



## **LIGHT DEGREE LTD**

### **PRIVACY POLICY**

Your privacy is important to us. Light Degree has created this Privacy Policy to let you know what information we collect when you visit our Light Degree CRM or other sites, why we collect it and how it is used.

In Part II of this policy, the term you refers to the subscriber (Customer) to our Light Degree CRM or other sites accessed using our software service; in Part I of this policy, the term you refers to all Users of the Light Degree CRM service (Users). The terms Light Degree, and we refer to Light Degree Ltd and its subsidiaries and affiliates. This Privacy Policy is governed by our Terms of Service. By using this web site, you consent to the data practices described in this policy.

Personally Identifiable Information means any information that may be used to identify an individual, including, but not limited to, a first and last name, home or other physical address, email address, phone number, or other contact information, whether at work or at home.

### **WHAT IS LIGHT DEGREE?**

Light Degree is a software developer and software service provider. Light Degree is committed to its policy of protecting the privacy and confidential information of our Users, as described in Part II of this policy. We also protect the privacy of Users as described in Part I of this policy. Part II of our Privacy Policy applies only to our Users, who are using our Light Degree CRM. Credit card details will be handled securely to ensure confidentiality. SSL encryption is employed to ensure sensitive data is protected.

### **PART 1: USERS**

Light Degree provides software as a service only. Our Customers (as that term is defined in the Terms of Service) use our service to manage and administrate their business. Users may be clients, employees, suppliers, etc. of our Customer. Light Degree acts as a Data Processor (a company that processes Personally Identifiable Information on behalf of a Data Controller) and each Light Degree Customer acts as a Data Controller (a company that determines the purposes for which and the means by which the Personally Identifiable Information is processed). To process information means to carry out an operation or set of operations on the information, such as collecting, recording, storing, disclosing, or organizing it.

Information that Users provide to Customers passes through our service and resides on our servers. That information may be stored and processed in the United Kingdom or any other country in which Light Degree or its affiliates, subsidiaries or agents maintain facilities.

As a Data Processor, Light Degree will only process Personally Identifiable Information of Users pursuant to the instructions of the applicable Customer. Light Degree may use the services of third -party Data Processors to process Personally Identifiable Information in accordance with purposes identified for such information by the applicable Customer.

Except as provided in Part I of this Privacy Policy, Light Degree will not intentionally transfer or provide access to Personally Identifiable information of Users to any person without express instructions from the applicable User.

Users should refer to the Customer or its website to understand the privacy practices that apply to the information that the Customer is collecting. Light Degree does not review, comment upon, or monitor its Customers compliance with their respective privacy policies. Light Degree is not responsible to Users for the privacy practices of Customers. Users who provide Customers with data and other information do so at their own risk. Users should also contact the Customers concerning their ability to access and make changes to information they have provided to the User.

Our Terms of Use require that, prior to sending information to a user, a Customer must have an ongoing business or personal relationship with a User, or the Customer must have obtained the prior consent of a User to send emails to the User through our site. Our Terms of Service require the Customer who is sending information to take full responsibility for its subject matter and contents. Light Degree does not initiate communications with Users of our Customers. We rely on our Customers to assume responsibility for all communications to and from their Users, including the protection of information they receive from Users.

Customers are responsible for informing Users about the purpose for which Personally Identifiable Information is collected and used, for protecting that information once it has been collected, and for providing clear direction on further disclosure or non disclosure of the information. Customers are responsible for providing Users the opportunity to opt out of receiving communications from the Customer through our service.

## **USE OF COOKIES**

When a User uses the Light Degree site to send information, our servers (which may be hosted by a third-party service provider) may collect information indirectly and automatically (through, for example, the use of cookies or your IP address) about your activities on the site. We use this browsing information, in non-personally identifiable form, for internal purposes such as to help understand how the site is being used and to improve it, and for systems administration purposes. Cookies are small pieces of information stored on a User's hard drive, not on our site. Cookies allow us to better understand how Users use the site, which in turn helps us focus our resources on improvements to the site. We use session cookies, which expire when the browser window is closed, and persistent cookies to keep track of which information a particular User has sent. A User is always free to decline our cookies if their browser permits, but in that case, the site may not operate properly. An IP address is a number that is automatically assigned to a computer when it is used on a network like the Internet. In some cases the computer's IP address stays the same from browser session to browser session; but, for computers connecting to the Internet via consumer Internet access providers, the IP address generally varies from session to session.

In some cases, we enable Customers to use unique identifiers in email messages, which enable them to determine which emails have generated responses. This allows Users to gauge the effectiveness of certain communications and to exclude those persons who have already sent information in response to a certain message or from duplicate messages. Light Degree uses industry-standard security measures to protect the integrity and confidentiality of Personally Identifiable Information it processes on behalf of Users, including, in appropriate circumstances, the use of firewalls and restricted access. Light Degree limits access to Personally Identifiable Information to those persons in the Light

Degree organization who have a business need to process such Personally Identifiable Information. However, no company, including Light Degree, can fully eliminate the security risks associated with such information. Due to factors beyond Light Degree control, Light Degree cannot ensure that Personally Identifiable Information will not be disclosed to third parties. For example, Light Degree may become legally obligated to disclose such information, or, despite precautions, third parties may circumvent security measures to intercept or access such information.

