

# **SVIEW USA, LLC PRIVACY POLICY**

**Effective Date:** This Privacy Policy is effective and was last updated as of February 24, 2011.

## **Our Commitment to Your Privacy**

Thank you for visiting the SView USA, LLC website located at [www.sview.com](http://www.sview.com) (the “**Website**”). This Privacy Policy describes:

- The categories of personal information we collect via the Website and the online services provided through the Website;
- how we use such personal information;
- the types of third parties with whom we share such personal information;
- how you can review and request changes to such information; and

**Please note that we will not use or disclose your Personal Information to any third parties other than as provided in this Privacy Policy.**

If you have any questions regarding this Privacy Policy or our information collection and use practices, please contact us using the information in the “**Contact Us**” section below.

## **Your California Privacy Rights**

This Privacy Policy applies to all of our customers who use the Website and our Service (the “**Publishers**”) to send messages and to those consumers who have previously consented to receiving messages from the Publishers (the “**Recipients**”), including residents of California. If we decide to make material changes to our Privacy Policy, we will notify you by sending a notice to the email address that you have provided in connection with your SView account and/or our Website by placing a notice on the Website. You should periodically check the Website for such notices. Regardless of any changes we make to our Privacy Policy, we will only use your Personal Information in accordance with the version of the Privacy Policy in place at the time you provided your information, unless you later give your express consent for us to do otherwise.

## **Categories of Information We Collect**

We may collect information about you in one of two ways:

- **User Accounts**

In order for us to provide you with our **Service** (as it is defined in our Publisher Agreement), you will need to apply and be accepted for a publisher account with our Website (your “**User Account**”). In order to apply for a User Account, you must provide the following information:

- your name
- your e-mail address (which must be a functioning address)
- a username (same as your email address) and password that will be associated with your User Account
- your physical mailing address
- your bank account or credit card information if you elect to become an electronically billed monthly subscriber to our Service

We refer to these categories of information you voluntarily provide to us as “**Personal Information**” in this Privacy Policy. Further information about the creation and use of User Accounts is provided in our **Publisher Agreement**.

- **User Distribution Lists**

As part of our Services, our software archives distribution lists input by our Publishers in order to enable them to send messages to Recipients. This information is comprised of (1) each Recipient’s mobile phone number and (2) optionally may also include the recipient’s name, company name, the mailing address and email address of each Recipient (the “**Recipient Information**”).

## **How We Use the Information Collected**

The Personal Information and Recipient Information we collect will be used by us as follows:

- to register and service your User Account;
- in order to contact Publishers to respond to their questions or requests or to provide them with technical support;
- to provide Publishers with information regarding changes to the Website which may affect their User Accounts, use of the Website, and/or the Service available through the Website;
- for our internal records, tracking and business purposes; and
- to resolve administrative or technical issues involving either the Website or our Service.

## **When We Disclose the Information Collected**

The Personal Information and Recipient Information we collect will be disclosed by us:

- to service providers performing services on our behalf;
- to comply with any applicable law, regulation, legal process or governmental request, to enforce our rights or to protect the safety and security of our Website, our Service or other users; and
- in the event SView undergoes a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, we may transfer your Personal Information to the successor organization in such transaction. If material changes to our privacy practices will occur as a result of the business transition, we will attempt to notify you via email and will post a notice on the Website alerting you to the business transition prior to transferring your Personal Information.

## **How to Access and Update Your Personal Information**

If you have created a User Account, you may review and make changes to certain of your Personal Information by logging into your User Account and updating your User Account profile. Alternatively, you may contact us to request that we make changes to your Personal Information. If you amend any Personal Information attached to your User Account or contact us and request us to do so, we will amend your Personal Information within a reasonable time after your request.

Please note that even if you change your Personal Information in our active databases or request us to do so, we will continue to have the right to maintain all Personal Information collected from you through the Website (including Personal Information which is not longer in active use due to its amendment in accordance with this Section) in our archives and to use and disclose such Personal Information as we deem necessary to comply with any applicable law, regulation, legal process or governmental request, to enforce our rights or to protect the safety and security of our Website, our Service or other users.

## **Our Policies Concerning Children**

This Website is not intended for children and we do not knowingly collect any Personal Information from children. If you are a Publisher we ask that you do not provide us with any Recipient Information for children under the age of 13. In the event that we learn that we have inadvertently gathered Personal Information from children under the age of 13, we will use reasonable efforts to erase such information from our records.

## **Security of Your Information**

We implement reasonable administrative, technical and physical security measures to protect the security of your information both online and offline, and we are committed to the protection of customer information. In general, our business practices limit employee access to confidential information to those employees we reasonably believe need such information to do their jobs.

Your User Account information is protected by the password you use to access your online account. It is important that you protect and maintain the security of your User Account and that you immediately notify us of any unauthorized use of your User Account. If you forget your password, you may email us at [support@sview.com](mailto:support@sview.com) to request a new password upon our verification of other information we maintain about you.

While we take reasonable precautions against possible security breaches of the Website and our customer databases and records, no website or Internet transmission is completely secure, and we cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. We urge you to take steps to keep your Personal Information safe (including your User Account password), and log out of your User Account after use.

## **Contact Us**

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please send an email to: [info@sview.com](mailto:info@sview.com) or contact us at:

SView USA, LLC  
505 Montgomery St., 11<sup>th</sup> floor  
San Francisco, CA 94111  
(800) 328-4138