

Effective Date: May 1, 2018

PTI Marketing Technologies Inc. dba MarcomCentral (“PTI”) respects your privacy and we are committed to protecting it. We recognize your need for appropriate protection and management of the Personal Data we learn about you while you visit the Website at www.pti.com and www.marcom.com (and any other sites owned by PTI that link to this policy) (the “Website”) and our suite of PTI Marketing Technologies Application software (“PTI Software”). This privacy policy is to inform you how we collect, store, use, disclose and secure information and how PTI may process your information will depend on the activity during your visit, use and what service(s) you request. We also advise on how to manage your individual rights with PTI for your Personal Data.

In furtherance of the PTI’s commitment to this Policy, PTI has certified to adhere to the Privacy Principles set forth in the US-EU Privacy Shield Framework (alternatively, “Accord”) and with the General Data Privacy Regulation (“GDPR”) regarding the processing of Personal Data related to customer, partners or clients of the PTI and are a resident in the European Economic Area (“EEA”). PTI adheres to the Privacy Shield principles as respectively agreed to by the U.S. Department of Commerce and the European Commission. With respect to Personal Data received or transferred pursuant to Privacy Shield, PTI is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

For additional details, please refer to the Privacy Shield Section of this Policy.

Personal Data

When you register for the Website or the PTI Software, request services or information, place an order, submit feedback, participate in a forum or survey, or otherwise use the Website or PTI Software, we may ask you for and collect Personal Data such as your name, address, email address, telephone number, employee identification number, and other similar identifying information (“Personal Data”).

Collection and Use of Your Information

Customers and individuals who use the Website or PTI Software are hereafter collectively called “Users”. Content and information transmitted by Users to or through the Website or PTI Software and Users’ Personal Data are collectively called “Customer Information.”

The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged PTI.

In general, we may use the Personal Data you submit to us to create your account on our network; identify you as a user in our system; administrate, operate, maintain and improve our Website and PTI Software; send you a welcome e-mail to verify the username and password provided when your account was created; send you administrative e-mail notifications, such as security or support and maintenance advisories; respond to your inquiries related to employment opportunities or other requests; to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and to make telephone calls to you, from time to time, as a part of our support and maintenance services.

Information Sharing

Except as otherwise stated in this policy, we do not generally share the Personal Data collected from our services with other entities. We may share your Customer Information with third party contractors or service providers to provide you with the services that we offer you through our Website and PTI Software. These third-party contractors or service providers are required not to use your Personal Data other than to provide the products or services requested by us.

PTI may disclose Customer Information if it believes such disclosure is necessary to (a) comply with a subpoena or other legal process; or (b) when we believe in good faith that disclosure is necessary to protect or defend the rights, safety, or property of PTI, users of the Website or PTI Software, or any person including to enforce our agreements, policies, and terms of use, investigate fraud or respond to a government request; or (c) in an emergency to protect the personal safety of any person.

We may also share Customer Information in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company, in which case you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Data, and choices you may have regarding your Personal Data.

We may also share aggregated data with others for their own uses.

User Data Supplementation

We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. This helps us to update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you. If you provide us Personal Data about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

Examples of the types of Personal Data that may be obtained from public sources or purchased from third parties and combined with information we already have about you, may include:

1. Address information about you from third party sources, such as the Postal Service, to verify your address so we can properly ship your order to you and to prevent fraud.
2. Purchased marketing data about our customers from third parties that is combined with information we already have about you, to create more tailored advertising and products.
3. Order History of Marketing items displayed in the portal or account order system information
4. Information from about third-party vendors for content creation print orders, including distribution, fulfillment and shipping information.

PTI may use such information from time to time to support User activities on the Website or PTI Software, or for its marketing and sales efforts to Users and prospective customers. The PTI sales team may contact you based on this information to gauge your company's interest in PTI services and technologies, including the Website and PTI Software.

Data Subject Rights

To exercise any of the following rights, please contact inquiries@marcom.com

Right to Request Access

You may request details of Personal Data which we hold about you. Upon request, we will provide a copy of such Personal Data within a reasonable timeframe.

Right to Rectification

If you believe that any Personal Data we are holding on you is incorrect or incomplete, please contact us as soon as possible, at the address below. We will promptly correct any Personal Data found to be incorrect.

Right to Object

You may choose to object to the collection or use of your Personal Data:

- whenever data is processed for the legitimate interest of PTI
- whenever data is processed for a task carried out in the public interest or in the exercise of official authority vested in PTI

Please note that your objection may be overridden by the legitimate interests of PTI to process and collect your Personal Data.

Right to Erasure

To the extent legally permissible, you may be entitled to have certain Personal Data erased in the following circumstances:

- The Personal Data is no longer necessary in relation to the purposes for which it was collected or processed
- You object to the collection or use of your Personal Data and there are no overriding legitimate grounds for the processing
- The Personal Data has been unlawfully processed
- The Personal Data has reached the defined retention period to be erased or for compliance with a legal obligation to which PTI is subject

Right to Restriction of Processing

You may have the right to restrict further processing of your Personal Data in the following situations:

- You contest the accuracy of the Personal Data
- The processing of the data is unlawful.
- The personal data PTI has reached the defined retention period no longer needs the Personal Data for the purposes of the processing, but you require the Personal Data to establish, exercise, or defend legal claims.

