Privacy Policy

June 13, 2016
# Table of Contents

**Purpose** ........................................................................................................... 3  
**Scope and Applicability** .................................................................................... 3  
**Definitions** ....................................................................................................... 4  
**Policy** ................................................................................................................ 6  
  - Overview ........................................................................................................... 6  
  - Collection and Use of Your Information ............................................................ 6  
    - Information you provide us directly ............................................................... 6  
    - Information we may receive from third parties .............................................. 6  
      - Google Analytics ....................................................................................... 6  
      - Cookies Information .................................................................................. 7  
      - Social Media Features and Widgets ............................................................ 7  
    - Commercial and marketing communications ............................................ 7  
    - Testimonials .................................................................................................. 7  
    - Surveys ......................................................................................................... 7  
  - Use of certain service type information we collect about you ....................... 8  
  - Sharing of Your Information ............................................................................ 8  
  - Disclosure of information ............................................................................... 8  
  - How we store and protect your information .................................................. 9  
    - Storage and Processing ............................................................................... 9  
    - Security of Information ............................................................................... 9  
    - Compromise of Information ........................................................................ 9  
  - Your Choices about your Information .............................................................. 9  
    - Consent ....................................................................................................... 9  
    - Opt Out ....................................................................................................... 10  
    - Changing or deleting your personal information ......................................... 10  
      - Deactivating your account ....................................................................... 10  
  - Children’s Privacy ............................................................................................. 10  
  - Links to Other Websites .................................................................................. 10
PURPOSE

eMASON, Inc. dba Clarifire’s (herein Clarifire or Company) Privacy Policy is set forth to outline the use and protection of information provided by site visitors. By using this site, you agree to the collection, use and disclosure of information received in accordance with this Policy.

Privacy of personal information is of the utmost importance and priority. Therefore, Clarifire complies with the EU-U.S. Safe Harbor Framework and U.S. Swiss Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information. Clarifire has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement by way of SOC 2 Type II compliance controls.

Policy has been implemented to maintain and mitigate the risk of potential loss of intentional or accidental access, disclosure, transfer, modification, corruption, or loss of restricted, confidential, and personal information.

SCOPE AND APPLICABILITY

This Policy applies to all individuals, including but not limited to employees, subcontractors, suppliers, and other third party suppliers that have a business relationship with Clarifire.

This policy does not apply to Clarifire client’s SaaS environments who use this site for their business purposes. Such clients are solely responsible for data and information collected and stored within their site, and thus maintain their own individual privacy policy.
## DEFINITIONS

The terms and acronyms used in this document are provided in the following table. For terms used at Clarifire, access the Corporate Master Glossary from the Corporate (eMASON Internal) Portal.

<table>
<thead>
<tr>
<th>Term/Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>CESC</td>
<td>Corporate Executive Steering Committee. This committee oversees the business and technology governance structure and processes for Clarifire.</td>
</tr>
<tr>
<td>Confidential data/information</td>
<td>Data or information for which unauthorized access to or disclosure could result in an adverse effect.</td>
</tr>
<tr>
<td>Controlled document</td>
<td>A controlled document is maintained, updated, and formally approved with traceable distribution.</td>
</tr>
<tr>
<td>COO</td>
<td>Chief Operating Officer. Executive responsible for the day-to-day operations at Clarifire.</td>
</tr>
<tr>
<td>Cookie</td>
<td>Identifiers usually sent through your browser that reside either temporarily or permanently on your computer or device hard drive. Used to store user preferences for a specific site.</td>
</tr>
<tr>
<td>Data</td>
<td>Data is raw, unorganized facts that need to be processed. Data can be something simple and seemingly random and useless until it is organized. Also see Information.</td>
</tr>
<tr>
<td>dba</td>
<td>doing business as</td>
</tr>
<tr>
<td>Effective Date</td>
<td>The date when a controlled document is signed by the appropriate Executive approver, or proxy.</td>
</tr>
<tr>
<td>Electronic media</td>
<td>Data or information stored on hard-drives, CD-ROM, disks, flash drives, back-up tapes, etc.</td>
</tr>
<tr>
<td>ePHI</td>
<td>Electronic Protected Health Information. Computer-based patient health information that is created, received, stored or maintained, processed, and/or transmitted in electronic media. Also see PHI.</td>
</tr>
<tr>
<td>Functional group</td>
<td>At Clarifire, the functional groups include Business Operations, Finance/Legal, Human Resources, and Technology. The information provided in this controlled document is owned, updated, and reviewed by the appropriate functional group.</td>
</tr>
<tr>
<td>Implementation</td>
<td>Provides how a controlled document will be communicated to applicable individuals, including training as necessary.</td>
</tr>
<tr>
<td>Information</td>
<td>Data that is processed, organized, structured or presented in a given context so as to make it useful.</td>
</tr>
<tr>
<td>Information security</td>
<td>The protection of information and information systems against unauthorized access or modification of information, whether in</td>
</tr>
<tr>
<td>Term/Acronym</td>
<td>Definition</td>
</tr>
<tr>
<td>--------------</td>
<td>------------</td>
</tr>
<tr>
<td>storage, processing, or transit, and against denial of service to authorized users.</td>
<td>Information Security Team</td>
</tr>
<tr>
<td>includes but not limited to all Clarifire computers, networking equipment, software (including our CLARIFIRE application), and data.</td>
<td>Information systems</td>
</tr>
<tr>
<td>Information Technology. The Clarifire department responsible for security (data/technology/office), servers, software patches and updates, network drives, and phone system.</td>
<td>IT</td>
</tr>
<tr>
<td>The date when a controlled document is due for a review by the controlled document owner or designee.</td>
<td>Next Review Date</td>
</tr>
<tr>
<td>People employed by an organization.</td>
<td>Personnel</td>
</tr>
<tr>
<td>Protected Health Information. Electronic manifestation of an individual’s first name or first initial and last name in combination with one or more of the following: Social Security Number (SSN), Driver's license number or State-Issued ID card number, Account number, credit or debit card number, Account number, credit or debit card number, Medical information, Health insurance information, etc.</td>
<td>PHI</td>
</tr>
<tr>
<td>Personally Identifiable Information. Refers to information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Non-PII can become PII whenever additional information (in any medium and from any source) is made publicly available when combined with other available information that could be used to identify an individual.</td>
<td>PII</td>
</tr>
<tr>
<td>Clarifire’s intranet site that provides access or links to controlled documents and other corporate communications. Also referred to as Corporate (eMASON Internal) Portal.</td>
<td>Portal</td>
</tr>
<tr>
<td>RESCUE Ticket Number. RESCUE is part of the CLARIFIRE application used to view and document progress on support tickets. The RTN is generated once a user opens or creates a support ticket in the CLARIFIRE application.</td>
<td>RTN</td>
</tr>
<tr>
<td>Refers to third party or outsourced suppliers.</td>
<td>Service provider</td>
</tr>
<tr>
<td>Person, business, or corporation that provides goods or services to another entity under terms specified in a contract. Includes contractors, consultants, agents, representatives, and advisors.</td>
<td>Subcontractor</td>
</tr>
<tr>
<td>Uniform Resource Locator. Also known as web address.</td>
<td>URL</td>
</tr>
</tbody>
</table>
### POLICY

