

This document (“Privacy Policy”) outlines how Integrated Business Environment Inc. doing business as iBE.net and our affiliates (“iBE.net”, “we”, “us”, “our”) uses and protects data collected through iBE.net’s proprietary software and services available via mobile device stores and on our web-site (“Service”) at [www.ibe.net](http://www.ibe.net), [app.ibe.net](http://app.ibe.net) and other related web-sites (“Sites”). This Privacy Policy is incorporated into iBE.net’s Terms of Service.

Protecting personal data is a core value of iBE.net’s. You should read this document to understand your options regarding our use of:

- Information that specifically identifies an individual or is linked to such identifying personal information that you enter into our Sites (“Personal Data”)
- Anonymous aggregated information that may be based on Personal Data but which does not identify any individual and is normally in summarized form (“Anonymous Data”).

Anonymous Data that is combined with Personal Data is Personal Data.

We may update this Privacy Policy from time to time, and we will post any updates to our Site. If you have any questions or concerns about this Privacy Policy please contact us at [support@ibe.net](mailto:support@ibe.net).

By using the Service, you consent to our latest published Privacy Policy.

## **1. Collection and Use of Data**

When you register for or use the Service, or as part of our relationship with you, you may be asked to provide Personal Data. You may also at your discretion use our Service to track and manage the Personal Data of others, such as your contacts or customers. When you participate in iBE.net’s promotional programs, or share content with others for example through a social network or chat-room feature of the Service, or invite others to register for or use the Service, we may collect additional Personal Data. Finally if you register for on-line payment for the Service, we may collect necessary billing and financial information. This is sometimes collected via and held by a third-party payment service provider.

The Personal Data we collect allows us to provide the Service to you and is collected primarily to help you use the Service and gain access to information you have requested, for example through your desire to track your personal information or contacts using the Service. In addition, the Personal Data we collect may be used to help us improve the Service, to better respond to your requests for help or support, to send you important notices such as changes to terms, to request feedback from you and to keep you informed about upcoming features, Services and events. You may opt out of our mailing list and stop

receiving information of a promotional nature from us at any time, via the Service.

Anonymous Data may be collected through your use of the Service or as a result of visiting our Sites, or created by us through aggregation of Personal Data. Anonymous Data may be used for any purpose, including to help us better understand customer behavior, gain feedback on the usage of our Services, to improve the Service for example in the development of new features, and for our own internal auditing, data analysis, marketing and research purposes.

Cookies and related technologies are small data files stored on your device or computer at the request of a web-site to enable that web-site to recognize the user via their device, and retain certain preferences for that user, for example remembering their username and password for a limited time-period for convenience. We treat non-personal information such as IP addresses and geo-locations collected via cookies as Anonymous Data, unless it is combined with Personal Data or unless it is considered personal information by local law. You may block, or receive warnings about cookies at any time through your web browser preferences – please refer to the help documentation on your specific browser for more information. We use cookies for your convenience when you repeatedly use the Service and we cannot guarantee access to all features of the Service if you block cookies in your browser.

Emails sent automatically by the Service may include clickable buttons or texts which when clicked perform certain updates or notifications to the Service for your convenience. We may track your usage of click-through email texts. We may also track whether you have opened a email sent by the Service.

Our web-site may be linked to services provided by third parties not owned or operated by iBE.net who assist us in delivering the Service, or who work with us in jointly marketing, developing or delivering the Service (“Third Parties”). Your disclosure of Personal Data to Third Parties is normally subject to the privacy policies of the Third Party, and we do not have control over their web-sites. Any Personal Data that we send to or receive back from the Third Party without your knowledge shall however be subject to the terms of this Privacy Policy.

## **2. Protection of Your Data**

iBE.net takes precautions to ensure physical, procedural, and technical safeguards to preserve the integrity and security of your Personal Data, and to prevent any loss, theft, unauthorized access, deletion or mis-use of Personal or Anonymous Data. The Service uses Secure Sockets Layer (SSL) encryption for our web-pages where Personal Data is collected, and you must use an SSL-enabled browser to access the Service. We operate on the principle that iBE.net’s employees, agents and contractors must have a reasonable business need to access any Personal Data.

iBE.net only shares Personal Data with Third Parties that require such information to provide services so that we may deliver the Service. The Service has controls in place to prevent one organization from viewing or updating the data belonging to another organization, beyond basic access rights inherent when electing to collaborate, send messages or share documents.

Personal Data is shared by default with other members of your organization using the Service or with other persons whom you have invited to use the Service on behalf of your organization. By default your Personal Data is not accessible to users of the Service who have not registered on behalf of your organization, except for persons you are knowingly sharing your Personal Data with or members of a forum or conversation in which you share Personal Data. You may opt to hide Personal Data from others within your organization using the Service, and you may opt to share Personal Data with people outside your organization who use the Service or who use the Service other than on your behalf.

We will not share Personal Data with Third Parties for their own internal business or marketing purposes. We may disclose Personal Data if we are legally required to do so, or if it is reasonably necessary to comply with a law or legal authority, or to protect the rights, property or safety of the Service including protection from fraudulent, abusive or unlawful use of the Service. In the event that another company acquires all or substantially all of the assets of our business through a consolidation, merger, asset purchase, or other transaction by operation of law or fact, we reserve the right to transfer all data (including Personal Data) that is in our possession or under our control to such acquiring party.

We will provide you access to Personal Data collected from you so that you may correct, amend or delete that information. We will not alter your Personal Data without your prior consent.

We will make best commercial efforts to notify you promptly as soon as we are aware of any data security breach or unplanned disclosure involving your Personal Data.

You may choose not to provide Personal Data to our Service, which may in turn prevent you from using the Service. You may opt out of promotional and marketing materials but we may still send you critical notices that require action or notification as part of your continued use of the Service. Ultimately you provide Personal Data to us and to Third Parties at your own risk and you should be careful in giving out your Personal Data to any external party.

The Service is not directed to persons under 13 years of age and we will not knowingly collect any Personal Data from persons under 13 years of age. Protecting the privacy of children is particularly important and we will delete Personal Data of persons under 13 years of age that we are aware of, unless express consent is given by a parent or guardian to retain such data.

### **3. United States and Safe Harbor**

The Service is hosted in the United States and Personal Data you provide to us may be accessed in any country, subject to the terms of this Privacy Policy. We have not yet applied for registration under the United States Department of Commerce Safe Harbor Privacy Principals (the “Safe Harbor Principals”), however, we intend to make reasonable commercial efforts to abide by the frameworks of the Safe Harbor Principals, regarding notice, choice, transfer, security, data integrity, access, collection, use and retention of Personal Data. As such, we are not in compliance with the US-EU Safe Harbor Framework and the US – Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding collection, use and retention of Personal Data from the EU and Switzerland.

Before transferring any Personal or other protected Data from any jurisdiction outside the US to iBE.net, you must assure itself that it is in compliance with any applicable local laws, rules, regulations, orders and the like. We shall not be responsible for assuring any such compliance and will rely on you to determine the appropriateness and legality of any transfer of Personal Data. We will advise you at such time as iBE.net has become registered under the Safe Harbor Principals.