

Privacy Statement

Last Updated June 17, 2017

Protection of personal privacy has always been a hallmark of SAGESPRING ASSOCIATES. Since its inception in 2008, Sagespring Associates has maintained the anonymity of each survey respondent unless an individual user consents to the release of the user's Personal Information or individual results. In a similar manner, Sagespring Associates protects the identity of individuals who access Sagespring Associates Websites. For the purposes of this Privacy Statement, the terms "SAGESPRING ASSOCIATES, we, us, and our" refer to Sagespring Associates LLC, 4136 Del Rey Avenue, Marina del Rey, CA 90292. For questions about this Privacy Statement or your Personal Information, please contact us.

This statement describes the types of information, including Personal Information, collected and processed through Sagespring Associates websites and through the services delivered via Sagespring Associates websites, and how Sagespring Associates treats such information.

Personal Information

By using the term "**Personal Information**" in our Privacy Statement, we refer to information that you individually provide to Sagespring Associates either directly or indirectly that on its own or in combination with other information, can be used to identify you. Personal Information includes your name, your mailing address, your telephone number, and your e-mail-address, and may include other information that identifies you. Information that by itself cannot be used to identify you does not qualify as Personal Information. This includes but is not limited to your age, your gender, or other preferences.

I. INFORMATION COLLECTED BY SAGESPRING ASSOCIATES WEBSITES

Sagespring Associates websites gather information in two ways: (1) indirectly (for example, through our site's technology), and (2) directly (for example, when you, the site visitor, voluntarily provide information on various pages).

1. Information Collected Indirectly

Sagespring Associates indirectly collects a variety of information pertaining to use of our websites.

1.1. Tracking Data

Website traffic volume and patterns, such as the number of visitors to a given website or page on a daily basis is typically referred to as **Tracking Data**. This type of indirectly collected information is gathered through various means, such as an IP address, which is a number that is automatically assigned to your computer whenever you are surfing the Web. Web servers, the computers that "serve up" Web pages, automatically identify your computer by its IP address. When you visit any Sagespring Associates Websites, our servers log your computer's IP address.

To obtain these Tracking Data, Sagespring Associates uses third party analytics providers, including, but not limited to Google Analytics, a web analytics service provided by Google, Inc. (collectively "Third Party Analytics Providers"). The Third Party Analytics Providers use "cookies," which are text files placed on your computer, to help us analyze how users use Sagespring Associates websites. The information generated by the cookie about your use of Sagespring Associates websites, including your IP address, will be transmitted to and stored by Third Party Analytics Providers' servers. On behalf of SAGESPRING ASSOCIATES, the Third Party Analytics Providers will use this information for the purpose of evaluating your use of Sagespring Associates websites, compiling reports on website activity, and providing other services relating to website activity. The Third Party Analytics Providers will not associate your IP address with any other data held by them.

You can prevent Google Analytics' collection and use of data (cookies and IP address) by downloading and installing the browser plug-in. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address sent to and shortened by Google servers in the USA.

Further information can be found in the Google Analytics Terms of Service & Privacy.

Only designated administrators of Sagespring Associates can access the information gathered by Google Analytics, and the information is used only for administrative and planning purposes to meet the needs of our users, such as to improve the content of the site and to customize the content and/or layout of the site for individuals or groups of users.

1.2. Sagespring Associates Cookies

Other types of indirectly collected information are stored in "cookies." Cookies are small files of electronic information that a website can transfer to a visitor's hard drive to help that visitor while on the site. Some Sagespring Associates websites use cookies simply to store a user code so that the user does not have to re-enter their information when re-joining the site. The use of cookies is standard on the Internet. Although most Web browsers automatically accept cookies, the decision of whether to accept or not them is yours. You may adjust your browser settings to prevent the reception of cookies, or to

provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to access the full functionality of Sagespring Associates Websites. Cookies placed by Sagespring Associates will expire when the user terminates the website session or after a reasonable period of inactivity.

1.3. Third-Party Cookies

We may use third-party advertising companies to serve ads on our behalf. These companies may use cookies and action tags to measure advertising effectiveness. You can still decide whether you want to accept these cookies. You may adjust your browser settings to prevent the reception of third-party cookies, or to provide notification whenever such third-party cookies are sent to you.

2. Information Collected Directly

Sagespring Associates also collects Personal Information and other information that users voluntarily provide. It is entirely your decision to provide the requested information.

Sagespring Associates keeps all information directly collected confidential, and will only use the information to contact you. You may choose to have this information removed at any time. Sagespring Associates will never barter, trade, or sell access to our database of registered users.

2.1. User Account Data

When setting up an account on one of the Sagespring Associates Websites ("User Account"), you may be asked to provide personal information that could include: your name, e-mail address, and your phone number. If you choose to purchase any products, services, access codes or other items for sale by SAGESPRING ASSOCIATES, you will be asked to provide payment details and your full address for billing purposes.

