



InfoTrack Privacy Policy

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Introduction

InfoTrack USA, LLC ("InfoTrack") takes privacy and data protection issues seriously. This Privacy Policy (the "*Privacy Policy*") applies to the services offered by InfoTrack via the website(s) www.infotrack.com and search.infotrack.com (each a "*Site*" and collectively, the "*Sites*") and the services offered via the InfoTrack mobile applications available from time to time (collectively, "*App*"). It is designed to advise you how InfoTrack collects, uses, and protects your personal information. The Sites and App provide you with information and access to InfoTrack's products and services (the "*InfoTrack Services*"). By visiting any Site, downloading or using any App, or by using any Services, you are deemed to have accepted the terms of this Privacy Policy.

The Sites and App are controlled by InfoTrack USA, LLC, a New Jersey limited liability company, ("InfoTrack", "we", "us", "our").

As the InfoTrack Services evolve, we may revise this policy, so please check back frequently. If you have questions about InfoTrack's privacy practices please contact us at privacy@infotrack.com

Scope of this Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally identifiable information' (PII) is being used online. PII, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website. Capitalized terms have the same meanings as in our Terms of Service, incorporated herein by reference.

All users of the InfoTrack Services are adults over the age of 18, who are either completing a registration to participate themselves or are completing registration(s) for their minor children. Therefore, any references to a "registrant" or "user" in this Privacy Policy could refer to a minor child or to an adult, with the assumption that all data for any minor child is entered by the adult parent/guardian of that child. Please refer to the section of this Privacy Policy entitled "Policy for Minors" for more information.

What personal information do we collect from the people that visit our blog, website or app?

InfoTrack will only collect PII about you upon express prior notice, or if such information is expressly solicited and is voluntarily provided by you to InfoTrack. When providing support or registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, credit card information or other details to help you with your experience.

In addition, when you download or use Apps on your GPS-enabled mobile device and, where applicable, have requested or consented to location services, InfoTrack may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as search results, and other personalized content. Most mobile devices allow you to turn off location services. For more information about how to do this, please check your device settings.

When do we collect information?

We collect information from you when you register on our site, provide support, fill out a form or enter information on our site.

How do we use your information?

We may use the information we collect from you when you register, provide Support, surf the website, or use certain other site features in the following ways:

- To personalize User's experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To quickly process your transactions.
- To send periodic emails regarding our Services.

How do we protect visitor information?

The security and protection of your information is important to InfoTrack. InfoTrack implements a variety of security measures to maintain the safety of your personal information, both during its transmission and storage.

We do not store credit card or financial information on our servers.

The rest of the limited personal information we collect is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. InfoTrack assumes no responsibility or liability for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond InfoTrack's reasonable control.

We implement a variety of security measures when we provide support, or enter, submit, or access information to maintain the safety of your personal information.

Be advised that access to some Services and content on certain Sites may be password protected and may require a valid username. InfoTrack advises you to not disclose your username(s) or password(s) to anyone. It is important that you take individual precaution against unauthorized access to your password and to your device. Be sure to sign off when finished using a shared device. Except as specified in this Privacy Policy, we use commercially reasonable efforts to limit access to your Personal Information to only the InfoTrack employees, agents, and officers who require the information in the performance of their work-related duties.

All financial transactions are processed through a trusted financial provider (e.g. Google Wallet, Pay Pal) and are not stored or processed on our servers.

Do we use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process your transactions. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. All User-related information gathered by our cookies is encrypted.

An anonymous identifier is a random string of characters that is used for the same purposes as a cookie on platforms, including certain mobile devices, where cookie technology is not available. We do not link the information we store in cookies or anonymous identifiers to any PII.

We use cookies to:

- Understand and save User's preferences for future visits.

- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third party services that track this information on our behalf.

Our partners, affiliates, tracking utility companies, service providers may use session cookies to make it easier for you to navigate the Sites and App related Services. In addition, some of the advertisements you see on the Sites and App are delivered by third parties who also collect information through cookies, web beacons, and other technologies about your online activities on this and other websites, in an effort to understand your interests and deliver to you advertisements that are tailored to your interests. These third parties also may use information about your usage of the Sites and App and features within the Sites and App, to target and serve advertisements to you and to analyze the delivery of advertisements on the Sites and App.

The use of cookies by our partners, affiliates, tracking utility company, and service providers is not covered by this Privacy Policy. We do not have access or control over these cookies.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies.

If Users disable cookies in their browser:

If you disable cookies off, some features will be disabled. It will turn off some of the features that make your site experience more efficient and some of our services will not function properly.

Third Party Disclosure

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice. This does not include website hosting partners and approved services providers and other parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

However, non-personally identifiable visitor information, such as anonymized, aggregated data and demographic information, may be provided to other parties for marketing, advertising, or other uses.

InfoTrack may also transfer your PII to any of its assigns and successors in interest, or to any of its direct or indirect corporate subsidiaries, parent or other affiliate under common control, with, such party, subject at all times however, to the terms of this Privacy Policy. If InfoTrack is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Website of any change in ownership. Further, InfoTrack may transfer, or otherwise provide access to, your personal information to such acquirer or buyer involved in the merger, acquisition or sale.

We reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our web site.

We partner with a third party to either display advertising on our website or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this website and other websites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by emailing privacy@infotrack.com

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the

content and activities of these linked sites. We suggest you check the respective privacy policies and practices of any such third parties. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Policy for Minors

The InfoTrack Services are not directed to children under the age of 13, InfoTrack does not knowingly collect personal information from children under 13, as accounts are created and owned by adults over the age of 18, and any required information regarding children is entered by the adult account owner. This policy is reinforced by the InfoTrack Terms of Use and to by all registrants during account creation. Children should always ask parents for permission before providing any PII online. No information should be submitted to or posted on this site by any minor (a user under 18 years of age) without the consent of a parent or guardian. If you are aware that your child has provided us Personal Information without your consent, please contact us at privacy@infotrack.com

Links to 3rd Party Sites

Our website includes links to other websites whose privacy practices may differ from those of InfoTrack. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Data Retention

Unless otherwise specified herein, we will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at support@siplay.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Updating/Correcting Personal Information

For InfoTrack Services account holders and end users, PII collected (e.g. name, address, phone numbers, etc.) can be updated, deleted or modified by logging into your InfoTrack account or contact us at helpdesk@infotrack.com

In the event that you establish the personal information we hold about you is inaccurate, incomplete, or outdated, we would appreciate you bringing this information to our attention.

California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. - See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

According to CalOPPA we agree to the following:

Users can visit our site anonymously.

Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our website.

Our Privacy Policy link includes the word 'Privacy', and can be easily be found on the page specified above.

Users will be notified of any privacy policy changes:

- On our Privacy Policy Page

Users are able to change their personal information:

- By logging in to their account

How does our site handle do not track signals?

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third party behavioral tracking?

It's also important to note that we do not allow third party behavioral tracking

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13.

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify the Users via email

- Within 7 business days

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

Changes to this Privacy Policy

InfoTrack reserves the right to modify or amend this Privacy Policy at any time and for any reason. The amended Terms shall automatically become effective immediately after they are posted. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the InfoTrack Services after the posting of the amended terms on the InfoTrack Services constitutes your affirmative agreement to the revised Privacy Policy. If you have additional questions about this Policy, please contact privacy@infotrack.com