



International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

Our Commitment to Privacy

IAS understands and appreciates that you are concerned about your privacy and about the confidentiality and security of information we may collect from you. IAS is committed to safeguarding your privacy. This commitment includes controls on the protection and use of personal information within our organization, its systems and its web sites.

What This Policy Describes

This Privacy Policy describes IAS's current policy with regard to "Personally Identifiable Information". Personally Identifiable Information is information identifiable with any particular named natural person. Publicly available information — such as a public directory listing of your name, address, telephone number, email or other electronic address — is not considered to be Personally Identifiable Information.

IAS collects Personally Identifiable Information through the Service (as defined in the IAS Service Agreement or Member Agreement ["Agreement"]), by e-mail correspondence, through third parties, or by any other means. In addition to disclosure to third parties as indicated below, the information you provide will be used by IAS and its affiliates to contact you regarding your inquiries and to otherwise operate the Service.

Employees and Agents

This Privacy Policy also governs the behavior of our employees and agents acting on our behalf. All of our employees who have access to personal information receive training on using and protecting that information. All of our employees and agents are bound by confidentiality and other agreements requiring them to protect any personal information they may access as part of their job.

Information We Collect

We collect information from you in order to provide you with a smooth, efficient, and customized experience while enjoying services provided by IAS. Some of this information may be Personally Identifiable Information, such as your system password and email address; your address, country, phone number and fax number; and your system preferences. The more information you volunteer (and the more accurate it is), the better we are able to customize your experience.

IAS automatically tracks certain information about you based upon your behavior on the IAS web sites. IAS uses this information to conduct internal research on users' preferences and behavior to better understand and serve our users. This information is compiled and analyzed on an aggregated basis in accordance with this Privacy Policy.

To use the Service provided by IAS, you will need to register as a user by providing Personally Identifiable Information, including your name and contact information at your place of business such as company name, e-mail address and telephone number. Some users may access the



International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

Service under company membership rather than an individual membership. In these cases, your registration will be carried out by your company administrator or by such party authorized by you, who will provide your Personally Identifiable Information and carry out other tasks on your behalf.

Visitors to the IAS web sites may also be asked to complete various online forms requesting Personally Identifiable Information, such as name and e-mail address, in order to access other services or information provided by IAS. Please note that electronic forms may not be encrypted. Whenever IAS collects Personally Identifiable Information on the IAS web sites, we make an effort to include a link or other pointer to this Privacy Policy.

Third Parties

The IAS web sites may also contain links to third party resources which may collect Personally Identifiable Information about you. If you access or use any such links to such third party resources, any information you reveal in connection with such third party resources or any services offered thereon is submitted directly to the third party resources and is not governed by this Privacy Policy. You should consult the privacy policy of the third party resources with respect to its treatment of any information that you may reveal in connection with such site or service. If those third parties collect information about you, they may share certain information with IAS as part of our arrangements with those third parties.

IAS may contract with one or more third parties ("Third Party Host") to maintain and host the Service or portions thereof. Therefore, any information you submit, including Personally Identifiable Information, will be placed and stored on a computer server maintained by such third parties. Your use of the Service and any posting of data to the IAS web sites constitutes your acknowledgement that such data could pass through and may be stored in servers outside the control of IAS and may be accessed by the administrator of such site and others that gain access to IAS's or Third Party Host's server or stored files. Except as may be required by applicable laws, you agree that IAS has no liability or responsibility for any disclosure, authorized or unauthorized, resulting from or arising in connection with such pass through or storage of such data.

IAS may also provide Personally Identifiable Information to our vendors, suppliers and hosting providers (together with "Third Party Host", the "Service Providers") in order for such Service Providers to 1) provide us with products and services related to better operation and maintenance of the Service; or 2) assist us in processing information and/or carrying out any of the authorized uses of your data described below.

Cookies

IAS uses "cookies" as a fundamental part of our interaction with your Internet browser. The intention is to provide you with a better and more customized service and with a more effective web site. A "cookie" is a small text file placed on your computer by our webpage server. A cookie can later be retrieved by our webpage servers. Most cookies are "session cookies", meaning that they are automatically deleted at the end of a session.

