

## **OLAFE PRIVACY POLICY**

### **INTRODUCTION**

At OLAFE, LLC ("OLAFE") we recognize that privacy is important. This Policy applies to all of the products, services and websites offered by OLAFE or its subsidiaries or affiliated companies (collectively, OLAFE's "services"). In addition, where more detailed information is needed to explain our privacy practices, we post separate privacy notices to describe how particular services process personal information. By your affirmative act of either registering as a new customer of OLAFE, or purchasing one of our products and services; downloading free evaluation software, upgrades, or white papers; ordering e-mail newsletters, responding to a marketing campaign, or placing orders on the OLAFE branded web sites like [www.olafe.com](http://www.olafe.com) site, you authorize the collection, use, and disclosure of personal information by OLAFE as provided for under OLAFE's then-current Privacy Policy.

When you register with OLAFE or respond to its surveys, or take advantage of its features, offerings or content, you provide OLAFE with personally identifiable information. This Policy explains the information practices that apply to your OLAFE information, as well as the choices you can make about the ways this information is used.

This Privacy Policy applies only to information about you collected by OLAFE and does not apply to information about you collected by third party Web sites linked to or otherwise accessible from offerings presented by OLAFE. The information collected or received by third party Web sites is subject to their own privacy policies.

### **OBLIGATIONS UNDER THIS POLICY – Acceptance of this Agreement**

All OLAFE Customers and all others who use the OLAFE services (the "customer," "user," "you," or "your") must comply with this Policy. Your failure to comply with this Policy could result in the suspension or termination of your Service account. If you do not agree to comply with this Policy, you must immediately stop all use of the Service and notify OLAFE so that it can close your account.

### **Changes to this Privacy Policy and Additional Information**

OLAFE may, at its sole discretion, revise this Policy from time to time by posting a new version on the Web site at <http://www.olafe.com/legal/> or any successor URL(s) (the "OLAFE Web site"). Revised versions of this Policy are effective immediately upon posting. Accordingly, OLAFE customers should read any OLAFE announcements they receive and regularly visit the OLAFE Web site and review this Policy to ensure that their activities conform to the most recent version. Also, OLAFE may offer premium services and features in the future, and if these services and features are not described in this policy, OLAFE will provide you with additional privacy related information.

### **Collected Information**

OLAFE asks you for information when you register as a customer, purchase one of our products and services; download free evaluation software, upgrades, or white papers; order e-mail newsletters, respond to a marketing campaign, or place orders on the OLAFE branded web sites like the [www.olafe.com](http://www.olafe.com) site. We use the information we gather to improve the user experience on our site and



the products and services we offer. Information will be used to make sure all products and services are operating correctly, and to provide the appropriate level of support.

In addition, we may use your information to improve the content of our Web site, products, and services; to alert you to product upgrades, updates, and renewal information regarding our products and services; and to share special offers, product announcements, and other new services from OLAFE. When you register or make a purchase, we offer you the opportunity to opt into or out of these uses of your information. If you do not choose to opt out initially, you may still block future contact of this type by simply following the unsubscribe instructions that accompany all such communications, or by contacting us at the above address.

We e-mail service notifications to inform you about the status of your service orders or accounts, and to provide updates and technical notices. These messages are essential to maintain your subscription and the functionality of our services, so there is no opt-out available for service notifications, and these messages cannot be blocked.

### **Use of Your OLAFE Information**

Your OLAFE information, including the contents of your online communications, may be accessed and disclosed in response to legal process (for example, a court order, search warrant or subpoena), or in other circumstances in which OLAFE has a good faith belief that OLAFE is being used for unlawful purposes. OLAFE may also access or disclose your information when necessary to protect the rights or property of OLAFE or in special cases such as a threat to your safety or that of others.

### **Sharing of Information**

Your OLAFE information will not be shared with third parties unless it is necessary to fulfill a transaction you have requested, or in other circumstances in which you have consented to the sharing of your information. OLAFE may share your information with subsidiaries, affiliated companies or other trusted business partners or persons who act on our behalf for the uses described herein.

### **Customer Choice**

If you do not want OLAFE to contact you or your company for marketing purposes by e-mail, postal mail, fax and/or phone, you may opt out by contacting our customer service department, by sending e-mail, or writing to us at the above address.

Please note that we do not allow our customers to opt out of contact that is required for the functionality of our products and services.

### **Security of Information**

OLAFE uses state-of-the-art security technology to protect our customer data. Access to customer information is restricted to authorized personnel only. Credit card numbers are only used for payment processing and automatic renewals, where applicable, and are never retained for marketing or other purposes.



OLAFE may use agents and contractors to perform functions on behalf of OLAFE. Examples include analyzing data, providing marketing assistance, performing credit checks and approvals, providing electronic mail services, processing credit card payments, collecting on delinquent accounts and providing customer service. If such agents and contractors have access to personally identifiable information, they are required to protect this information in a manner that is consistent with this Privacy Policy and with applicable law (including the Communications Act of 1934, as amended, and the CPNI rules of the Federal Communications Commission, 47 C.F.R. §64.2001 *et seq.*) by, for example, not using the information for any purpose other than to carry out the services they are performing for OLAFE.

### **Change of Ownership of OLAFE**

In the unlikely event that ownership of OLAFE was to change as a result of a merger or acquisition by another company, your OLAFE information may be transferred. OLAFE will provide you notice prior to any such transfer of your OLAFE information. If such a transfer results in a material change in the use of your OLAFE information, OLAFE will also provide you notice about the choices you have to decline to permit such a transfer.

### **Access to Information**

If you are a home user or consumer and you wish to view or correct OLAFE's information about you or your company, please update your profile on the OLAFE web site. Business or institutional customers who wish to change or view information should contact their sales representative or contact us at the above address.

### **Governing Law**

The laws of the State of New York shall in all respects govern this Policy and Agreement as though this Agreement was entered into, and was to be entirely performed, within the State of New York; and each Party hereby irrevocably consents to the exclusive jurisdiction of, and venue in, any state or federal court of competent jurisdiction located in the County of Westchester, State of New York.

### **Enforcement**

Please feel free to direct any questions or concerns regarding this Policy or treatment of personal information by contacting us. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between OLAFE and an individual.