

# **Privacy Policy**

Thank you for visiting the CPA Affiliates Network affiliate network website located at [www.cpaaffiliatesnetwork.com](http://www.cpaaffiliatesnetwork.com) (the "Site"). CPA Affiliates Network ("we", "us") is committed to protecting the privacy your personally identifiable information. We provide this privacy policy ("Privacy Policy") in order to explain our online information practices and the choices you can make about the way your information is used by us. You must agree to this Privacy Policy, in its entirety, including our use of cookies in order to: register an account ("Account") with the CPA Affiliates Network affiliate network ("Affiliate Network") and log-in to your Account as member of the Affiliate Network. Your acceptance of both this Privacy Policy and our use of cookies on the Site shall be deemed a blanket acceptance of such Privacy Policy and cookie usage for all future attempts to log-in and access your Account. If you do not agree to this Privacy Policy in its entirety, you are not authorized to register for an Account on the Affiliate Network.

**Privacy Policies Used in Connection with Your Subscription.** When you register for an Account on the Affiliate Network, we use a password-protected third party portal to store your personal information, and we may share your personal information with such third party ("Third Party Agent") as is necessary for the performance of your Account and the Affiliate Network.

**Personally Identifiable Information.** We collect personally identifiable information when you register for an Account or otherwise choose to provide personally identifiable information to us. Personally identifiable information is any information that can be used to identify or locate a particular person or entity. This may include, but is not limited to: business entity name and/or your title with the applicable business entity, as well as your personal and/or business entity related e-mail address, mailing address, daytime and/or cellular telephone numbers, fax number, account information (or other information that we require in order to pay any amounts due to you under the Affiliate Network) and/or any other information requested on the applicable Subscriber registration form. For purposes of this Privacy Policy, your account information shall be considered "Sensitive Information."

**Non-Personally Identifiable Information.** We may collect certain non-personally identifiable information about you when you visit certain pages of this Site and/or register for an Account on the Affiliate Network, such as the type of browser you are using (e.g., Netscape, Internet Explorer), the type of operating system you are using, (e.g., Windows '98 or Mac OS) and the domain name of your Internet service provider (e.g., America Online, Earthlink), and share such information with our Third Party Agent. We use the non-personally identifiable information that we collect to improve the design and content of the Site and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze Site usage.

**Cookies and Web Beacons.** To enhance your experience with the Site, we use "cookies." You cannot register to the Subscription or log-in to the Affiliate Network without agreeing to accept the cookies that we use with the Site. For more specific information on the cookies we use, please see Exhibit A, below. Cookies are small packets of data stored on your computer. Cookies are used by your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. We use cookies to understand Site usage and to improve the content and offerings on the Site. You may set your browser to warn you that cookies are in use, or to block the use of cookies. Most browsers are set to accept cookies. If your browser is not set to accept cookies, certain uses of the Site may require you to go to your browser user preferences to enable cookies. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. If you change computers, operating systems or browsers, or use multiple computers or browsers, you will need to repeat this process for each computer and each browser. To

find out more about cookies, please visit [www.cookiecentral.com](http://www.cookiecentral.com)

We may additionally collect information using Web beacons, which are commonly referred to in the industry as web bugs, pixel tags or Clear GIFs. Web beacons are electronic images that may be used on the Site, in your Account, or in our emails to deliver cookies, count visits and determine if an email has been opened and acted upon.

**End User Information.** We do not collect personally identifiable information about your end users. However, we do use cookies to track anonymous traffic data about your end users. When end users who visit member affiliate sites click on the advertisement(s) they have chosen to display through their Accounts on the Affiliate Network, we will utilize cookies and/or web beacons to track such end users activities at our merchant site(s). In certain circumstances, we may use cookie-less tracking methods to track such end users.

**Use of Information.** We use your personally identifiable information: (a) to send you information regarding your Account and the Affiliate Network; (b) to track your compliance with the Terms and Conditions ("Terms and Conditions"); and/or (c) for validation, suppression, content improvement and feedback purposes. You agree that we, or our Third Party Agent, may contact you at any time with updates and/or any other information that we may deem appropriate for you to receive in connection with your Account on the Affiliate Network.

**Information Sharing.** As a general rule, and other than in connection with the limited exceptions set forth below, we will not sell, share or rent your personally identifiable information to or with others. Notwithstanding the foregoing, we may, from time to time, provide such information to certain third-party administrative vendors for efficiency purposes in providing administrative or program management services in connection with your Account. Any third-party vendor so used has agreed to protect the confidentiality of information provided by us.