International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

A cookie may be set when you register or “Log In” and is modified when you “Log Out” of our Services. Currently, each browser accessing the IAS web sites is given a unique cookie which is then used to determine the extent of repeat usage and usage by a registered user as opposed to an unregistered user. Most of the areas of the IAS web sites use cookies. Accordingly, if you wish to make full use of the IAS web sites, it is required that you accept cookies. If your browser is configured to reject all cookies you may be unable to use certain services on the IAS web sites that require cookies in order to participate.

You are always free to decline IAS’s cookies if your browser permits, although you may be unable to use certain services on the IAS web sites that require cookies in order to participate.

Use and Disclosure of Information

Personally Identifiable Information collected from you will generally be used by us or third parties or disclosed to third parties in ways set out in this Privacy Policy. By using or accessing the Service, you expressly consent to our use and disclosure of the information you provide to IAS.

Generally, IAS uses Personally Identifiable Information:

- to remind us of who you are and to access your account information (stored on our computers) in order to deliver to you a better and more personalized service;
- to estimate our audience size and to statistically analyze the usage;
- to identify pages you have accessed and third party resources you have accessed;
- to improve our marketing and promotional efforts;
- to measure certain traffic patterns, which areas of the Service you have visited or used, and your visiting patterns in the aggregate. We use this research to make each new experience on the Service a better one. IAS may also use this information to better personalize the content, banners, and promotions that you and other users will see on the IAS web sites;
- to resolve disputes, troubleshoot problems and enforce the Agreement;
- to improve our service;
- to provide the Service you request;
- for administrative, security and other legitimate business purposes.

IAS may also use Personally Identifiable Information to contact you:

- to deliver messages that you have requested as part of the Service, such as email messages;
- to deliver information to you that, in some cases, is targeted to your interests, such as new services, unless you have indicated, in accordance with this Privacy Policy, that you do not wish to receive this information;

International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

- to contact you regarding administrative notices, new features and communications relevant to your use of the Service, unless you have indicated, in accordance with this Privacy Policy, that you do not wish to receive this information.

Please see below for your choices in regard to the communications described above.

IAS will only disclose Personally Identifiable Information collected from you when:

- You have authorized IAS to do so (including as set forth herein);
- IAS believes that such disclosure is reasonably necessary to enforce the Agreement, to protect against fraud, or to respond to claims of violation of the rights of third parties or to protect the rights, property or personal safety of IAS, its affiliates, IAS users and the public;
- IAS believes that the use or disclosure is reasonably necessary to assist a law enforcement agency or an agency responsible for national security in the performance of their functions;
- IAS is authorized, required or permitted by law, governmental or quasi government agencies to disclose the information;
- IAS discloses the information in the ordinary course of business to Service Providers or our professional advisers and other contractors;
- You access third party resources from the IAS web sites. In that case, information generated by cookies and information about your preferences or other information that you provide about yourself may be shared between that third party, the person hosting the third party resources, and IAS and/or its affiliates;
- All or a portion of IAS or its affiliates (or the assets of one of those entities) is bought or sold. Personally Identifiable Information will likely be included among the transferred business assets.

You agree that IAS is authorized to disclose Personally Identifiable Information to the following entities, organizations and persons for as long as, and to the extent that, you have not notified IAS in writing that you object to such disclosures:

- Affiliates of IAS, who use the Personally Identifiable Information for the same purposes as IAS;
- Your representatives (e.g. your authorized representatives or legal advisers);
- Third parties with whom IAS is jointly offering or co-branding products, including business alliances of IAS, for purposes of making such joint product offerings and marketing them to you;
- Outsourced hosting service providers who manage the services we provide to you;
- Third Party Host;
- Credit-reporting and fraud-checking agencies;
- Our professional advisers, including our accountants, auditors and lawyers;
- Government and regulatory authorities and other organizations, as required or authorized by law;

International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

- Organizations involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables); and managing our corporate risk and funding functions;
- Telecommunication and information service providers;
- Third party licensors.

If you object to such disclosures, you must contact us in written form at the address listed below. Please note that to the extent the parties listed above are involved in offering or delivering information or the Service (or part thereof) that you have requested, your requests not to share your information with those parties may not be feasible.

Except as otherwise expressly discussed herein, this Privacy Policy only addresses the use and disclosure in the first instance of information we collect from you. Personally Identifiable Information about you provided by another party will for the purposes of this Privacy Policy be deemed to be Personally Identifiable Information collected from such other party, not you, whether such other party originally received the information from you or another source.