#### Overview

Clarifire is committed to respecting the privacy of individuals and the information provided to our company during the use of this corporate website. This Policy has been enacted to protect and treat your information with the utmost care and consideration. It provides the framework for describing the guiding principles and responsibilities necessary to safeguard the privacy of site visitors.

The standards and responsibilities described within this Policy and supporting policies, procedures, and guides, and defines privacy requirements for Clarifire.

#### Collection and Use of Your Information

User or site visitor personal information is collected in one of two ways, directly by the individual or is received from third parties. Regardless of the manner in which the information is collected, Clarifire maintains the same policy for handling and safeguarding personally identifiable information as detailed below.

**Information you provide us directly**

Personally identifiable information is collected upon registration for a Clarifire service account, when becoming an affiliate or reseller, when completing forms or requesting information, support, or product and service information, and when subscribing to our news. In such instances, the following types of personally identifiable information are collected and provided directly to us by you: name, title, phone number, email address, mailing address, website URL, employer or company. Additionally, you may be asked to provide occupation and business or industry type data. Any communications submitted through our site and service may also be retained. When signing up for a paid Clarifire service, billing information, including your credit card number, expiration date and billing address are collected. For details on how your information is secured, see [Security of Information](#) below.

**Information we may receive from third parties**

We may directly collect analytics data or use third party analytics tools and services, to help us measure traffic and usage trends for the site. These tools collect information sent by your browser or mobile devices automatically.

**Google Analytics**

Clarifire utilizes Google Analytics to receive and record the following information from every site visitor’s browser: IP address, browser type, referrer page, domain name, access time, entry page, exit page, operating system type, and search engine keywords used.
Google Analytics uses a first party cookie and JavaScript code to collect visitor site usage data. Including a user’s interaction and activity on the Clarifire’s website. This information is collected in aggregate form such that it cannot be easily manipulated to identify any particular individual user, in other words, anonymously.

**Cookies Information**

Cookies are identifiers usually sent through your browser that reside either temporarily or permanently on your computer or device hard drive. Clarifire uses cookies tied to personally identifiable information for service operation and to provide a more effective service to our users. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify browser settings to decline cookies if you prefer. If you disable cookie functions on your browser, certain services and functionalities, like [Social Media Features and Widgets](#), will not work.

**Social Media Features and Widgets**

Our site provides several social media functions, such as the Facebook Like button and widgets, ShareThis button, and other interactive mini-programs. These features may collect your IP address, page information, and may set a cookie to enable the feature to function properly.

These features allow Clarifire to provide a more relevant and user friendly experience to our users and site visitors. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with such services are governed by the privacy policy of the company providing it.

**Commercial and marketing communications**

Clarifire uses the information we collect or receive, such as your email address, to communicate directly with you. Communications may include emails containing newsletters, promotions and special offers. If you wish to discontinue these services, you have the option of opting out of such communications and changing your preferences.

