

## GREATER READING CHAMBER

### INTERNET PRIVACY POLICY

**1. Introduction.** The Greater Reading Chamber of Commerce (the "Chamber") publishes its information services in print and various electronic media, including Web-based formats as well as allowing people access to blogs. We are continually adapting to changes in technology to bring you the information you rely on faster and more efficiently than ever before.

The Chamber publishes this Privacy Policy to reaffirm our commitment to maintaining the privacy of our customers in the electronic environment and inform you of our practices concerning the collection and use of information you provide us.

In this Privacy Policy you will find a description of the policies and procedures that make this Privacy Policy work for them. We have included in this Privacy Policy an explanation of our information practices, such as:

- What information we collect
- How we collect the information
- How we use the information
- How we provide choice to Users about how we use the information we collect
- Whether we disclose the information we collect to third parties
- Whether third parties collect information through our Products

The Chamber reserves the right to make changes to any part of this Privacy Policy in its sole discretion, at any time and without prior notice. Continued use of any Product following any such change will constitute acceptance of those changes. If we decide to revise this Privacy Policy, we will post changes in the Products so Users are aware of our information practices. To continue to stay informed about this important issue, please check this Privacy Policy frequently.

This Privacy Policy applies to all Customers and Users (collectively referred to as "Users"). In addition, this Privacy Policy applies to all Products.

To make this Privacy Policy as easy to read as possible, CHAMBER has simplified certain sentences by substituting defined terms for certain concepts. Accordingly, the capitalized terms used throughout this Privacy Policy shall have the meanings assigned to such terms in Section 9 ("Definitions") of this Privacy Policy.

**2. The Chamber 's Privacy Pledge.** Chamber makes the following pledge to you:

- The Chamber is committed to protecting the privacy of Users at all times.
- The Chamber only shares Customer Information and other Personally Identifiable Information with third parties as described in Sections 5 and 7 in this Privacy Policy.
- The Chamber maintains security standards and procedures designed to protect Customer Information and other Personally Identifiable Information. We will continue to test and update our technology to improve our ability to protect Customer Information and other Personally Identifiable Information.

**3. Consent To Use Information.** By using any Product and/or by affirmatively accepting the License Agreement or this Privacy Policy, each User consents to the collection and use of all information that the User provides to Chamber, all information that is provided to Chamber on behalf of that User, and all information that Chamber collects based on that User's use of the Products, including, without limitation, all Customer Information and other Personally Identifiable Information.

**4. Our Policies Regarding the Collection of Information.** At the Chamber, our goal is to provide Users with quality information, products, and services. We are also committed to providing Users with responsive, personalized service, and keeping Users informed about new information, products, and services that may be of immediate interest to Users or that can help Users derive the greatest value from the Products.

Customer Information is at the heart of our ability to provide superior service to Users. We describe in this Privacy Policy the types of Customer Information and other Personally Identifiable Information that we collect, and how and why we may share that Customer Information and other Personally Identifiable Information with others.

A visitor who browses the Chamber Web site is not required to reveal any Personally Identifiable Information, such as name, address, or telephone number, unless subscribing to a product. Nor is such information collected passively by electronic means. The Chamber Web servers collect other information such as the make of a visitor's browser software and the Internet domain name of the location from which the visitor enters. This information helps us diagnose technical problems and manage our sites by tracking user interests.

The primary reason that we collect and maintain Customer Information and other Personally Identifiable Information is to serve Users and administer our customer relationships. The Chamber may collect Customer Information and other Personally Identifiable Information from a variety of sources, such as the following:

