

# Coffey Communications Privacy Policy

## Last Changes to Privacy Policy: January 28, 2010

We are strongly committed to protecting the privacy of your personal information. The policies below are applicable to the [www.coffeycomm.com](http://www.coffeycomm.com) website ("Website") produced and maintained by Coffey Communications, Inc. (collectively "Company," "we," "us", or "our"). We have established this privacy policy ("Privacy Policy") to let you know the kinds of personal information we may gather during your visit to the Website, why we gather your information, what we use your personal information for, when we might disclose your personal information, and how you can manage your personal information.

Please be advised that the practices described in this Privacy Policy apply only to information gathered online at our Website. It does not apply to information that you may submit to us offline, or to websites maintained by other companies or organizations to which we may link.

**By visiting our Website, you are accepting the practices described in our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Website. We reserve the right to modify or amend the terms of our Privacy Policy from time to time without notice. Your continued use of our Website and our affiliate sites following the posting of changes to these terms will mean you accept those changes. If we intend to apply the modifications or amendments to this Privacy Policy retroactively, we will provide you with notice of the modifications or amendments.**

If you have any questions about this Privacy Policy or don't see your concerns addressed here, you should contact us by email at [info@coffeycomm.com](mailto:info@coffeycomm.com).

## **What Information About Me Is Collected and Stored?**

Company adheres to the highest standards of ethical practices in all of our operations and is dedicated to protecting the privacy of all visitors to our Website. **Our privacy policy is simple: Except as disclosed below, we don't sell, barter, give away, or rent your personal information to any company outside of Company.**

### **Personal Information**

The Website collects and stores the information, including any personally identifiable information, such as subscriber name, subscriber website, user ID, email address, telephone numbers, billing information, and demographic information such as age, gender and zip code ("Personal Information"), that you enter into this Website or that you provide through our help desk, customer service representatives, or requests for more information. Registration may also be required and Personal Information may also be collected in certain portions of the Website in which you specifically and knowingly provide such information (e.g. community postings, chat or bulletin boards, blog comments, if any). We also may collect and store information about you that we receive from other sources, to enable us to update and correct the information contained in our database.

### **Anonymous Information**

In addition, when you interact with the Website, our servers may keep an activity log that does not identify you individually ("Anonymous Information"). Generally, this information is collected through "traffic data". We collect and store certain administrative and traffic information with each use of the service or Website including: source IP address, time of access, date of access, web page(s), software crash reports, type of browser used, session identification number, search terms, search results, access times and referring websites addresses.

## **Use of Cookies and Spyware**

We never use or install spyware on your computer, nor do we use spyware to retrieve information from your computer.

Also, like many websites, we use “cookies”, which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences. We use cookies to track use of our Website and online services. We may also use cookies to monitor traffic, improve the Website and make it easier and/or relevant for your use. You may occasionally get cookies from companies advertising on our behalf. We do not control these cookies, and these cookies are not subject to this cookie policy.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but, if you prefer, you can usually modify your browser setting to decline cookies. Declining cookies may however negatively impact the functioning of the Website and your use of it. For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org).

This Website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help the Website analyse how users use the Website. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on Website activity for Website operators and providing other services relating to Website activity and Internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. By using this Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## **Is Information Collected From Children?**

This is not a Website directed to children under the age of 13, and Company does not knowingly collect Personal Information from children under 13 years of age. If you are under 13 years of age you should not use this Website, and under no circumstance should you send information about yourself to Company. If Company discovers that a child under the age of 13 has provided Company with Personal Information, Company will immediately delete that child’s information from the Website.

## **How We Use Your Information?**

We use the information we learn from you to help us personalize and continually improve your experience on the Website. We use the information to handle orders, deliver products and services, process payments, communicate with you about orders, products, services, promotional offers, update our records and generally maintain your accounts with us. We also use this information to improve our platform, prevent or detect fraud or abuses of our Website and, as described below, enable third parties to carry out technical, logistical or other functions on our behalf. Except as disclosed in this Privacy Policy, we do not use or disclose information about your individual visits to our Website or your Personal Information collected online to any companies not affiliated with us.

## **Customer Service and Feedback**

We may use your Personal Information to fulfill orders, provide customer service, track your compliance with the Website’s rules and regulations, or for editorial and feedback purposes (to the extent that is explained when you provide the information). In the event we plan to publicly post any of your Personal Information on a Website (as, for instance, a letter), we will request your permission to provide such posting.