Further, we reserve the right to share your personally identifiable information: (a) where required by law, or requested by a court of competent jurisdiction; (b) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock; (c) where you are in violation of this Privacy Policy, the Terms and Conditions and/or Services Agreement; (d) in the case of a dispute; or (e) where we determine, in our sole discretion, that such disclosure is necessary to protect our rights and/or a third party, or necessary to protect us from liability of any kind. The aforementioned includes exchanging information with other companies and organizations for fraud protection.

**International Transfer of Data.** As part of your membership in the Affiliate Network, we may transfer information that we collect about you and your end users, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you or your end users are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring information and permitting the transfer of information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction. You consent to the transfer of your information to the United States and the use and disclosure of information about you and your end users, including personal information, as described in this Privacy Policy.

**Data Retention.** Subject to any mandatory obligations to delete data, your information may be retained by us and in our Third Party Agent portal, server logs, databases and records indefinitely.

**Third Party Links.** The Site may contain links to third-party websites ("Third Party Websites"). Please be aware that we are not responsible for the privacy practices of Third Party Websites. We encourage you to be aware when you leave the Site and to read the privacy policies of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by the Site.

**Your Employees.** Your acceptance of the terms of this Privacy Policy, in their entirety, shall extend to your employees, if any. You agree that any of your employees that access your Account, or visit the Site under the scope of their employment with you agree to the terms of this Privacy Policy.

**Minors.** We encourage parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children. We will never knowingly collect any personal information about individuals under eighteen (18) years of age. If we obtain actual knowledge that it we have collected personal information about an individual under eighteen (18) years of age, that information will be immediately deleted from its database.

**Security.** We endeavor to safeguard and protect our Account holders' information. When Account holders submit personally identifiable information to the Affiliate Network, their personally identifiable information is protected both online and offline. When our registration process asks registrants to submit Sensitive Information (such as bank account information and/or credit card information), and when we transmit such Sensitive Information, that Sensitive Information is encrypted and protected with SSL encryption software. While we use SSL encryption to protect Sensitive Information online, we protect all other user information online and offline. The Third Party Agent servers that we utilize to store personally identifiable information in are kept in a secure physical environment. The Third Party Agent has security measures in place to protect the loss, misuse and alteration of personally identifiable information stored on its servers.

Please be advised that, although we take every reasonable precaution available to protect your data, no data transmission over the Internet can be guaranteed to be 100% secure. Therefore, we cannot warrant that your information will be absolutely secure. Any transmission of data at or through our Site is at your own risk. However, access to your personally identifiable information is strictly limited, and not accessible to the public. Only employees, and third party agents, that need the information to perform a specific job are granted access to personally identifiable information. Our employees are dedicated to ensuring the security and privacy of all user information. Employees not adhering to our written firm policies are subject to disciplinary action. In compliance with applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your personally identifiable information. You will be notified via e-mail in the event of such a breach. Please be advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and to engage in remedial measures.

You acknowledge that you provide your personally identifiable information to us with knowledgeable consent and at your own risk.

**Deleting and Updating Your Information.** If you would like to delete or update the personally identifiable information that we have collected from you, simply email us at: .

We will process your request, where possible and subject to the terms and conditions contained herein, within a reasonable period of time after receipt. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access or making corrections.

**Opting Out of Receiving E-mail.** You may at any time choose to stop receiving emails containing general information regarding CPA Affiliates Network by following the instructions at the end of each such email or by contacting us at . Should you be contacted by our Third Party Agent through email, you can follow the instructions at the end of each such email to stop receiving such emails. There may be a short delay of up to several business days while your request is being verified, deployed and processed across our servers. Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your Account, as well as to respond to any inquiry or request made by you.

**Notification of Changes.** We reserve the right to change or update this Privacy Policy at any time by posting a clear and conspicuous notice on the Site explaining that we are changing our Privacy Policy. All

Privacy Policy changes will take effect immediately upon their posting on the Site. Please check the Site periodically for any changes. Your continued use of the Site and/or acceptance of our e-mail communications following the posting of changes to this Privacy Policy will constitute your acceptance of any and all changes.

**Contact Us.** If you have any questions regarding this Privacy Policy, or would like more information on our privacy practices, please contact us at: [support@cpaaffiliatesnetwork.com](mailto:support@cpaaffiliatesnetwork.com)

## **Exhibit A**

### **More about cookies on cpaaffiliatesnetwork.com**

Using cpaaffiliatesnetwork.com requires the use of cookies. If you do not want to accept the cookies for cpaaffiliatesnetwork.com or from any of our third parties, you won't be able to use our service.