- Information Users provide to us, such as information Users provide to us in the registration process.
- Information we receive from a Customer that purchases Subscriptions for Users, such as registration information.
- Information about transactions by Users as part of the Products or other User experiences with The Chamber, such as the information we receive when a User submits a question through a search box in a Product. We collect Customer Information and other Personally Identifiable Information in a number of ways, such as the following:
  - Registration Process:
    - In order to use our Products, each User may be asked to complete a registration process, which requires providing certain registration information to The Chamber.
  - Credit Cards:
    - We collect credit card information for billing purposes. For convenience of our customers, we do not store, use, or share credit card information for any other purpose
  - Log Files:
    - We track information about each User's usage of the Products in log files. We use this information as follows:
      - To analyze trends
      - To administer the Products
      - To track statistical information about how Users use the Products
      - To gather broad demographic information for aggregate use
    - The Chamber does link information regarding a User's usage of the Products to the User's Personally Identifiable Information
  - Cookies:
    - Use of Cookies Generally:
      - A cookie is a piece of data stored by each User's browser that contains information about the user of a computer. Cookies help Web sites recognize return visitors. When you return to a Web site you visited before and that Web site uses cookies, your browser gives this data back to the Web site's server.
      - Contrary to reports about cookies and online privacy, cookies do not contain viruses and most cannot reveal any Personally Identifiable Information about you unless you willingly provide it as a user on a Web site.

- You will find that cookies are an industry standard and are used at most major Web sites in much the same way we use them here at The Chamber. You can learn most everything there is to know about cookies at [www.cookiecentral.com](http://www.cookiecentral.com). We also encourage you to read the privacy policies of all Web sites you visit before you accept cookies from these Web sites.
    - You can set your browser to reject or to accept cookies. You have the option to reject cookies when you are just browsing the Web and accept cookies when you want to use the Products.
  - The Chamber 's Use of Cookies:
    - Each Product places a cookie on the hard drive of each User's computer. If a User rejects any cookie offered by a Product, that User may not use the features of the Product.
    - The Chamber stores your User ID in your cookie.
    - The Chamber uses your cookie to make your experience with the Products more efficient and effective. For instance, by setting a cookie for a Product on a User's hard drive, the User does not have to log in to the Product more than once, which saves time.
    - Setting cookies also enables CHAMBER to track and target the interests of Users.
  - Surveys and Promotional Activities:
    - From time to time The Chamber may request information from Users via voluntary participation in promotional or market research activities.
    - The information that we request may include contact information (such as name and business address), and demographic information (such as zip code and age level).

## 5. Our Policies Regarding the Use and Disclosure of Information.

a) **Information Use and Sharing.** We may use and share the Customer Information and other Personally Identifiable Information that we collect among various departments within The Chamber and its subsidiaries that perform functions such as servicing User accounts, preparing reports regarding Product use, market research, and promotional activities. The reasons that we share this Customer Information and other Personally Identifiable Information include the following:

- To protect Users.
  - We use the Customer Information and other Personally Identifiable Information we maintain about Users and their use of the Products, including registration information, as follows:
    - To help us identify Users.
    - To help us prevent unauthorized persons from accessing Customer Information and other Personally Identifiable Information and the Product features that we make available to specific Users for their use.
- To provide superior service.
  - We use Customer Information and other Personally Identifiable Information to respond quickly and efficiently to User needs.
- To tell you about new or enhanced services and/or products.
- By understanding more about Users and their use of the Products, we can better meet User needs and determine how other Product features could be of value to Users.
- E-mail Updates:
  - Once a User completes the registration process, The Chamber may keep the User updated by e-mail on important news and events concerning The Chamber, Product features, and other information that The Chamber deems relevant.
  - By accepting the License Agreement and this Privacy Policy and by using any Product, each User agrees that The Chamber may contact the User by

