

## **PeopleKeys Privacy Policy**

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People Keys, Inc. and associated companies/entities ( "PeopleKeys") is committed to complying with all laws intended to protect your right of privacy. This Privacy Policy describes (i) the type of information about you that we collect; and (ii) PeopleKeys' practices with respect to gathering and disseminating information about you. This Privacy Policy was established within the context of our PeopleKeys Website and the potential for gathering personal information within electronic media; however, this Policy is not limited to the PeopleKeys Website. Our Privacy Policy applies whenever users and PeopleKeys interact and there is a possibility that during such interaction, we may acquire certain information about our users.

Clients' and End Users' purchase of assessments or other products from PeopleKeys and/or registering on the PeopleKeys web site constitutes acceptance of this Privacy Policy.

### **How And When Does PeopleKeys Collect Non-Public Personal Information?**

In the course of providing services, we may collect and maintain certain nonpublic personal information that will help us to provide assessment services.

PeopleKeys does not collect personal information (such as names, addresses, phone numbers, email addresses or credit card numbers) except when specifically provided by an individual on a voluntary basis. Personal information may be collected as users:

- Become a registered user of the PeopleKeys Website
- Purchase assessments or products
- Complete assessments
- Sign-up or subscribe for products or services that we may periodically make available
- Participate in special promotions

### **How And When Does PeopleKeys Use Non-Public Personal Information?**

PeopleKeys may utilize personal information in several discrete ways to perform services as requested and contracted by Clients and End Users.

When purchasing online assessments or other products, PeopleKeys utilizes personal information to complete the purchase transaction and to communicate with users about the purchase or other inquiry.

In addition, when purchasing assessments or products, PeopleKeys may be required to share personal information with a third party credit card processor to facilitate completion of the transaction. The credit card processor may share the same information with the credit card issuer for the issuer's use in connection with gathering data related to use of their cards,

rewards programs or other purposes. End Users are urged to read and become familiar with the privacy policies governing the use of credit cards.

Also, when purchasing or completing online assessments, PeopleKeys may be required to pass your personal information and assessment results to Clients for the specific purpose of reviewing assessment results. Under those circumstances, information voluntarily input by End Users will be shared with the specific Client who requested the assessment by the End User.

PeopleKeys Clients are not subject to the provisions of this privacy statement, which means that they may use personal information for purposes other than contacting the End User. PeopleKeys has no control over the use of your personal information by Clients and End Users agree that PeopleKeys is not liable for any use of personal information by a Client. If End Users have special preferences concerning use of your personal information by Client, End Users must communicate those preferences directly to them.

When visiting our Website, PeopleKeys may also gather certain information about your usage of our website and your computer's browser that we aggregate (see "Aggregate Information" described below).

Finally, PeopleKeys may occasionally contact you, typically by email, to notify you of information regarding your transaction. Additionally, PeopleKeys may contact you regarding offerings of future events products or services that may be of interest to you. If you are not interested in receiving email notices or advertisement from us, you can unsubscribe at any time.

### **How Long Is Your Personal Information Retained?**

PeopleKeys may retain personal information as long as users maintain registered status and/or to comply with hiring laws and regulations, if appropriate. For Users who purchase assessments or other products using a credit card, we retain credit card information for a length of time reasonably necessary to process any future transactions related to purchases, including refunds and charge backs. PeopleKeys may occasionally purge our computer system of information relating to visitors of our Website and their past transactions.

### **What Is "Aggregate Information" And What Does PeopleKeys Do With It?**

Typically, as visitors browse our Website, our computers automatically collect information related to how certain features of our Website are used, what general region our visitors are contacting us from and how many people visit our Website at any given time. We only use this information in the aggregate, which means that we only derive meaning from the sum of all such information gathered for a period of time and accordingly, we refer to this information as "Aggregate Information". Aggregate Information includes, but is not limited to your computer's (i) Internet browser type (e.g., Microsoft Internet Explorer 5.5), (ii) IP address, (iii) resolution settings, (iv) platform type, and (v) originating URLs of referring web pages. We use Aggregate

Information to (a) help diagnose problems with our computers, (b) administer our Website, (c) share certain generalized demographic information with Event Hosts and our advertising partners about visitors of our Website, and (d) provide our advertising partners with information regarding which visitors saw and clicked on certain advertisements on our Website. Aggregate Information does not contain any personal information of any of our Website visitors.

