# **TRUSTe Privacy Statement**

Effective Date: March 2, 2010

### Introduction

Protecting personally identifying information is a core TRUSTe value. This Privacy Statement describes how TRUSTe collects and uses the personally identifying information you provide on our Web sites and on TRUSTe Internet applications that appear on third party websites. It also describes the choices available to you regarding TRUSTe's use of your personally identifying information and the steps you can take to access this information and to request that we correct or delete it.

TRUSTe abides by the Safe Harbor Principles as set forth by the US Department of Commerce concerning the transfer of personal data from the European Union.

We self-certify compliance with



If you have questions about this Privacy Statement or want to contact us regarding how we handle your data, please send an email to privacyquestions@truste.com or write to us at:

TRUSTe 55 2nd Street, 2nd Floor San Francisco, CA 94105

# How We Collect and Use Your Personally Identifying Information

### Watchdog Complaints

We encourage you to use TRUSTe's Watchdog Dispute Resolution process to report and resolve privacy complaints you may have concerning TRUSTe Sealholders or to report misuse of TRUSTe trademarks. If you choose to file a Watchdog complaint, we collect your name, email, and location. We also request you provide the details around your complaint. Any additional personally identifying information you provide on the Watchdog Complaint Form is optional. We will use this information to investigate your complaint and to send you an optional Watchdog Customer Satisfaction Survey once your complaint is resolved.

We will not share your name or contact information with the TRUSTe Sealholder that is the subject of your privacy complaint unless you give us permission to do so. Please be aware, however, that if we cannot share this information, then we may not be able to resolve your complaint.

#### TRUSTe Programs and Services

If you apply to become a TRUSTe Sealholder, we will use the personally identifying information you provide (e.g., your name, address, email address, company information and payment information) to follow up with you about your application and facilitate the certification process.

We also use this information to provide you with customer support and to communicate regularly with you. While providing you with customer support (including through the live chat feature on our website) we may also gather additional information from you. From time to time we will also offer you the opportunity to receive information about privacy-related products or services offered by our third-party partners. We will not share your personally identifying information with these third parties for their marketing purposes, unless we have your permission to do so.

We use information submitted through our Web site or collected through email or hard copy surveys to analyze the characteristics of our customers and improve our services. We will occasionally provide anonymized aggregated statistics about our Sealholders in reports made available to them, to third parties, or to the general public. These reports will not identify individual TRUSTe Sealholders.

If you wish to sign up for TRUSTe programs other than the Web Seal Program, or to simply obtain information about TRUSTe programs and services, we will collect your name, email address, phone number, and additional company information. We use this information to contact you about your request, to assist you in the application process or to follow up with you about the programs and services in which you have expressed an interest.

### TRUSTe Communications

If you sign up for TRUSTe newsletters, webinars, our online behavioral advertising notice opt-out reminder e-mails, or other communications or you want to contact us generally, we will collect your contact information to fulfill your request. To unsubscribe, follow the unsubscribe link that appears at the end of each communication, or go to our "Unsubscribe" page.

#### Other Information We Collect

### Consumer Opinion Surveys

We occasionally conduct online consumer surveys to learn about your views on important privacy issues. We do not collect personally identifying information in these surveys. We use the survey data for research and to improve our services.

#### Cookies

Cookies are very small text files that are stored on your computer when you visit certain web pages. We use cookies on our site to:

- help you navigate our website
- facilitate the sign up and login process for our services
- personalize your experience
- analyze which pages our site visitors visit
- measure advertising and promotional effectiveness

We also use cookies with our online behavioral advertising notice and choice program's opt-out tools to assist with your opt-out choices and to help us measure usage.

Please note that some cookies may be placed by a third party service provider who performs some of these functions for us.

#### Information Automatically Collected By Our Site

As is true of most Web sites, we gather Web server log file information automatically such as your IP address, browser type, referring/exit pages, and operating system. We use this information to administer our website, understand how visitors navigate through our Site and to enhance your experience while using our Site.

# How We Share Your Personally Identifying Information

We may provide your personally identifying information to companies that provide services to help us with our business activities such as web site analytics or offering customer service. These third parties are authorized to use your personally identifying information only as necessary to provide these services to us.

We may also disclose your personally identifying information

- as required by law such as to comply with a subpoena, or similar legal process
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or respond to a written government request
- if TRUSTe becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide

notice before personally identifying information becomes subject to a different privacy statement

to any other third party with your prior consent to do so

We will share your personally identifying information with third parties only in the ways that are described in this Privacy Statement. We do not otherwise sell your personally identifying information to third parties.

### Accessing and Updating your Personally Identifying Information

To review and update your personally identifying information to ensure it is accurate, contact us; or, if you are a TRUSTe customer, use our online tools.

TRUSTe will make commercially reasonable efforts to provide you reasonable access to any of your personally identifying information we maintain within 30 days of your access request. We provide this access so you can review it, make corrections or request deletion of your data. If we cannot honor your request within the 30-day period, we will tell you when we will provide access. In the unlikely event that we cannot provide you access to this information, we will explain why we cannot do so.

# Security

Providing security for the personally identifying information you submit via our Site is a priority for TRUSTe. We take appropriate security measures to protect against unauthorized access to; or unauthorized alteration, disclosure, or destruction; of your personally identifying information. We use Secure Socket Layer (SSL) to encrypt the transmission of data on the TRUSTe Sealholder application, payment and login pages. Please be aware, however, that no transmission of information via the Internet can be entirely secure. You should, therefore, always use caution when submitting personally identifying information online.

# Links to Other Web Sites

This Privacy Statement applies to TRUSTe Web services only. Our Site includes links to other Web sites. If you submit personally identifying information to any of those sites, your information is subject to their privacy statements. We encourage you to carefully read the privacy statement of any Web site you visit.

# **Changes to this Privacy Statement**

Please note that this Privacy Statement may change from time to time. If we change this privacy statement in ways that affect how we use your personally identifying information, we will advise you of choices you may have as a result of those changes. We will also post a notice on our home page that this Privacy Statement has changed.