- e-mail with respect to The Chamber and any aspect of the Products whatsoever.
- o To improve and develop our information, products and services.
  - o Every Product feature that we offer is designed to reflect the ways Users actually use the Products.
    - We collect and analyze information about Product use so that we can tailor new types of information, products and services to meet User needs.
    - When it comes to sharing Customer Information and other Personally Identifiable Information outside The Chamber, we do so only for specific purposes. We share Customer Information and other Personally Identifiable Information with third parties as follows:
  - o General
    - We reserve the right to share with The Chamber subsidiaries and/or other reputable organizations the following information, for purposes of permitting those organizations to sell their products and services to our Customers:
    - With respect to each Customer, the following current information: company name, industry, business mailing address, and primary contact information (name, e-mail address, street address, mailing address, and telephone number).
    - With respect to each User, the following current information: name, industry, job title, business e-mail address, office name (branch and main office), and mailing address.
    - We reserve the right to share Customer Information and other Personally Identifiable Information with third parties that provide hot links to the Chamber Web page at <http://www.greaterreadingchamber.org> to promote the Products, such as web portals, or otherwise sell Subscriptions on our behalf through their own marketing channels. In certain instances, these parties will co-own certain Customer Information and other Personally Identifiable Information about Product revenue generating activity that originates from that third party. Such Customer Information and other Personally Identifiable Information may include, without limitation, the following information: company name, street address, e-mail address, contact name, lead date, first sale date, and services accessed.
    - We reserve the right to share Customer Information and other Personally Identifiable Information with other third parties that perform services on our behalf, such as companies that help us market Products, renew subscriptions, or assist new customers.
    - We reserve the right to share all Customer Information and Personally Identifiable Information with third parties who act as independent contractors to help us administer the Products, such as data centers that host our servers and technical system consultants who program our hardware and Software.
    - We reserve the right to share Customer Information and Non-Identifying Information in the form of aggregated demographic information that is not linked to Personally Identifiable Information with our subsidiaries, advertisers, and other third parties.
    - We reserve the right to disclose certain Customer Information and Personally Identifiable Information to government agencies and consumer reporting agencies as permitted or required by applicable law. The Chamber may make these disclosures for specific, limited purposes, such as verifying individuals' identities (reducing fraud and identity theft).
    - The Chamber will also disclose a User's Customer Information and Personally Identifiable Information when and to the extent we believe, in good faith, that we are legally compelled to do so pursuant to an order of a court of competent jurisdiction or other governmental body (including, without limitation, such disclosures required by applicable securities laws as are necessary to comply therewith or with the rules and regulations of any applicable stock exchange). In such an event, the Chamber will use reasonable efforts to do the following:
      - Give the User reasonably prompt written notice of such requirement so that the User has an opportunity to comment thereon or object thereto

- and to preserve the confidential nature of the Customer Information and Personally Identifiable Information that the Chamber is required to disclose.
- At the User's expense, use commercially reasonable efforts to cooperate with any of the User's efforts to preserve the confidential nature of the Customer Information and Personally Identifiable Information that the Chamber is required to disclose.
- User Information
  - We reserve the right to share a User's Customer Information and Personally Identifiable Information with the Customer who purchased the User's Subscription.
  - We also reserve the right to share a User's Customer Information and other Personally Identifiable Information in the manner described in Section 6 of this Privacy Policy.
- Customer Information
  - We also reserve the right to share the aggregate Customer Information and other Personally Identifiable Information for any Customer with respect to all Users for which that Customer purchased a Subscription in the manner described in Section 6 of this Privacy Policy.

**b) Our Policies Regarding the Use and Disclosure of Information About Former Customers.** For a period of time after a Customer relationship ends, our policies and practices regarding the use and disclosure of Customer Information about former Customers are the same as those regarding the collection and disclosure of Customer Information and other Personally Identifiable Information about existing Customers. See the information under the heading in Section 6 of this Privacy Policy. However, after the relationship ends, we may use such Customer Information and other Personally Identifiable Information about former Customers less and less over time. We reserve the right to eventually remove such Customer Information and other Personally Identifiable Information about former Customers from our records.

**c) Links to Third Party Web Sites.** The Chamber Privacy Policy applies solely to the Products. The Products may contain links to Web sites owned and operated by third parties. Any User's use of third party Web sites is at their own risk and subject to any terms and conditions of use, policies regarding the collection of information, privacy policies, and other practices and procedures for such Web sites. The Chamber is not responsible for any such terms and conditions of use, policies regarding the collection of information, privacy policies, or other practices and procedures of the third party Web sites that a User may access through hot links in the Products. We cannot guarantee how these third parties use cookies or whether they place cookies on your computer that may include Customer Information and other Personally Identifiable Information. We encourage Users to be aware when they leave the Products and to read any terms and conditions of use, policies regarding the collection of information, privacy policies, and other practices and procedures of each Third Party Web site before Users provide them with any Customer Information and other Personally Identifiable Information.