- You object to the processing may be restricted pending the verification of whether PTI's legitimate grounds override your rights as a data subject.

Right to Portability

You have the right to receive your Personal Data in a structured, commonly used and machine-readable format. PTI will assist in the transmission of such data to another entity, upon request, to the extent technically feasible.

Consent and Choice

By submitting Personal Data through our Website or PTI Software, you expressly consent to the processing of your Personal Data in accordance with this Privacy Policy. You may opt-out of further processing of your Personal Data in the following situations:

- Advise Us to not share data with third parties other than our agents.
- Before we use it for a purpose other than which it was originally collected or subsequently authorized.
- If you do not want to receive marketing and sales information from us.

Note that certain emails addressed to Users and prospective customers promoting PTI solutions or services may allow opt-out of communications by clicking on the unsubscribe link provided in the email.

Data Retention

Please be aware, however, even if we update your Personal Data in our contact list, or we remove such information, we may retain this information in other databases for legal or regulatory purposes and may be anonymized to compile aggregated or demographic information and transferred to third parties in accordance with this privacy policy.

We will also retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to resolve disputes and enforce our agreements.

Passive Collection

As is true of most websites and online services, we gather certain information automatically. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.

We use this information to help us evaluate and improve our Website or PTI Software, analyze trends, track User's movements around the Website, and for marketing and investment analysis. We may share this information with third parties in aggregate statistical form that includes no Personal Data.

Cookies and Tracking Technologies

PTI and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. To manage Flash cookies, please click here:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html

How We Respond to Do Not Track Signals

Some web browsers may transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise our policy on responding to these signals.

Marketing and Analytics Companies

We partner with a third party to display advertising on our website or to manage our advertising on other sites. Our third-party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising <http://pages.marcom.com/Update-Your-Preferences.html>. Please note you will continue to receive generic ads.

We may work with certain third party analytics companies that collect information anonymously and report website trends without identifying individual visitors. These services allow us to view a variety of reports about how visitors interact with the Website so we can improve the Website and understand how people find and navigate it. Currently, we work with Google Analytics. This is not intended to be a comprehensive list and we may stop working with this company and work with others without notice. You can learn more about how these companies collect, use and share information about you by visiting their websites.

Security

PTI uses commercially reasonable efforts to protect the Website and PTI Software and to prevent unauthorized access, use, and disclosure of Customer Information. Users have a password that must be used each time a User logs-in to the PTI Software or the Website. Users may change their password at any time. PTI strongly urges Users not to share their passwords with others, and not to use the same password(s) that you use on the Website and PTI Software with other online services. Also, PTI strongly recommends that each User log-out completely after User is finished using the PTI Software or Website. Unfortunately, no data transmission over the Internet can be guaranteed to be secure, and every system that allows online access is potentially vulnerable to outside attacks from unauthorized third parties. As a result, while PTI strives to protect Customer Information, PTI can't and doesn't guarantee or warrant the security of any Customer Information which User transmits to PTI, and User does so entirely at User's own risk.

Linked Sites

Our Website and PTI Software may link to other web sites not controlled by PTI. We are not responsible for the privacy or security practices of any other web sites, and you acknowledge and agree that any visits to or use of such other web sites is entirely at your own risk. You should carefully review the privacy and security practices of the other web sites before you provide such web sites with any of your Customer Information.

Processor Policy

PTI collects information under the direction of its Clients and has no direct relationship with the individuals whose Personal Data it processes. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer Personal Data to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

PTI (and its parent/subsidiary company(ies) PTI Technologies LTD and MarcomCentral participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. PTI is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List. [<https://www.privacyshield.gov/list>]

PTI is responsible for the processing of Personal Data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. PTI complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. For questions relating to Personal Data policies, or to opt-in or opt-out of specific communications from PTI, contact PTI at the email address inquiries@marcom.com or the mailing address set forth below. We will respond to these requests in a reasonable timeframe.

With respect to Personal Data received or transferred pursuant to the Privacy Shield Frameworks, PTI is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, PTI may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website [<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>], you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Contact Us

If you have a question or comment about the Website and/or PTI Software or wish to exercise your individual rights, please contact us at <http://inquiries@marcom.com> or the mailing or email address set forth below. We will respond to your request within a reasonable timeframe.

Write Us at the following Post Address

PTI Marketing Technologies, Inc.
Lomas Santa Fe Drive #300
Solana Beach, Ca 92075

Email Us

Inquiries@marcom.com

Changes to the Privacy Policy

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Data, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our Website. Any material changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our site. These changes will be effective immediately for new users of our Website, PTI Software or related services. Please note that at all times you are responsible for updating your Personal Data to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. In any event, changes to this Privacy Policy may affect our use of Personal Data that you provided us prior to our notification to you of the changes.