We use a cookie to remember your cookie preferences this has a couple of consequences:

- If you delete all your cookies you will have to update your preferences with us again.
- If you use a different device, computer profile or browser you will have to tell us your preferences again.

The cookies used on cpaaffiliatesnetwork.com are based on the International Chamber of Commerce guide for cookie categories:

- Strictly necessary
- Performance
- Functionality

For more information about cookies see the Further Reading link below.

### **Strictly Necessary**

'Strictly Necessary' cookies let you move around the website and login to your secure account. **These cookies don't gather any information about you that could be used for marketing or remembering where you've been on the internet.**

### **We use these Strictly Necessary cookies to...**

- Identify you as being logged in to cpaaffiliatesnetwork.com
- Remember things like information you've entered on forms when you navigate to different pages in a single web browser session
- Help you use specific features like testing tracking links
- Make sure you connect to the right service on our website when we make any changes to the way the website works

### **'Strictly Necessary' cookies will NOT be used to...**

- Gather information that could be used to advertise products or services to you
- Remember your preferences or username beyond your current visit

**Accepting these cookies is a condition of using the website, so if you prevent these cookies we can't guarantee your security or predict how our website will perform during your visit.**

**Here is a list of the cookies we have defined as 'strictly necessary'.**

**cpaaffiliatesnetwork.com cookies:**

- PHPSESSID

**Cookies provided by 3rd parties:**

- CPA Affiliates Network does not currently employ any strictly necessary cookies by third parties

### **Performance**

'Performance' cookies collect information about how you use our website e.g. which pages you visit, and if you experience any errors. These cookies don't collect any information that could identify you – all the information collected is anonymous and is only used to help us improve how our website works, understand what interests our users and measure how effective our advertising is.

**We use performance cookies to...**

- Provide statistics on how our website is used
- See how effective our adverts are (we don't use this information to target adverts to you when you visit other websites)
- Provide feedback to partners that one of our visitors also visited their website. This can include details of any products bought. This lets our partners improve their website, but we don't allow our partners to reuse this information for further advertising
- Help us improve the website by measuring any errors that occur
- Test different designs of our website

**Cookies we have defined as 'Performance' cookies will NOT be used to...**

- Remember your preferences or username beyond your current visit

In some cases, some of these cookies are managed for us by third parties, but we don't allow the third party to use the cookies for any purpose other than those listed above.

**Using our site indicates that you accept the use of 'Performance' cookies.**

**Accepting these cookies is a condition of using the website, so if you prevent them we cannot guarantee how our site will perform for you.**

**Here is a list of the cookies we have defined as 'Performance'**

**cpaaffiliatesnetwork.com cookies**

- aff\_conversions
- \_\_utma
- \_\_utmb
- \_\_utmc
- \_\_utmz
- \_pmy\_visit
- \_pmy\_visitor
- is\_returning
- chartbeat2

**Cookies provided by 3rd parties**

- CPA Affiliates Network does not currently employ any performance cookies provided by third parties

### **Functionality**

'Functionality' cookies are used to provide services or to remember settings to improve your visit.

#### **We use 'Functionality' cookies to...**

- Remember settings you've applied such as layout, text size, preferences and colours
- Remember if we've already asked you if you want to fill in a survey
- Provide proactive live chat sessions to offer you support or submit a trouble ticket
- Show you when you're logged in to the website
- Share information with partners to provide a service on our website. The information shared is only to be used to provide the service, product or function and not for any other purpose

#### **Cookies defined as 'Functionality' will not be used to...**

- Target you with adverts on other websites

Some of these cookies are managed for us by third parties - where this is the case we don't allow the third party to use the cookies for any purpose other than those listed above.

**You can control whether or not these cookies are used, but preventing them may mean we can't offer you some services, and will reduce the support we can offer you.** It's also possible that preventing these cookie stops us remembering that you didn't want a specific service.

#### **Here is a list of the cookies we have defined as 'Functionality'.**

- app\_user
- swidth

#### **Cookies provided by 3rd parties**

Cookie	Host
edition	.hasoffers.com
network_id	.hasoffers.com
networkname	.hasoffers.com
networkurl	.hasoffers.com
__lc.serverchat1c	.livechatinc.com

### **Further Reading**

Useful information about cookies can be found at:

- **All about cookies** : <http://www.allaboutcookies.org>

- **Internet Advertising Bureau** - A guide to behavioral advertising and online privacy has been produced by the internet advertising industry which can be found at: <http://www.youronlinechoices.eu>
- **International Chamber of Commerce United Kingdom** - Information on the icc (uk) uk cookie guide can be found on the icc website section: <http://www.international-chamber.co.uk/our-expertise/digitaleconomy>