### **Use of Anonymous Information**

We use Anonymous Information to help us determine how people use parts of the Website and who our users are so we can improve our Website and ensure that it is as appealing as we can make it for as many people as possible. We also use Anonymous Information to provide statistical "ratings" information in aggregated form to our partners and other third parties about how our users collectively use Website. We may also use or share Anonymous Information (or other information, other than Personal Information) in any other manner that we deem appropriate or necessary.

### **Third-Party Agents**

We occasionally have third party agents, subsidiaries, affiliates and partners that perform functions on our behalf, such as marketing, analytics, credit card processing, shipping or stocking orders, providing customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that Personal Information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services to the Website.

### **Transactional partners**

We may share non-personal information with our partners and others from time to time. Examples of such non-personal information include the number of users who visited this Website during a specific time period. This information generally is shared in an aggregated form.

### **Emergency Situations**

We may also use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the Website; (b) protect and defend our rights or property, the Website or our users, and (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or the users of the Website or the public.

### **What Steps Are Taken To Keep Personal Information Secure?**

The importance of security for all Personal Information associated with you is of utmost concern to us. We exercise great care in providing secure transmission of your information from your PC to our servers. Personal Information collected by our Website is stored in secure operating environments that are not available to the public. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

While we try our best to safeguard your Personal Information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

### **Your Obligations to Keep Your Access Rights Secure**

You promise to: (a) provide true, accurate, current and complete information about yourself and your business as prompted by the Website's registration form (such information being the "Registration Data") and (b) maintain and promptly update the Registration Data to keep it true, accurate, current and complete. If you provide any information that is untrue, inaccurate, not current or incomplete, or Company has reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete, Company has the right to suspend or terminate your account and refuse any and all current or future use of the Website (or any portion thereof). You are entirely responsible for the security and confidentiality of your password and account. Furthermore, you are entirely responsible for any and all activities that occur under your account. You agree to immediately notify us of any unauthorized use of your account or any other breach of security of which you become aware. You are responsible for taking precautions and

providing security measures best suited for your situation and intended use of the Services and Website. Please note that anyone able to provide your personally identifiable information will be able access your account so you should take reasonable steps to protect this information.

### **What Happens When I Link To or From Another Web Site?**

This Website may contain links to other websites operated by affiliates of Company or third parties. Please be advised that the practices described in this Privacy Policy for Company do not apply to information gathered through these other websites. These other sites may also send their own cookies to you, collect your data or solicit your Personal Information. Always be aware of where you end up. We are not responsible for the actions and privacy policies of third parties and other websites. We encourage you to be aware of when you leave this Website and read the privacy policies of each and every website that you visit.

### **Public Areas, Chat Rooms and Newsgroups**

Please remember that any information you share in public areas, such as message boards or feedback sections, becomes public, and therefore this Privacy Policy does not apply to any information you choose to make public. Please be careful about what you disclose and do not post any Personal Information that you expect to keep private.

### **Governing Law/Assignment**

The Website is published in the United States. We make every effort to protect the Personal Information of all users the Website. We attempt to comply with local data protection and consumer rights laws to the extent they may apply to the Company services. If you are uncertain whether this Privacy Policy conflicts with the applicable local privacy laws where you are located, you should not submit your Personal Information to Company.

We may change ownership or corporate organization while providing the Website and services. As a result, please be aware that we may transfer your information to another company that is affiliated with us or with which we have merged. Under such circumstances Company would to the extent possible require the acquiring party to follow the practices described in this Privacy Policy, as it may be amended from time to time.

### **Notice to Users Outside the United States**

If you are located outside the United States of America, you should be aware that your Personal Information will be transferred to the United States of America, the laws of which may be deemed by the other countries to have inadequate data protection. If you are located in a country outside the United States of America and voluntarily submit Personal Information to us, you thereby consent to the general use of such information as provided in this Privacy Policy and to the transfer of that information to, and/or storage of that information in, the United States of America.

### **Changes to This Policy**

We are committed to maintaining the Website's position as a premier website on the Internet. As our Website continues to develop, we may add new services and features to our Website. In the event that these additions affect our Privacy Policy, this document will be updated appropriately. We will post those changes prominently so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. We do, however, recommend that you read this Privacy Policy each time you use our Website in case you missed our notice of changes to the Privacy Policy. We will never, however, materially change our policies and practices to make them less protective of customer information we have previously collected without your express consent.

## **How Do I Opt-Out or Correct Information about Me**

You may always opt-out of receiving future e-mail messages and newsletters from Company. We provide you with the opportunity to opt-out of receiving communications from us at the point where we request information about you. We also give you access to a broad range of information about your account to permit you to correct or update Personal Information that you have previously provided to us.