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RAND-WHITNEY GROUP WEBSITE PRIVACY POLICY

This privacy policy is applicable to the Website[s] accessible at www.randwhitney.com (collectively the "Site"), which is operated by Rand Whitney Group, (the "PROVIDER", "we", "our", or "us"). The purpose of this privacy policy is to disclose to you what information we may collect, how we may collect it, with whom we may share it, and certain other matters related to such information, including the choices you have regarding our collection of information and our use and disclosure to other parties of information we may have collected from you.

When this privacy policy uses the term "personally identifiable information" or "personal information," we mean information that identifies a particular individual, such as your full name, street address or email address. When other information is associated with personal information, it also becomes personally identifiable information for the purposes of this privacy policy.

Please read the information below to learn more about our data collection policies and practices.

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TYPES OF INFORMATION THAT MAY BE COLLECTED

The following are the types of information we may collect:

Information You Provide Us

In the course of using the website, we may ask you to provide us with certain information, including contact information (such as your name, email address, or

phone number), unique identifiers (such as your user ID and password), or similar information.

Personal information that you provide to us, such as your user ID and password, name, email address, telephone number or other information, may be collected via the Site.

Site Usage Information

We may receive and store certain types of information whenever you visit the Site. For example, we may collect click-stream data and your IP address.

HOW INFORMATION MAY BE COLLECTED

We may collect information from you in several different areas on the Site, including but not limited to those described below:

Registration

You may be asked first to complete a registration form and provide personally identifiable information; you may also be asked to choose a user ID and password. Participation in registration is voluntary and you will have the opportunity to decide whether or not to disclose information to the Website.

Surveys or Voting

From time-to-time we may request personally identifiable information from you via surveys or voting polls. Participation is voluntary and you will have the opportunity to decide whether or not to disclose information. At times, you may have to register to vote or to take part in a survey.

Cookies

As with many Websites, our Website uses a technology called "cookies." A cookie is a unique, random number that is stored in the browser on your computer. The cookie doesn't actually identify you, just the computer that is used to visit the site. Cookies automatically identify your browser to the Website whenever your computer is used to visit the Website. Cookies also let us know how many people visit our website and where visitors go on the site. In addition, cookies can let us know non-personally identifiable information, like what web browser is being used to access the website. For registered users, cookies can make using the Website easier for you by saving information such as your passwords or preferences. By tracking how and when you use the Website, cookies help us determine which areas are popular and which are not. Many improvements and updates to the Website are based on data obtained from cookies. Accepting cookies allows you, among other things, to personalize your

experience on the Website. Cookies may also allow the Website to present to you advertising which may be of interest to you. If you do not want information collected through the use of cookies, your browser should contain an option that allows you to disable or delete cookie data at any time. Some areas of the Website, however, may not provide you with a personalized experience if you have disabled the use of cookies. This privacy statement covers the use of cookies by this Site.

IP Addresses and Click-stream Data

We may collect IP addresses and/or click-stream data for purposes of system administration. An IP address is a number that is automatically assigned to your computer whenever you access the Internet. Our computers identify your computer by its IP address. When you request Web pages from the Site, our computers log your IP address. Click-stream data is information collected by our computers when you request Web pages from the Site. Click-stream data may include such information as the page served, the time, the source of the request, the type of browser making the request, the preceding page view and other such non-personal information. When analyzed, this data helps us analyze how visitors arrive at the Site, what type of content is most popular, what type of visitors in the aggregate are interested in particular kinds of content and advertising, and the like.

HOW WE USE THE INFORMATION COLLECTED

We own the information collected via this Site. As applicable, the information you provide to us may be used to:

- contact you about the Site;
- contact you relating to your membership status;
- confirm or fulfill an order you have made;
- monitor or improve the use of the Site;
- customize the content you see;
- monitor compliance with our terms and conditions of use of the Site;
- provide special offers to you from us.