As a customer/user of SAGESPRING ASSOCIATES, we may obtain personal information about you when you register to use one of our websites or services/products or when you provide feedback about our products or services. As a customer/user, we will use your personal information, unless otherwise prohibited by law, for the following purposes:

- To provide you with the products and services you request
- To communicate with you about your account or transactions with us and send you information about features on our sites or changes to our policies

Any User Account data will only be stored until you decide to terminate your User Account (see clause III.1. below). In case we are obliged to further store your Personal Information due to statutory retention requirements, your Personal Information will be barred for further use by Sagespring Associates and only be stored until such retention periods expire.

2.2. Other Personal Information Provided Directly

Other Personal Information provided by you on Sagespring Associates Websites, e.g. via contact forms, or via telephone will be stored in our service database and retained for the period necessary to fulfill the business need, unless a longer retention period is required by law.

II. DATA COLLECTION

Many Sagespring Associates websites offer users the opportunity to participate in surveys or assessments via the internet. You can find information about the purpose and process for each of these surveys or assessments on SAGESPRING ASSOCIATES's website.

1. Access to your Survey or Assessment Results from Another User Account

Another online user may purchase an access code to a Sagespring Associates survey or assessment for you. Please note that when participating in a survey or assessment, your results will also be accessible to the online user who purchased the Sagespring Associates access code. The data accessible to that account holder may include your name and your results, but will not include your specific answers to individual questions within the survey or assessment. In addition, the account holder cannot modify, alter, or delete any of your results or User Account data.

After completion of the survey or assessment, you will at all times have the opportunity to change the settings for sharing your results with other account holders.

2. Sharing your Survey Results with other people

After completion of the survey or assessment, you may have the opportunity share your survey or assessment results via e-mail, or social networks. Please note that only your name and results will be displayed. By sharing your information from your User Account with any social media service, you are authorizing us to share information we collect from and about you with the social media service provider, other users, and your network of contacts on the social media service, and you understand that the social media service's use of the shared information will be governed by the social media service's privacy policy. If you do not want your personal information shared in this way,

please do not connect your Sagespring Associates information to a social media service provider.

III. GENERAL INFORMATION ON COLLECTION AND PROCESSING OF INFORMATION

1. Correcting and Changing User Information and Preferences; Deletion of User Accounts

If you have given your consent to receiving e-mail communications from Sagespring Associates but wish to discontinue this service, you may request to do so at any time by contacting us. In addition, as a registered user, you can change your settings within your User Account under "MY ACCOUNT" by updating your "Contact Me" settings.

You also have the option at all times to have your User Account deleted for any of the Sagespring Associates websites or to request a revision of your user information at any time. To do so, please contact us.

2. Information Security

Sagespring Associates employees understand the need for user privacy, and we maintain strict security procedures to protect your information. Sagespring Associates has appointed a Privacy Policy Administrator to monitor privacy practices. Access to user data is strictly limited to specific individuals who are trained to respect user privacy. The access given to these employees is restricted to their need for such information for business purposes. A log of those who accessed the data is maintained and monitored to prevent security breaches.

3. Third-Party Information Storage

Some information may be stored for Sagespring Associates by authorized third-party companies. These companies are carefully selected by Sagespring Associates and only act on behalf of and as instructed by SAGESPRING ASSOCIATES. We limit such third parties in their access to and use of your personal information, and like SAGESPRING ASSOCIATES, they will never barter, trade, or sell access to your information.

4. Children and Privacy

Sagespring Associates encourages parents and guardians to spend time with their children online and to be fully familiar with the sites visited by their children. Sagespring Associates sites do not contain content that is generally considered unsuitable for children.

5. Links to Other Sites

Sagespring Associates websites may contain links to sites owned and/or operated by other organizations, and the privacy policies of those sites may differ from that of SAGESPRING ASSOCIATES. These sites may collect data and make use of it in ways that Sagespring Associates does not. We encourage you to review the privacy policies posted on all third-party sites.

6. Location of Data Collection and Processing

In personally accessing Sagespring Associates websites, you may be submitting Personal Information and survey or assessment results that Sagespring Associates will use for business purposes that are consistent with this Privacy Statement. As a worldwide organization, Sagespring Associates collects information that may be processed internationally throughout Sagespring Associates offices worldwide. Your information may be processed in the United States or any other country in which SAGESPRING ASSOCIATES, its affiliates, subsidiaries, or service providers maintain facilities.

7. Policy Updates

This Privacy Statement is SAGESPRING ASSOCIATES's promise to its websites users and Users with a registered User Account. Additional information that is particular to specific Sagespring Associates sites may exist, and updates to this policy may be posted. For these reasons, we suggest that users who may have specific concerns about the information being gathered and use of that information regularly view the Privacy Statement on each site. Sagespring Associates reserves the right to change the policy on use of information collected at any time.

8. Additional Questions or Comments

If you have any additional questions or comments regarding SAGESPRING ASSOCIATES's Privacy Policy, please contact us.