

# Privacy Statement Effective as of January 1, 2009

Digital Online Technologies, Inc. (d.b.a., "CredentialSmart" or the "Company") is committed to protecting the privacy of your information. This Privacy Statement describes CredentialSmart's information practices

## 1. Web Sites Covered

This Privacy Statement covers the information practices of Web sites that link to this Privacy Statement including but not limited to: [www.credentialSMART.net](http://www.credentialSMART.net); [www.privilegesmart.net](http://www.privilegesmart.net); [www.privilegexchange.net](http://www.privilegexchange.net); [www.emergencycredentialing.net](http://www.emergencycredentialing.net); [www.disastercredentialing.net](http://www.disastercredentialing.net). CredentialSmart is an online marketplace for Web applications that run on the Company's servers and url's. Applications may be posted by CredentialSmart and may include interfaces or software from third parties. When applications are posted by CredentialSmart, this Privacy Statement applies. When applications are posted by linked to or interfaced with third parties, the privacy statement of the third party applies, and this Privacy Statement does not apply.

CredentialSmart's Web sites may contain links to other Web sites and/or Web services. CredentialSmart is not responsible for the information practices or the content of such other Web sites or Web services. The Company encourages you to review the privacy statements of other Web sites or Web services to understand their information practices.

## 2. Personal Information Collected

CredentialSmart offers a variety of services that are collectively referred to as the "Service." CredentialSmart collects information from individuals who visit the Company's Web sites ("Visitors") and individuals who register to use the Service ("Customers").

When expressing an interest in obtaining additional information about the Service or registering to use the Service, CredentialSmart requires you to provide the Company with contact information, such as name, company name, address, phone number, and email address ("Required Contact Information"). When purchasing the Service, CredentialSmart requires you to provide the Company with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Service ("Billing Information"). CredentialSmart may also ask you to provide additional information, such as company annual revenues, number of employees, or industry ("Optional Information"). Required Contact Information, Billing Information, and Optional Information are referred to collectively as "Data About CredentialSmart Customers." Personal information or credentialing data entered into any of the Services is collectively referred to as "Information". Information is covered by the appropriate License or User Agreement and may not be sold or shared with any third party unless specifically authorized in writing by the respective User Agreement. Please see section 9, Customer Data in this Privacy Statement for information relating to the Information.

As you navigate the Company's Web sites, CredentialSmart may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons ("Web Site Navigational Information"). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Company's Web sites (such as the Web pages viewed and the links clicked). For additional information about CredentialSmart's collection of Web Site Navigational Information, please click [here](#).

## 3. Use of Information Collected

The Company uses Data About CredentialSmart Customers to perform the services requested. For example, if you fill out a "Contact Me" Web form, the Company will use the information provided to contact you about your interest in the Service.

The Company may also use Data About CredentialSmart Customers for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in CredentialSmart, the Service, and to send you information regarding the Company and its partners, such as information about promotions or events.

CredentialSmart uses credit card information solely to check the financial qualifications of prospective Customers and to collect payment for the Service.

CredentialSmart uses Web Site Navigational Information to operate and improve the Company's Web sites. The Company may also use Web Site Navigational Information in combination with Data About CredentialSmart Customers to provide personalized information about the Company.

For additional information about the Company's use of Web Site Navigational Information, please click [here](#).

## 4. Web Site Navigational Information

CredentialSmart uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Web sites ("Web Site Navigational Information"). This section describes the types of Web Site Navigational Information the Company may collect and how the Company may use this information.

### Cookies

CredentialSmart uses cookies to make interactions with the Company's Web sites easy and meaningful. When you visit one of the Company's Web sites, CredentialSmart's servers send a cookie to your computer. Standing alone, cookies do not personally identify you. They merely recognize your Web browser.

There are two types of cookies: session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer.

If you have chosen to identify yourself to CredentialSmart, the Company uses session cookies containing encrypted information to allow the Company to uniquely identify you. Each time you log into the Service, a session cookie containing an encrypted, unique identifier that is tied to your account is placed your browser. These session cookies allow the Company to uniquely identify you when you are logged into the Service and to process your online transactions and requests. Session cookies are required to use the Service.

CredentialSmart does not currently use persistent cookies but reserves the right to use them. If used the persistent cookies would be used in that only the Company can read and use to identify browsers that have previously visited the Company's Web sites. When you purchase the Service or provide the Company with personal information, a unique identifier is assigned you. This unique identifier is associated with a persistent cookie that the Company places on your Web browser. The Company is especially careful about the security and confidentiality of the information stored in persistent cookies. For example, the Company will not store account numbers or passwords in persistent cookies. If you disable your Web browser's ability to accept cookies, you will be able to navigate the Company's Web sites, but you will not be able to successfully use the Service.

CredentialSmart may use information from session and persistent cookies in combination with Data About CredentialSmart Customers to provide you with information about the Company and the Service.

#### **Web Beacons**

CredentialSmart uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Web sites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site tied to the Web beacon, and a description of a Web site tied to the Web beacon. For example, CredentialSmart may place Web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company's Web sites. CredentialSmart uses Web beacons to operate and improve the Company's Web sites and email communications. CredentialSmart may use information from Web beacons in combination with Data About CredentialSmart Customers to provide you with information about the Company and the Service.