### **What Are “Cookies” And How Does PeopleKeys Use Them?**

The term “Cookie” is a nickname for files that a website's computer system can deposit onto a visitor's computer hard drive when the visitor is logged on to the website. Cookies are used to recognize a visitor's repeat visits to the website and what pages are accessed and what functionalities are used while he or she is there. The use of cookies is commonplace on the Internet and they take up minimal room on your computer hard drive. Cookies work by assigning a number to your computer that has a specific meaning to the assigning website. Cookies, by themselves, cannot be used to find out the identity of any visitor. Unless you choose to provide us with information about you, we will never know who you are, even though our computer has previously deposited a cookie on your computer's hard drive. Other companies that advertise on our Website also have the ability to deposit a different cookie on your computer's hard drive in a process that we do not control. Since cookies aren't useable for identifying individuals (i.e., we will not store non-public personal information in a cookie), these advertisers will never know who you are. In addition, you may modify your Internet browser's settings to notify you whenever any website is going to deposit a cookie on your computer's hard drive. This notification option generally gives you the opportunity to decide whether to accept or refuse a cookie before it is deposited. There may be some features on our Website, however, that require a cookie to operate correctly. For example, to become a registered user of our Website, you must allow us to deposit a cookie on your computer's hard drive.

### **Consent/Choice Statement**

PeopleKeys does not sell or rent personal information about our on-line customers to any third parties. PeopleKeys will not rent or sell non-public personal information we collect from users except (1) as required by law or (2) with the express authorization or consent of the user.

### **Data Quality and Security Statement**

PeopleKeys uses data security systems to encrypt personal and financial information to reduce the risk that information will be obtained by unauthorized persons. Our electronic security measures are complemented by the physical security of our facilities and limited access to certain critical areas, such as our computer locations. Daily online backups are completed nightly for all data in the PeopleKeys website.

PeopleKeys systems are housed in a data center which offers a prebuilt, leading edge information technology infrastructure. This data center offers redundant power systems (flywheel power system and diesel generator), redundant communications connection, environmental controls (air conditioning and dry fire suppression), and security (alarm system, surveillance cameras, smart card locks, and double doors).

About Security: PeopleKeys systems are housed in a data center which provides double door security on all entrances to the building with the first door of each entrance requiring a key. The second door is protected by a card access system and a video surveillance system. Additionally, the data center receives professional security and fire alarm services. Each data center associate is provided with a unique PIN to the security alarm system and knows how to set-off the panic alarm in case of emergency. All entrances are secured by the security system. Additionally, all servers and cabinets remain locked unless they are undergoing active maintenance. Cameras monitor and record all entrances and exits from the premises.

Unfortunately, because of the increasing sophistication of computer hackers and others who would seek to invade computer systems for the purpose of stealing information, damaging systems or denying systems' ability to operate effectively to safeguard personal and financial information as intended, PeopleKeys cannot guarantee the security of personal or financial information in our possession or the impenetrability of our computer systems under unusual circumstances or our computer system's resilience to future sophisticated attacks.

### **When Might Information Be Disclosed As A Matter Of Law?**

PeopleKeys may disclose non-public personal information to unrelated parties in special cases when we have reason to believe that that disclosure is necessary to identify, contact, or bring legal action against a person or persons who may be causing injury to, or interference with, the rights or property of PeopleKeys (including our Website), computer users accessing our Website, or any third party. In addition, PeopleKeys may disclose information about individuals who access our Website to law enforcement agencies, judicial or government authorities, or to other individuals or entities in response to subpoenas, court orders, or other legal processes.

### **Links To / From Other Sites**

The PeopleKeys Website may contain links to other Internet websites which we do not operate and, conversely, other Internet websites may contain links to our Website. We are not aware of and are not responsible for the privacy policies, practices, or content of such other websites. We encourage users to read and become familiar with the privacy policies maintained by such other websites.

## **Information of Minors & Children**

PeopleKeys does not target our Website or our products or merchandise for sale on our Website to children, and our Website does not seek to collect contact information from children under the age of 13. If you are under the age of 13, please do not email us, contact our Website, attempt to use our Website, submit information to our Website, or ask us to email you. If you are under the age of 18, you should get permission from a parent or guardian before you email our Website, contact our Website, attempt to use our Website, submit information to our Website, or ask us to email you.