WITH WHOM THE INFORMATION MAY BE SHARED

At times, we may share your personally identifiable information with others for various purposes. The following outlines the ways in which your information may

be shared with others. Except as expressly set forth below, Rand Whitney Group does not share, sell, rent or trade personally identifiable information with third parties for their promotional purposes.

Agents : We employ other businesses, certain services and individuals to perform functions on our behalf. Examples include fulfilling orders, sending e-mail, removing repetitive information from customer lists, Site analysis, analyzing data, providing marketing assistance, processing credit card payments, and providing customer service. These entities have access to personally identifiable information needed to perform their functions, but may not use it for other purposes.

Partners Subsidiaries and Affiliates: We may share your information (including, without limitation, personally identifiable information) with our subsidiaries and affiliates. If you do not want us to share your information with our subsidiaries and affiliates, you may tell us by sending an email to info@randwhitney.com with your request (please write "Affiliates" in the subject line of your email).

Business Transfers: In the event that all or substantially all of our assets are sold or transferred to another party, or another transaction occurs in which your personally identifiable information is one of the business assets transferred, all personally identifiable information that has been collected and saved may be one of the business assets we transfer.

Legal Process : In the event we are required to respond to subpoenas, court orders or other legal process your personally identifiable information may be disclosed pursuant to such subpoena, court order or legal process, which may be without notice to you.

LINKS TO OTHER WEB SITES

This privacy policy applies only to this Site. When you are on the Site you could be directed to other sites beyond our control. For example, if you "click" on a banner advertisement, the "click" may take you off the Site onto a different Web site. This includes links from advertisers, sponsors and others that may use the Site's logo as part of a cobranding agreement. These other Web sites may send their own cookies to you, independently collect data or solicit personal information and may or may not have their own published privacy policies. If you visit a Website that is linked to our Site, you should consult that site's privacy policy before providing any personal information.

SECURITY

This Site incorporates reasonable safeguards to protect the security, integrity, completeness, accuracy and privacy of the personal information that we may

collect and we have put into place reasonable precautions to protect such information from loss, misuse and alteration. Certain personally identifiable information is transferred to our computers utilizing encryption software. Only those employees who need access to your information in order to do their jobs are allowed access. Our security policies are reviewed periodically and revised as required.

A SPECIAL NOTE FOR PARENTS CONCERNING PRIVACY

The Site is a general audience site. We do not currently collect any personal information from children under the age of thirteen on the Site. We encourage you to visit the Direct Marketing Association's Web site (www.the-dma.org) and explore the Get CyberSavvy! program as well as the GetNetWise website (www.getnetwise.org) to learn more about parental control tools.

YOUR ACCEPTANCE OF THE PRIVACY POLICY AND NOTIFICATION OF CHANGES TO THE POLICY

By using this Website, you signify your agreement to the terms of our privacy policy. We may amend this privacy policy at any time. If we make a material change to the way in which we collect, use, and/or share your personal information, we will post a notice on our website and / or send an email to users who have provided an email address. We will assume that you have given your permission for your information to be used under the terms of the new privacy policy, if you do not respond to our email within thirty days or continue to use the Website thirty days after a notice is posted. Please note that you should always update your personal information to provide us with a current email address.

CORRECTION/UPDATING PERSONAL INFORMATION

If your personally identifiable information (such as your email address) changes, or if you no longer desire to access our Site, you may correct, update, remove, or delete the personal data you have provided to us by making changes to your profile, by using an opt out message in an email, or by emailing member Sites at info@randwhitney.com with your request. We will respond to your request within 14 days of receiving the request. If you have any questions about this privacy policy or the privacy practices of this Site, you can contact: Dave Fafard at dfafard@radwhitney.com.

QUESTIONS ABOUT THIS PRIVACY POLICY

If you have any questions about this privacy policy or the privacy practices of this Website, contact Dave Fafard at dfafard@radwhitney.com.

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