**Testimonials**

Occasionally customer testimonials may be posted to our site that may include their name, logo, graphic, sound or image. Customer consent is always obtained prior to publishing publicly. However, Clarifire is not responsible for the personal information a user elects to disclose within their testimonial.

Furthermore, personal registration information communicated and shared within our public forums are solely the responsibility of the individual user. Any personal information disclosed can be used to send you unsolicited messages by other members of this forum, to which Clarifire holds no responsibility. Please use the utmost discretion when communicating on any public platforms.
Surveys
Clarifire often uses surveys with the intent to gather and collect information we use to help us better understand the needs and requirements of our customers, and ultimately improve our products and services.

From time to time, we may invite you to participate in online surveys administered by Clarifire or a third party. Surveys may request personal information, for instance, name and email address, and questions about your experiences with Clarifire products, services, or specific features.

Results from surveys may be shared in an aggregate format with third parties and remain under the protection and responsibilities outlined throughout this Policy.

Use of certain service type information we collect about you
Any information collected is used to measure our business success, to identify the most effective ways to reach you, the customer, to more effectively meet your needs and requests for certain new product features and services, and to contact you about product upgrades. If you have chosen to receive email communications, you will receive our infrequent news and announcements.

Sharing of Your Information
Clarifire does not sell or lease an individuals’ personal data to other companies for any purpose. Any information collected or provided during the course of use of our site or service is subject to the principles and responsibilities outlined within this Policy.

Disclosure of information
We will not sell, disclose or lease your personal information to third parties without your permission unless required by law or as stated in the exceptions below:

- When we have your consent to share said information
- When we need to send the information to companies that work on our behalf to process an order you have made with Clarifire to provide a product or service to you. (Note: These companies are not permitted to use your information for any reason other than to support us in assisting you. We employ the services of third party payment processors to complete the payment fulfillment process for purchases made on the site)
- When we conform to edicts of the law, to respond to subpoenas, court orders, or legal processes
- When you have violated our Terms of Service Agreement for the service you are using or have used
- When we act under exigent circumstances to protect the personal safety of our customers or the public
- When we need to protect and defend the rights or property of Clarifire
We may share aggregate data about our customers with other companies. In such cases, no personally identifiable information will be provided to third parties.

**How we store and protect your information**

**Storage and Processing**

Any information you provide to us will be retained for as long as your account is active or as needed to provide you services. Additionally, Clarifire will retain and use your information as necessary to comply with our legal obligations, dispute resolutions, and in order to enforce our agreements.

**Security of Information**

Clarifire is committed to data integrity and security, especially in reference to your privacy. Measures are employed to restrict physical access to Clarifire servers where data is stored, encryption standards are in place for data in transit (Secure Socket Layers protocol), and by utilizing other commercially reasonable safeguards to preserve all information collected through the site or Service.

For both security and privacy purposes, we require that Clarifire accounts be password protected. The user is responsible for maintaining the secrecy of account passwords, information, and controlling access to email communications from Clarifire at all times.

Though Clarifire makes every attempt to protect your information, we cannot guarantee the security of any personal information you transmit to us and you do so at your own risk.

**Compromise of Information**

In the event that any information under our control is compromised as a result of a breach of security, Clarifire will take steps to investigate the situation and make appropriate notifications to impacted individuals in accordance with applicable laws and regulations.

**Your Choices about your Information**

Users can choose to restrict the collection or use of their personal information in the following ways:

- Whenever you are asked to fill in a form on a website, select the checkbox indicating that you do not want the information by used by anyone for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by emailing us at clientcare@eclarifire.com.

  ➤ Note: Account information and preferences can be updated at any time by following the steps outlined below.

**Consent**

By using our website and services, you consent to the collection and use of the information you provide to us as described throughout this Policy. Clarifire may change this Privacy Policy at any time.
Statement at any time, without notice. Our current Privacy Policy is maintained on this site and can be accessed at any time.

**Opt Out**

To stop receiving promotional email communications from us, select the ‘unsubscribe’ link within the corresponding Clarifire email. We make every attempt to promptly process unsubscribe requests. You may not opt out of Service-related communications (i.e. account verification, purchase and billing confirmations, technical and security notices, etc.) If you have any questions about reviewing or modifying your account information you can contact us directly at clientcare@eclarifire.com.

**Changing or deleting your personal information**

Site visitors and users control Clarifire account information and settings. Personally identifiable information can be updated or deleted any time by logging into your Clarifire service account and selecting the ‘Account Information’ option.

**Deactivating your account**

To deactivate your Clarifire account, please contact the Clarifire Client Care team.

**Children’s Privacy**

Clarifire does not offer information intended to attract children. We do not knowingly solicit personal information from children under the age of 13, nor do we allow such persons to register as users. In the event that we learn that we have collected personal information from a child under the age of 13 without verification of parental consent, we will delete that information as quickly as possible.

**Links to Other Websites**

Our website may contain links to information on other websites. As Clarifire holds no control over this other sites, we cannot be held responsible for the protection or privacy of information you choose to share while visiting such sites. If there are questions about your privacy and security with those sites, please defer to that site’s privacy policy.