

## Simparel Online Privacy Statement

Your privacy maintaining your trust is important to Simparel.

This Statement discloses the information practices for Simparel's and its affiliates' Web sites, including what type of information is gathered and tracked, how the information is used, and with whom the information is shared.



This Statement applies to Simparel Web sites that link to this Statement but does not apply to those Simparel Web sites that have their own Privacy Statement. Additionally, it does not apply to instances where we merely process data on behalf of clients for their benefit, such as when we act as a web hosting service provider.

From time to time, we may supplement this Statement with additional information relating to a particular interaction we have with you.

### Collection of Personal Information

You may choose to give us personal information directly in a variety of situations. For example, you may want to give us your name and contact information to communicate with you, to provide you with a subscription or a service, or to do business with us if you are a supplier or a business partner. If you tell us that you do not want us to use your information to make further contact with you beyond fulfilling your request, we will respect your wishes.

We may also collect information relating to your use of our Web sites through the use of various technologies. For example, when you visit our Web sites, we may log certain information that your browser sends us, such as your IP address, browser type and language, access time, and referring Web site addresses. We may also collect information about the pages you view within our sites and other actions you take while visiting us. In addition, we may also use such technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail. Collecting information in this manner allows us to collect statistics about our Web sites usage and effectiveness and personalize your experience while you are on our Web sites, as well as tailor our interactions with you. For details regarding the technologies we employ, see "Cookies, Web Beacon and Other Technologies" below.

From time to time, we may also collect information that pertains to you indirectly through other sources, such as list vendors. When we do so, we ask the vendors to confirm that the information was legally acquired by the third party and that we have the right to obtain it from them and use it.

The information that we collect, either directly or indirectly, may be combined to help us improve its overall accuracy and completeness and to help us better tailor our interactions with you.

### Use of Personal Information

The following paragraphs describe in more detail how Simparel may use your personal information:

#### Fulfilling your Transaction Request

If you request something from Simparel, for example, a product or service, a callback, or specific marketing materials, we will use the information you provide to fulfill your request. To help us do this, we may share information with others, for instance, Simparel's business partners, financial institutions, shipping companies, or postal or government authorities, such as Customs authorities, involved in fulfillment. In connection with a transaction, we may also contact you as part of our customer satisfaction surveys or for market research purposes.

#### Personalizing your Experience on our Web Sites

We may use information we collect about you to provide you with a personalized experience on our Web sites, such as providing you with content in which you may be interested and making navigation on our sites easier.

#### Marketing

The information you provide to Simparel, as well as the information we have collected about you indirectly, may be used by Simparel for marketing purposes. Before we do so, however, we will offer you the opportunity to choose whether or not to have your information used in this way. You may at any time choose not to receive marketing materials from us by following the unsubscribe instructions included in each e-mail you may receive, by indicating so when we call you, or by contacting us directly (please refer to "Privacy Questions and Access" below).

Some of our offerings may be co-branded, that is sponsored by both Simparel and third parties. If you sign up for these offerings, be aware that your information may also be collected by and shared with those third parties. We encourage you to familiarize yourself with their privacy policies to gain an understanding of the manner in which they will handle information about you.

### Recruitment

In connection with a job application or inquiry, whether advertised on a Simparel Web site or otherwise, you may provide us with information about yourself, such as a resume. We may use this information throughout Simparel in order to address your inquiry or consider you for employment purposes. Unless you tell us not to do so, we may keep the information for future consideration.

### Use of Information in the Social Computing Environment

Simparel provides social computing tools on some of its Web sites to enable online sharing and collaboration among members who have registered to use them. These include forums, webinars, blogs and other social media platforms.

When registering to use these tools, you will be asked to provide certain personal information. Registration information that is not automatically made available to other participants as part of your profile will be subject to and protected in accordance with this Privacy Statement.

Any other content you post, such as pictures, information, opinions, or any other type of personal information that you make available to other participants on these social platforms, is not subject to this Privacy Statement. Rather, such content is subject to the Terms of Use of those platforms, and any additional guidelines and privacy information provided in relation to their use. Please refer to them to better understand yours, Simparel's, and other parties' rights and obligations with regard to such content. You should be aware that the content you post on any such social computing platforms may be made broadly available to others inside and outside Simparel.