#### **IP Addresses**

When you visit CredentialSmart's Web sites, the Company may collect your Internet Protocol ("IP") addresses to track and aggregate non-personally identifiable information. For example, CredentialSmart uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company's Web sites.

CredentialSmart may also collect IP addresses from Customers when they log into the Service as part of the Company's "Identity Confirmation" and "IP Range Restrictions" security features.

#### **Third Party Cookies**

CredentialSmart does not currently utilize third party cookies on our servers that host Services.

Third party cookies may be utilized on our marketing sites such as [www.credentialSMART.com](http://www.credentialSMART.com). On our marketing sites, from time-to-time, CredentialSmart may engage third parties to track and analyze non-personally identifiable usage and volume statistical information from individuals who visit the Company's Web sites. CredentialSmart may also use other third-party cookies to track the performance of Company advertisements. The information provided to third parties does not include personal information, but this information may be re-associated with personal information after the Company receives it. This Privacy Statement does not cover the use of third party cookies.

## **5. Public Forums, Refer a Friend, and Customer Testimonials**

CredentialSmart may provide bulletin boards, blogs, or chat rooms on the Company's Web sites. Any personally identifiable information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. CredentialSmart is not responsible for the personally identifiable information you choose to submit in these forums.

Customers and Visitors may elect to use the Company's referral service to inform friends about the Company's Web sites. When using the referral service, the Company requests the friend's name and email address. CredentialSmart will automatically send the friend a one-time email inviting him or her to visit the Company's Web sites. CredentialSmart does not store this information.

CredentialSmart posts a list of Customers and testimonials on the Company's Web sites that contain information such as Customer names and titles. CredentialSmart obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## **6. Sharing of Information Collected**

CredentialSmart may share Data About CredentialSmart Customers with the Company's agents so that these agents can contact Customers and Visitors who have provided contact information on our behalf. CredentialSmart may also share Data About CredentialSmart Customers with the Company's agents to ensure the quality of information provided. CredentialSmart does not share, sell, rent, or trade personally identifiable information with third parties for their promotional purposes. CredentialSmart does not share, sell, rent, or trade Information with any third parties.

CredentialSmart uses a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

CredentialSmart reserves the right to disclose personally identifiable information of the Company's Customers or Visitors if required by law or if the Company reasonably believes that disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

## **7. Communications Preferences**

CredentialSmart offers Customers and Visitors who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of the Company's marketing emails. Customers cannot opt out of receiving transactional emails related to their account with CredentialSmart or the Service.

## **8. Correcting and Updating Your Information**

Customers may update or change their registration information by editing their user or organization record. To update a user profile, please login to <http://www.CredentialSmart.net> with your CredentialSmart username and password and click "Account." To update an organization's information, please login to <http://www.CredentialSmart.net> with your CredentialSmart username and password and select "Contact." To update Billing Information or have your registration information deleted, please email [support@CredentialSmart.net](mailto:support@CredentialSmart.net). To discontinue your

account and to have information you maintained in the Service returned to you, please email support@CredentialSmart. Requests to access, change, or delete your information will be handled within 30 days.

## 9. Customer Data

CredentialSmart Customers use the Service to host data and Information ("Customer Data"). CredentialSmart will not review, share, distribute, or reference any such Customer Data except as provided in the CredentialSmart License Agreement or User Agreement (whichever is applicable), or as may be required by law. Individual records of Customer Data may be viewed or accessed only for the purpose of resolving a problem, support issues, or suspected violation of the CredentialSmart License Agreement or User Agreement, or as may be required by law. Customers are responsible for maintaining the security and confidentiality of their CredentialSmart usernames and passwords.

## 10. Security

CredentialSmart uses robust security measures to protect Customer Data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of Customer Data. When the Service is accessed using Internet Explorer version 6.0 or later, Firefox version 2.0 or later, or Safari version 3.0 or later, Secure Socket Layer ("SSL") technology protects Customer Data using both server authentication and data encryption. These technologies help ensure that Customer Data is safe, secure, and only available to the Customer to whom the information belongs and those to whom the Customer has granted access. CredentialSmart also implements an advanced security method based on dynamic data and encoded session identifications, and the Company hosts its Web sites in a secure server environment that uses firewalls and other advanced technology to prevent interference or access from outside intruders. CredentialSmart also offers enhanced security features within the Service that permit Customers to configure security settings to the level they deem necessary.

Because the Company uses the Service to maintain Data About CredentialSmart Customers, this information is secured in the same manner as described above for Customer Data.

## 11. Changes to this Privacy Statement

CredentialSmart reserves the right to change this Privacy Statement. CredentialSmart will provide notification of the material changes to this Privacy Statement through the Company's Web sites at least thirty (30) business days prior to the change taking effect.

## 12. Contacting Us

Questions regarding this Privacy Statement or the information practices of the Company's Web sites should be directed to CredentialSmart Privacy by mailing CredentialSmart Privacy, 1007 Church Street, Suite 301, EVANSTON, Illinois 60201.