Information collected from you that is not Personally Identifiable Information may be used or shared as IAS in its sole discretion deems appropriate.

How We Handle E-mails

We will preserve the content of any e-mail that you send us. Any Personally Identifiable Information contained in your e-mail, including your e-mail address, will be used or disclosed in ways set out in this Privacy Policy. Your e-mail message content may be monitored by IAS's employees for trouble shooting and maintenance purposes or where e-mail abuse is suspected.

Choices Provided by IAS

You have the right to request IAS not to retain Personally Identifiable Information collected from you, and not to use such information except to provide the Service you requested. However, we may retain in our files some information you have requested to be removed in some circumstances, such as to resolve disputes, troubleshoot problems and/or enforce the Agreement. Further, such prior information is never completely removed from our databases due to technical constraints and the fact that we back up our systems. Therefore, you should not expect that all of your Personally Identifiable Information would be completely removed from our databases in response to your requests.

Please contact IAS customer service as stated below to exercise your rights in this regard. IAS may also provide you with online tools so you can manage e-mails from IAS by editing your profile directly to update your preference with regard to such e-mails. Once your profile is changed to request removal from email lists, you can expect to be removed from promotional distributions within ten (10) business days of the changes. In addition, all promotional e-mails from IAS contain instructions on how the recipient can opt out of receiving similar e-mails in the future.

International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

IAS communications such as administrative and technical notices, notices of new features and other messages relevant to your use of the Service may contain a link to a web page with instructions on how users can unsubscribe from these sorts of transactional messages. If you choose to unsubscribe to these messages, you will bear the risk that you may not receive messages that are important to your continued use of the Service.

Reviewing and Changing your Personally Identifiable Information

Through its interactive functions, IAS may allow users to directly input changes to their preferences, passwords and Personally Identifiable Information on an immediate basis. This may be accomplished by editing the user profile available on the applicable portion of the Service. Users who access the Service through a company membership or a carrier membership (as the case may be) may also submit requests to their company administrators to update their user profiles both for IAS and for any carrier maintaining a user profile on that user (if applicable). Users may also contact IAS customer service.

If your Personally Identifiable Information changes, you must promptly update us of any changes to your information by contacting IAS customer service or editing your user profile or requesting that your company administrator edit your user profile.

Security of Information

IAS takes reasonable steps to preserve the security of the Personally Identifiable Information collected in accordance with this Privacy Policy and of IAS-placed cookies.

IAS uses standard industry procedures to safeguard the confidentiality of your Personally Identifiable Information, such as firewalls and secured access to hosting locations. You acknowledge that notwithstanding the steps IAS takes to ensure security, there can be no guarantee of security on the Internet. IAS does not represent or warrant that your Personally Identifiable Information will be protected against loss, misuse, attacks, or alteration by third parties.

Important Reminders about Passwords

While using the Service, you may be provided with a unique password. You are responsible for the security of your password and you may not disclose your password to any third parties nor share it with any third parties. If you lose control of your password, you may lose substantial control over your Personally Identifiable Information and may be subject to legally binding actions taken on your behalf. Therefore, if the security of your password has been compromised for any reason, you should immediately notify us and change your password.

IAS will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail. Also remember to sign out of your IAS account in the correct manner and close your browser window when you have finished your work. This is to ensure that others cannot access your Personally Identifiable Information and correspondence if you share a computer with someone else or are using a computer in a public place.



International Asset Systems (IAS) Privacy Policy

Last Updated 22 February 2008

Acceptance and Changes to Privacy Policy

Access to and use of the Service is subject to this Privacy Policy and to the Agreement. By accessing, browsing, downloading, generating, receiving or transmitting any data, information or messages via the Service, you hereby accept for yourself and on your company's behalf, without limitation or qualification, this Privacy Policy and the Agreement. If you do not accept this Privacy Policy and the Agreement, do not use the Service. IAS may at any time revise this Privacy Policy without notice, and you are bound by such revisions and should therefore periodically revisit this page for any changes to this Privacy Policy. On revision, IAS will also change the "last updated" date at the top of the Privacy Policy.

Contacting Us

Should you have any questions about this Privacy Policy, the practice of the IAS web sites, or your dealings with the IAS web sites, you can contact:

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