**6. Information Confidentiality and Security.** The Chamber is committed to prevent any unauthorized access to each User's Customer Information and other Personally Identifiable Information. We maintain procedures and technology designed to prevent such unauthorized access.

**a) Security Programs.** No one can guarantee that data transmission over the Internet will be 100% secure. Nevertheless, The Chamber has taken technical, administrative, and physical steps to protect against unauthorized access to Customer Information and other Personally Identifiable Information used to administer its customer accounts. All such information is handled securely within the Chamber and is not disclosed to unauthorized third parties.

b) **User IDs and Passwords.** Each User is responsible for maintaining the confidentiality of his or her User ID and password, and are responsible for all Product activities that occur under his or her User ID and password, including, without limitation, all related Customer Information and other Personally Identifiable Information. Each User agrees to immediately notify the Chamber of any unauthorized use of his or her User ID or password or of his or her Customer Information and other Personally Identifiable Information or any other breach of security regarding the Products or his or her Customer Information and other Personally Identifiable Information. CHAMBER will not be liable for any Loss whatsoever arising from a User's failure to comply with these security requirements and each User agrees to hold CHAMBER harmless from any and all Losses that arise from that failure to so comply.

7. **Tips To Help You Protect Customer Information.** If any User suspects that someone has had unauthorized access to his or her the Chamber account, or access to his or her Customer Information and other Personally Identifiable Information, such as his or her User ID or password, the User should send an email to [info@greaterreadingchamber.org](mailto:info@greaterreadingchamber.org) immediately so we can take appropriate action to protect the User and his or her Customer Information and other Personally Identifiable Information.

In addition, Users may want to consider if it is important to report the crime to local law enforcement agencies and to the Federal Trade Commission (FTC). To speak with a trained FTC telephone counselor, call toll-free 1-877-IDTheft (1-877-438-4338). Or, to enter information about any complaint into a secure FTC online database, sign onto [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft). The site also provides links to numerous consumer education materials.

If you have any questions or concerns regarding the Chamber's data protection practices, please send an e-mail message to the Chamber's Web site administrator at [info@greaterreadingchamber.org](mailto:info@greaterreadingchamber.org).

8. **Definitions.** For all purposes of this Privacy Policy, the terms used throughout this Privacy Policy shall have the meanings set forth below:

- **"Customer Information"** means any information about a Customer, its employees, contractors, suppliers, licensors, agents, distributors, and others who have any business or personal relationship with such Customer, that (i) the Chamber has an obligation to keep confidential or use for limited purposes or (ii) the Chamber has any legal obligation to keep confidential or use for limited purposes, including under the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act, any laws regarding invasion of privacy, or other privacy laws. "Customer Information" does not include publicly available information.
- **"License Agreement"** means the License Agreement, as it may be amended from time to time. For all purposes, all references to the License Agreement include the Privacy Policy, the Copyright Guidelines, and any applicable Order Form.
- **"Non-Identifying Information"** means information that, taken alone, cannot be used to identify or locate a Person, including, without limitation, age or date of birth, gender, occupation, education, ZIP code with no address, interests, hobbies, types of hardware or Software used by a Person, income. "Non-Identifying Information" refers to this type of information, regardless of whether such information is collected along with, or is linked to, Personally Identifiable Information.
- **"Personally Identifiable Information"** means information that can be used to identify or locate a Person, including, but not limited to, e-mail address, name, street address, phone number, fax number, credit card number, Social Security number, and tax identification number.

- ***“Privacy Policy”*** means this “Privacy Policy” as it may be amended from time to time.
- The terms ***“we,” “us,”*** and other similar terms shall be deemed to refer to the Chamber, as appropriate.
- The terms ***“you,” “your,”*** and other similar terms shall be deemed to refer to Customer and all individual Users, as appropriate