

PRIVACY POLICY STATEMENT

Adverttek, Inc. (*Adverttek*) respects individual privacy and values the confidence of its business partners and their customers. Not only does Adverttek strive to collect, use and disclose Personal Information in a manner consistent with the laws of the countries in which it does business, but it also has a tradition of upholding the highest ethical standards in its business practices.

For services that require the inclusion of Protected Health Information in the United States, Adverttek is committed to complying with the Standards for Privacy and Security of Individually Identifiable Health Information (the “Privacy & Security Regulations”) promulgated under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

For services that require transfer of Personal Information between the European Economic Area (EEA) (which includes the member states of the European Union (EU)) and the United States, Adverttek follows a Safe Harbor Privacy Policy (the *Policy*) that sets forth the following Safe Harbor privacy principles (the *Principles*).

Notice. When Adverttek collects and uses Personal Information, it will inform the individuals to whom the information pertains about the purposes of such collection and usage, how to contact Adverttek with any inquiries or complaints, the types of third parties to which Adverttek discloses the information, and the choices and means Adverttek offers individuals for limiting its use and disclosure. This notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Adverttek or as soon thereafter as is practicable, but in any event before Adverttek uses their Personal Information for a purpose other than that for which it was originally collected or processed by the transferring organization or discloses it for the first time to a third party.

Choice. Adverttek will offer individuals the opportunity to choose (opt out) whether their Personal Information is (a) to be disclosed to a third party or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual. Individuals will be provided with clear and conspicuous, readily available, and affordable mechanisms to choose. For Sensitive Information, individuals will be given affirmative or explicit (opt in) choice if the information is to be disclosed to a third party or used for a purpose other than those for which it was originally collected or subsequently authorized by the individual through the exercise of opt in choice. In any case, Adverttek will treat as sensitive any information received from a third party where the third party treats and identifies it as sensitive.

Onward Transfer. To disclose Personal Information to a third party, Adverttek will apply the Notice and Choice Principles. Where Adverttek wishes to transfer information to a third party that is acting as an Agent, it may do so if it first either ascertains that the third party subscribes to the Principles or is subject to the European Commission's Directive on Data Protection or another adequacy finding or enters into a written agreement with such third party requiring that the third party provide at least the same level of privacy protection as is required by the relevant Principles. If Adverttek complies with these requirements, it will not be held responsible (unless Adverttek agrees otherwise) when a third party to which it transfers such information processes it in a way contrary to any restrictions or representations, unless Adverttek knew or should have known the third party would process it in such a contrary way and Adverttek has not taken reasonable steps to prevent or stop such processing.

Security. Adverttek will take reasonable precautions to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Data Integrity. Consistent with the Principles, Personal Information will only be used if it is relevant for such purposes. Adverttek will not process Personal Information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual. To the extent necessary for those purposes, Adverttek will take reasonable steps to ensure that Personal Information is reliable for its intended use, accurate, complete, and current.

Access. Individuals can access Personal Information about them that Adverttek holds and will be able to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

Enforcement. Adverttek will conduct compliance audits of its relevant privacy practices on a six-month basis. The audits will be conducted by the Privacy Officer, or his designee, and are designed to verify adherence to this Policy. Any employee that Adverttek determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

Dispute Resolution. Any questions or concerns regarding the use or disclosure of Personal Information should be directed to Adverttek, attention Privacy Officer, at the address given below. Any individual presenting a question or concern about Personal Information must submit a written dispute resolution request providing the details of the issue in order for the Privacy Officer to effectively evaluate the issue. The Privacy Officer will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy. For complaints that cannot be

resolved between Adverttek and the complainant, Adverttek elects to participate in the dispute resolution procedures of the home country of the complainant and will cooperate with the European data protection authorities to investigate and resolve disputes pursuant to the Principles. Adverttek will comply with any advice given by the competent European data protection authority where the European data protection authority takes the view that Adverttek needs to take specific action to comply with the Principles, including remedial or compensatory measures for the benefit of individuals affected by any non-compliance with the Principles. Adverttek will provide the competent European data protection authority with written confirmation that such action has been taken.

Limitation on Application of Principles

Adherence by Adverttek to these Principles may be limited (a) to the extent required to respond to a legal or ethical obligation (for example a national security requirement); and (b) to the extent expressly permitted or required by an applicable law, rule or regulation.

Public Website Non-Personal Information

Adverttek collects Non-Personal Information (information that is not traceable back to any individual), via a cookie, about your use of our public website. The Non-Personal Information collected is for the general purpose of keeping track of web site usage patterns, maintenance, and statistical analysis.

Contact Information

Questions or comments regarding this Policy should be submitted to our Privacy Officer by mail as follows:

Adverttek, Inc.
Privacy Officer
PO Box 991335
Louisville, Kentucky 40269-1335
Email: info@adverttek.net
Telephone: (502) 671-1007

Changes to Data Privacy Policy

This Policy may be amended from time to time, consistent with the requirements of the Principles. A notice will be posted for 60 days whenever this Policy is changed in a material way.

Definitions

Agent means any person or third party that collects or uses Personal Information under the instructions of, and solely for, Adverttek or to whom Adverttek discloses Personal Information for use on Adverttek's behalf.

Personal Information means any information relating to an identified or identifiable natural person whose personal data are protected by the EU Privacy Directive, as implemented by EU member states. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to that person's physical, physiological, mental, economic, cultural or social identity. Personal Information does not encompass personal data about individuals whose personal data are not protected by the laws of EU member states.

Non-Personal Information means any information that is not traceable back to any individual.

Sensitive Information is defined as Personal Information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual.

Privacy Officer means the individual responsible for internal audit of processes and procedures to safeguard Personal Information and responsible for ensuring that transfers are consistent with applicable law.