

Aptara, Inc. ("Aptara") Privacy Policy

Aptara's Commitment to Data Privacy Protection

Protecting the security and privacy of your personal data is important to Aptara; therefore, Aptara conducts its business in compliance with applicable laws on data privacy protection and data security. Aptara hopes the policy outlined below will help you understand what data Aptara may collect, how Aptara uses and safeguards that data and with whom Aptara may share it.

1. Scope. This Privacy Policy ("Policy") applies to all personal data, including name, address, social security number, telephone number, email address, banking account or credit card details, medical information, passwords or other personally identifiable or sensitive information as defined by applicable law ("Personal Data") that Aptara collects or receives from or through the performance of services for its clients inside and outside the United States (Client") and those it transfers into the United States, whether manually or digitally processed. The Policy governs Aptara and each of its subsidiaries and affiliates.

2. Our Services. Aptara provides content production and management services ("Services") for Clients located around the globe. Clients retain Aptara to transmit messages and to provide information to their customers and others ("Recipients"). In such cases, Aptara acts as an agent/data processor for its Clients to perform the Services and Aptara relies on its Clients to comply with all applicable personal data privacy laws in compiling and providing Aptara with the Recipient information.

Through its Website, Aptara will not collect any Personal Data about you unless you: (1) voluntarily choose to provide Aptara with it in order to obtain goods or services or respond to a survey; (2) provide your consent; (3) or unless otherwise permitted by applicable laws and regulations.

3. Purpose of Use. When you do provide us with Personal Data via its Website, Aptara usually uses it to respond to your inquiry, process your order or provide you access to specific information. Also, to support our customer relationship with you, Aptara may store and process Personal Data and share it with our worldwide subsidiaries and affiliates. If you choose not to have your Personal Data used to support our customer relationship, we will respect your choice.

Aptara may employ third parties to host or support its Websites, applications or Service. These parties may have access to your

information to perform such tasks.

Aptara does not sell or otherwise market your Personal Data to third parties, except Aptara subsidiaries and affiliates.

4. Other Information Collection. Aptara will collect, use or disclose Personal Data supplied by you online only for the purposes disclosed by you, or as provided herein, unless the disclosure: (1) is a use of the Personal Data for any additional purpose that is directly related to the original purpose for which the Personal Data was collected; (2) is necessary to prepare, negotiate and perform a contract with you; (3) with your consent; (4) is reasonably necessary to provide Services to you or Aptara's Clients, (5) is necessary to communicate with you regarding employment or business opportunity; (6) is required by law or governmental or judicial authorities; (7) is necessary to establish or preserve a legal claim or defense; (8) is necessary to prevent fraud or other illegal activities, such as willful attacks on Aptara information technology systems.

Aptara may also collect Personal Data when Clients or Recipients contact us with a question or concern about this Privacy Policy or about our Services. If Personal Data is provided to Aptara in this context, we will use it only to respond to a specific inquiry or otherwise as required by law.

5. Communications or Utilization Data. Through your use of telecommunications services to access our Website, your communications data (i.e., Internet protocol address) or utilization data (i.e., information on the beginning, end and extent of each address, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to Personal Data. To the extent there is any compelling necessity, the collection, processing and use of your communications or utilization data will occur and will be performed in accordance with applicable data privacy laws.

6. Transfer of Personal Information. As noted above, we utilize the Personal Data of Recipients only as directed by our Clients in the performance of the Services. We do not disclose Personal Data of Recipients to third parties except to our Clients or to authorized service providers - which may be affiliated or nonaffiliated companies and may be located outside your country of residence - who assist us in performing the Services and who are bound by the terms of this Privacy Policy, unless otherwise required by law. Because we simply process the information provided to us, our Clients remain responsible for that Personal Data with respect to the individuals concerned. We may transfer your information if we sell or transfer all or a portion of Aptara's business or assets.

7. Non-Personal Data Collected Automatically. When you access our Website, we may automatically collect non-personal data (i.e., type of Internet browser and operating system uses, domain name of the Website from which you came, number of visits, average time spent on the site, pages viewed). We may use this non-personal data and share it with our worldwide affiliates to monitor the attractiveness of our Website, improve performance or content or for other marketing purposes.

8. Cookies. When you view Aptara's Website, we may store some data on your computer in the form of a "cookie" to automatically recognize your PC next time you visit. Cookies can help us in many ways, for example, by allowing us to tailor a Website to better match your interests or to store your password to save you having to re-enter it each time. By visiting our Website, you consent to the placement of cookies in your browser and device in accordance with this Privacy Policy. If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer's hard drive, block all cookies or to receive a warning before a cookie is stored.

9. Children. Aptara's website is not aimed at children and Aptara will not knowingly collect Personal Data from children without insisting that they seek parental consent if required by applicable law. We will only use or disclose Personal Data about a child to the extent permitted by law, to seek parental consent, or to protect a child.

10. Security Practices. To protect your Personal Data against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure or access, Aptara utilizes reasonable technical, operational and physical security measures and has a documented security plan. Personal Data is stored on our own servers, with access restricted to those Clients to which the Personal Data in question relates and to employees or contractors who have a need for such access to perform a legitimate business purpose relating either to the Services or to maintenance, internal security or related issues. Any contractor whom we retain to provide services for us and who will have access to Personal Data must agree in writing to abide by the terms of this Privacy Policy.

11. Data Integrity. We only use Personal Data that is necessary to perform the Services requested and it remains secure until destroyed or returned to the client. We only store Personal Data when specifically requested to do so by a Client or as part of our ordinary back-up, archiving process. Archived files are secured consistent with paragraph 10 above and are destroyed on a regular cycle.

12. Questions and Comments. Aptara will respond to reasonable requests to review Personal Data, withdraw your consent and to correct, amend or delete any inaccuracies as follows:

Individuals seeking access to Personal Data that Aptara received from its Clients may be directed to the Client directly. All of Aptara's messages should prominently display the name of the Client on whose behalf the message was sent. We also would be happy to provide any interested Recipient the applicable Client's name and contact information.

Individuals seeking access to Personal Data about themselves that Aptara has collected via its Website must contact our Corporate Privacy Officer as directed below. We will make reasonable efforts to provide the requested information promptly if it is still available to us, although we reserve the right to charge the requester for the cost (in time and expenses) of retrieval.

13. Privacy Policy Changes. Aptara reserves its right to change, modify or update this Privacy Policy at any time without notice. Aptara will post changes to our Privacy Policy on this page. Please check this page regularly to keep up-to-date.

14. Corporate Privacy Officer. To contact our Corporate Privacy Officer when indicated by this Policy or to address questions or concerns regarding Aptara's privacy practices, please e-mail: Privacy@aptaracorp.com. Letters may be sent to: Aptara, 3110 Fairview Park Drive Suite 900, Falls Church, VA 22042, Attn: Corporate Privacy Officer.