If another company acquires Light Degree or substantially all of its assets, that company will (a) will possess the Personally Identifiable Information of Users held by Light Degree, and (b) assume the rights and obligations regarding such information described in this Privacy Policy.

Any questions, comments, or complaints about the data practices (including without limitation compliance with the data privacy principles of notice, choice, onward transfer, access, security, data integrity, or enforcement) of a Customer should be directed to that Customer.

## **PART II: CUSTOMERS**

What Personally Identifiable Information does Light Degree collect and what does Light Degree do with it Upon registration, we ask our Users to provide us with certain Personally Identifiable Information such as their name, country of residence and email address. We use this information to establish individual log-in accounts, protected by a password that the User selects. In addition, we use the email address supplied by the User in the registration process to confirm registration, and to send notices and updates to the User concerning the services and the site.

Light Degree also automatically receives and records information on our server logs from your browser, including your IP address, cookie information and the page you request. This information helps us to make the site better and more user-friendly. We also collect, with either cookies or web logs, a Users IP address and login times that are identified by individual user. Finally, we collect the information and reports that you have either, requested, initiated or otherwise participated in.

## **NOTE TO PARENTS AND MINORS**

We are committed to complying fully with the Children's Online Privacy Protection Act of 1998, as amended. We urge minors to check with their parents before entering information on this or any other web site.

## **DOES LIGHT DEGREE DISCLOSE MY PERSONALLY IDENTIFIABLE INFORMATION OR OTHER INFORMATION I INPUT INTO THE SITE TO ANYONE?**

We recognize that, in addition to your Personally Identifiable Information, you may also enter other information into the Light Degree site. Such other information may include email lists, information about your Users, and other data useful to you. We do not disclose your Personally Identifiable Information or such other information to other Customers, Users or any other third parties, unless you expressly agree to such disclosure or it is required by law, and except for such information that may be necessary for us to share with our trusted internal and third-party service providers for the operation of our business and the tracking and management of the information we collect from you and other Users.

We may also disclose Personally Identifiable Information or other information if required to do so by law or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process served on Light Degree or this site; (2)

protect and defend the rights or property of Light Degree; or (3) act in urgent circumstances to protect the personal safety of users of Light Degree, its web sites or the public. If Light Degree (or our Light Degree service) should ever file for bankruptcy or merge with another company or entity, we may sell the information you provide to us on this site to a third party or share your information with any company with whom we merge (and they in turn will be subject to this Privacy Policy).

Please note that if we believe that you have breached the Terms of Use for use of this site, especially with regard to our strict ban on transmitting, publishing or distributing pornographic, obscene, offensive, threatening, harassing, libellous, hate-oriented, harmful, defamatory, racist, illegal or otherwise objectionable materials or content, we will report such conduct to the appropriate authorities and turn over any and all information, including Personally Identifiable Information and other information you have input into the site, to appropriate law enforcement persons or entities.

### **HOW DOES LIGHT DEGREE STORE MY PERSONALLY IDENTIFIABLE INFORMATION? WHAT ARE THE SECURITY MEASURES?**

Light Degree stores Personally Identifiable Information and other personal information of Users in databases protected by passwords as well as database and network firewalls to prevent the loss, misuse or alteration of personal information. We use modern security technology to protect the personal information submitted to us, both during transmission and once we receive it. Unfortunately, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we are vigilant in protecting the personal information that you transmit to us, we cannot guarantee its absolute security.

### **CAN I EDIT OR DELETE MY PERSONALLY IDENTIFIABLE INFORMATION ON THIS SITE?**

By accessing your account through the Account Information page on our site, you may edit your Personally Identifiable Information. You can also request that we remove your registration information from our current database.

### **DOES LIGHT DEGREE DO ANYTHING WITH INFORMATION RECEIVED OR STORED?**

No! We will not use or disclose any information without a Users permission through an email or other written authorization, except as provided above. However, Users may access their information/reports/ other data through their individual accounts protected by a password they have selected.

### **INTERNATIONAL TRANSFERS**

Personally Identifiable Information collected on this site may be stored and processed in the United Kingdom or any other country in which Light Degree or its affiliates, subsidiaries or agents maintain facilities, and by using this site, you consent to any such transfer of information outside of your country. Our Privacy Policy applies to your Personally Identifiable Information wherever we store or process it.

### **THIRD-PARTY SITES**

Please be aware that some of the Web sites you may choose to link to from our site may collect Personally Identifiable Information and other information about you. The practices of those Web sites concerning the Personally Identifiable Information or other information they collect from you are not covered by this Privacy Policy.

### **CHANGES TO THIS PRIVACY POLICY**

If we change this policy, we will publish changes on this site before those changes will take

effect. We will post a notice on our site directing you to the modified policy. Please review this site periodically to keep informed of our most current privacy policy. As always, if you do not agree with our Privacy Policy or any changes to it, you should cease using this site. If you continue to use this site after we have posted a notice that changes have been made to this policy, you will be deemed to have accepted those changes.

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