

## Privacy Policy - August 2010

### I. Our Commitment to Privacy

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HealthActCHQ™ Inc. (HACHQ) meets existing international standards for protecting confidentiality for the personal information provided at our website. Our relationships with clinicians and researchers are built on the integrity and objectivity of our services and our respect for privacy. We understand that business, and credit card information is personal and that information provided for licensing for research is confidential.

The following Privacy Policy is designed to assist you in understanding how we collect, use, and safeguard any information that you provide. All of our policies and systems are designed to respect your choices on how your information is processed and stored.

### II. Scope of this Privacy Policy

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This Privacy Policy applies to any and all personally identifiable information we collect from you to apply for licensure, to obtain licensure, and to process credit card and other payments.

### III. Information We Collect

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Our web servers automatically capture the IP address of either your computer or Internet Service Provider, the IP address of the web page from which you enter our website, the pages you visit on our website, and the amount of time you spend there.

### IV. Information You Choose to Provide

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#### A. Your Personal Information

Any personally identifiable information you provide to us will be used only to provide the product, service, or information you have directly requested. Your personally identifiable information, including your name, company, email address, will not be sold, rented, licensed, or otherwise shared with third parties, unless you specifically consent to let us do so. HACHQ has never historically made such a request of any parties.

#### B. Email Addresses

Your email address will be held in the strictest confidence and will not be disclosed to anyone. We will not add your email address to any distribution list of any third party.

#### C. Emails and Newsletters

We may offer email newsletters and send notifications via email such as reminders to renew a license, new surveys available, etc., and will be sent only to those individuals who have registered and/or received a paid license from HACHQ.

#### D. Credit Card information

If you choose to purchase products or services from us you will need to give personal information and authorization to obtain information from, and supply information to, various credit card services. For example, you may need to provide the following information:

- Name
- Mailing address
- Email address
- Credit Card Number
- Credit Card Authentication Codes (CVV2); these 3 or 4-digit codes may be required for processing
- Home and business phone numbers

Credit card information is not kept on our servers. Credit card information is retained only long enough to complete any transaction and then the information is deleted.

#### **E. Cookies, web beacons, and web bugs**

When you visit our website, we may use temporary cookies to enhance your visit. Cookies that we use are small computer files that track non-personal information - such as what areas of our website you appear to use the most. Our cookies are immediately removed from your computer once you end your session at our website. We do not store permanent cookies of any type on your computer. We do not use web beacons or web bugs of any kind.

#### **F. Propriety or Confidential Information in Communications to HealthActCHQ**

This Privacy Policy does not protect any information (including personal or business information, inventions, or ideas) you include in any email or phone communications to us. Please feel free to contact us with feedback, questions, or suggestions with this in mind.

### **V. Security/How We Protect Your Information**

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#### **A. Information Security**

The security and trustworthiness of our website has been authenticated by Trustwave, which provides Secure Socket Layer (SSL) technology using 128-bit encryption. This technology allows us to encrypt information so that it cannot be accessed or modified by a third party while it is in transition to our servers or once it is in our database.

#### **B. Evaluation of Our Information Protection Services**

The security of the information used in our programs is of the utmost importance to us. Our data storage and distribution methods are in compliance with the Health Insurance Portability and Accountability Act (HIPAA), and our internal protocols include researching the latest security technology available and reassessing our information protection systems.

### **VI. Your Consent**

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By using our website, you consent to our collection and use of your personal information as described in this Privacy Policy. If you do not agree with the terms, then do not register at HACHQ, or purchase survey licenses from our website.

If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it, and under what circumstances it may be disclosed.

## VII. Disclosure of Your Information

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We may disclose personal information to our affiliate and subsidiary companies in order to provide these services. This Privacy Policy will apply to these affiliates and subsidiaries unless a new policy is made between you and such affiliate or subsidiary.

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (i) permitted or required by law; (ii) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or (iii) investigating fraud which has already taken place. The information is not provided to these agencies or companies for marketing purposes.

## VIII. Notifications of Changes to this Privacy Policy

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From time to time, or in the event that changes are made to this policy, we will notify each registered individual, and request that you review and accept the new terms. If after you have received notification of these changes, you continue to use our website, it is understood that you agree to any new terms - as posted. The date of the most recent revision is posted at the top of this Privacy Policy.

**By using our website, you agree to the terms of this Privacy Policy in full.**