treated securely and in accordance with this Policy. We use procedural and mechanical safeguards to protect Your personal information against loss or theft, unauthorized access, and disclosure. However, no data transmission over the Internet can be guaranteed to be 100% secure. We cannot, therefore, warrant or ensure the security of any information You transmit to Us, and You do so at Your own risk.

9) How is the privacy of children protected?

Children under the age of 18 are not authorized to use any Velociton website, product, or service, and We ask that children do not submit any personal information to us. If We determine or are informed that a minor under 18 submitted personal information to Us, We will attempt to delete that information within a reasonable timeframe.

10) Does Velociton use "cookies" and what are they?

Data collection devices, such as "cookies", are used to store, and sometimes track, information about You. Generally, these cookies help provide personalized services and promote trust and safety. A cookie is a small file containing a small amount of data that is sent to You from a web server and placed in Your device's memory to assist Us in providing our services. Cookies are only read by the server that placed them and are unable to execute any code or virus. Most cookies are "session cookies," and are automatically deleted at the end of a session.

More specifically, We use cookies to research and understand how our users' habits are similar or different from one another so that We can make each new experience with Velociton a better one. We may also use this information to better personalize the content, banners, and promotions that You and other users will see within Velociton websites, products and services. You are always free to decline our cookies, however please know that doing so may interfere with the proper functioning of certain portions of our websites, products, and services.

11) What is an IP Address and how does Velociton use it?

When You access any information over the Internet, such as a Velociton website or service, You send the web server the address where it should return the information. This is called Your "IP address" (IP stands for "Internet protocol"). We record the IP Addresses that access Velociton websites and services along with related information such as Your browser type and operating system. This information helps Us, in part, learn about the geographical distribution of our website visitors and the technology they use to access our site so that We can improve our products and services.

12) How can I contact Velociton with regard to this Privacy Policy?

Any questions regarding this statement should be directed to privacy@velociton.com

This Policy is the sole authorized statement of Velociton's practices with respect to the online collection of personal information and the usage of such information. Any summaries of this Policy generated by third party software or otherwise shall have no legal effect, are in no way binding upon Velociton, shall not be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

Please note that this Policy applies solely to our online information-gathering and dissemination practices in connection with our websites, products, and services, and does not apply to any of our practices conducted offline.

Last Updated: 02/27/2010