### Protect the Rights and Property of Simparel and Others

We may also use or share your information to protect the rights or property of Simparel, our business partners, suppliers, clients, or others when we have reasonable grounds to believe that such rights or property have been or could be affected. In addition, we reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights, or the rights of others, or to comply with a judicial proceeding, court order, or legal process served on our Web sites.

### Information for Business Partners

If you represent a Simparel business partner, you may visit the Simparel Web site intended specifically for Simparel business partners. We may use information provided on that site to administer and develop our business relationship with you, the business partner you represent, and Simparel business partners generally. For instance, this may involve using your information to send you details of Simparel business partner programs. It may also include sharing certain information with other business partners (subject to any confidentiality obligations that may exist), or Simparel customers or prospects. In connection with a particular transaction or program, we may also contact you as part of customer satisfaction surveys or for market research purposes.

### Sharing of Personal Information and International Transfers

Simparel is a global organization with business processes, management structures and technical systems that cross borders. As such, we may share information about you within Simparel and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Privacy Statement. Our Privacy Statement and our practices are designed to provide a globally consistent level of protection for personal information all over the world. This means that even in countries whose laws provide for less protection for your information, Simparel will still handle your information in the manner described here.

In some cases, Simparel uses suppliers located in various countries to collect, use, analyze, and otherwise process information on its behalf. It is Simparel's practice to require such suppliers to handle information in a manner consistent with Simparel's policies.

From time to time, we may disclose information that identifies you at an individual level and which we collected on our Web sites to other non-Simparel entities that are not acting as our suppliers, such as our business partners. Except as described in this Privacy Statement, we will only do so with your prior consent. We do not sell or lease such information however.

Circumstances may arise where, whether for strategic or other business reasons, Simparel decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. It is Simparel's practice to seek appropriate protection for information in these types of transactions.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your information to protect the rights or property of Simparel, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

### Information Security and Accuracy

We intend to protect your personal information and to maintain its accuracy. Simparel implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure.

### Cookies, Web Beacons and Other Technologies

As mentioned above, we collect information from your visits to our Web sites to help us gather statistics about our Web sites usage and effectiveness, personalize your experience on our sites, and tailor our interactions with you.

We do so through the use of various technologies, including one called "cookies". A cookie is a piece of data that a Web site can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure Web site usage and effectiveness and to allow for ease of navigation or use and as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience to a Web site by being associated with profile information or user preferences. You can set your browser in most instances to notify you before you receive a cookie, giving you the chance to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Since cookies allow you to take advantage of some of our Web sites' features, we recommend that you leave them turned on. If you block or otherwise reject our cookies, you will not be able, for instance, to add items to your shopping cart, proceed to checkout, or use any Web site services that require you to sign in.

We may use Web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on.

Some of our business partners set Web beacons and cookies on our site. We have no access or control of these third party tracking technologies.

### Online Advertising

Simparel does not deliver third party online advertisements on our Web sites but we advertise our products and services on others' Web sites. We may collaborate with Web site operators as well as network advertisers to do so. Please familiarize yourself with those Web site operators' or network advertisers' privacy policies to understand their practices relating to advertising, including what type of information they may collect about your Internet usage. Simparel does not provide any information relating to your usage of the Simparel Web site to Web site operators or network advertisers.

### Links to non-Simparel Web sites

Simparel Web sites may contain links to non-Simparel Web sites that are not affiliated with Simparel. Simparel is not responsible for the privacy practices or the content of those other Web sites.

### Notification of Changes

We will post a notice for 30 days at the top of this page notifying users when this Privacy Statement is updated or modified in a material way. If we are going to use your personal information in a manner different from that stated at the time of collection, we will notify you, and you will have a choice as to whether or not we can use your personal information in such a way.

### Privacy Questions and Access

If you have a question about this Privacy Statement or Simparel's handling of your information, you can send an email to [info@simparel.com](mailto:info@simparel.com). You can also contact us at:

Simparel Headquarters  
53 W. 36th Street  
11th Floor  
New York, NY 10018

In certain cases, you may have the ability to view or edit your personal information online. In the event your information is not accessible online, and you wish to obtain a copy of particular information you provided to Simparel, or if you become aware the information is incorrect and you would like us to correct it, contact us.

Before Simparel is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will contact you within 30 days of your request.

If you have questions or concerns regarding our Privacy Statement, you should contact Simparel directly

If you no longer wish to receive marketing e-mails from Simparel, please send an e-mail to <mailto:info@simparel.com> or follow the unsubscribe instructions included in each marketing email.