

## CRESTWOOD TECHNOLOGY GROUP PRIVACY POLICY

This policy applies to the collection, use, disclosure and protection of Personal Data, relating to customers of Crestwood Technology Group and all of its subsidiaries and related entities (“Crestwood”), suppliers of Crestwood, and website users. This policy is effective as of March 6, 2014.

“Personal Data” means information pertaining to specific individuals, or by which specific individuals can be identified, including by name, identification number, address, or other personal characteristics or attributes. Personal Data does not include aggregated statistics, compilations, anonymous data, or other derivative data that does not, alone or with other data, identify a specific individual. “Data Subject” means an individual who is the subject of personal data.

### **Basic Principles**

Crestwood will not collect or maintain Personal Data that is not relevant to or not required for the conduct of the Crestwood business and will take reasonable steps to assure that Personal Data remains accurate.

Personal Data will be treated as confidential, and sufficient internal procedures and controls will be employed to prevent unauthorized access, disclosure, use, copying, modification, destruction. Personal Data maintained by Crestwood will not be used for purposes that are incompatible with the purposes for which it was collected. Personal Data will not be transferred to third parties, except as required for the conduct of the Crestwood business, and only to third parties who have agreed in writing to protect the privacy of Personal Data.

### **On-line Registration**

**If you decide to register with a Crestwood web site, you will be asked to provide your name, company, country, email, and job type. Crestwood uses the information that you provide to us during registration to enhance your experience. This may include presenting promotional offers online or via email with your consent or in accordance with applicable law, tailored to your previous purchases. Crestwood does this to try and make your experience with us more productive and efficient.**

**Personal Data Accuracy and Completeness:** Crestwood endeavors to maintain Personal Data accurately and relies on its customers, suppliers, and other third persons who give Crestwood Personal Data, to ensure that the Personal Data they provide to us is complete and accurate, and to notify us of updates and changes to Personal Data as required from time to time.

**Updating Personal Data:** If you would like to modify or delete the Personal Data held on your profile, please you may change your mind at any time by writing to or emailing us at [service@ctgnow.com](mailto:service@ctgnow.com).

## Opting Out Of Email Communications with Crestwood

You can choose not to receive emails from Crestwood at any time by simply sending an email, including your name and email address, to [service@ctgnow.com](mailto:service@ctgnow.com).

Crestwood will treat all Personal Data in our possession as confidential, and maintain internal procedures and controls designed to prevent unauthorized or unlawful processing of data and against accidental loss or, destruction of, or damage to, Personal Data.

## Security

Personal Data in Crestwood's custody or control is protected by appropriate technology, policies and procedures designed to prevent unauthorized use, access, disclosure, modification, copying or destruction and to maintain the integrity, availability and privacy of Personal Data.

Crestwood will only process Personal Data fairly and lawfully and will not use Personal Data in Crestwood's possession for purposes that are incompatible with the purposes for which Crestwood receives the Personal Data.

Crestwood uses the Personal Data that Crestwood collects about you: to process orders; to help us to improve our site and your online experience; to provide you with information about our products and services; for ordering, customer support, payment, processing and service purposes; to transact business with us; for credit checks, collections and related billing or credit purposes; and as otherwise allowed by law.

**Online Ordering: If you place an order online, we need to know your name, email address, mailing address, credit card number, and the credit card's expiration date. We may also ask you for certain credit history and tax information. This allows us to process and fulfill your orders and keep you up-to-date on the status of your order.**

**Literature Requests, Samples, Software Downloads: When you request literature, a free sample offer, or a free software download, we may ask for your name, address, and email address so we can fulfill your request. In some cases, the collection of additional information may be required as part of the offer.**

Contests, Surveys, & Online Polls: Crestwood occasionally conducts surveys, polls or holds contests on Crestwood sites. While these activities are voluntary, it often requires us to request information from you if you choose to participate. The poll results are gathered and displayed to other site users to show your peers' viewpoints on topical information. The contest information will be used to administer the contest and notify the contest winners, unless otherwise stated at the time of entry.

Emails, Including Special Offers & Site Updates: If you are registered with a Crestwood site, Crestwood will occasionally send you emails about various products and services that we feel

may be of interest to you and/or about site features and changes that we feel you'll want to know about. You can choose not to receive email from Crestwood at any time (see opt out of emails above) and only Crestwood (or agents working on behalf of Crestwood) will send you these direct mailings.

## **Cookies**

Crestwood may also collect Personal Data concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are files that websites place on users' computers to identify the user and enhance the website experience. Internet browsers can generally be set to warn you if cookies are used and whether you wish to accept them. Turning off cookies will not prohibit you from using Crestwood web sites, it may however limit your use of the sites.

Crestwood will not transfer Personal Data to third parties, except as required in our business, and provided those third parties preserve the confidentiality and maintain appropriate security of Personal Data and use it only for the purposes provided.

## **Third Parties**

Crestwood maintains collaborative relationships with vendors, subcontractors, strategic partners, and others who assist Crestwood and our customers in the conduct of our respective businesses. From time to time Crestwood may transfer Personal Data to these parties to enable them to work with Crestwood, but Crestwood requires that they maintain the privacy of Personal Data in a manner satisfactory to Crestwood and consistent with applicable law.

Crestwood will ensure that whenever Personal Data is transferred to foreign countries, it will remain adequately protected.

It is Crestwood's policy not to transfer Personal Data to any entity, individual, or organization located in countries that do not provide an adequate level of data protection, unless:

- You have given your consent;
- The transfers are needed to enter into or perform a contract with you;
- The transfers are needed for the conclusion or performance of a contract concluded in your interest;
- The transfers are made pursuant to approved written contracts or a set of binding corporate rules which protect your rights; or
- The transfers are permitted under applicable law.

Personal information transferred to another country may be subject to all the laws of that country, including laws related to national security and anti-terrorism, which may permit law enforcement or regulatory agencies to obtain access to information held by private businesses. Crestwood will deal fairly with each person whose Personal Data is in Crestwood's custody or control.

**Access:** Upon reasonable written request, Crestwood will inform any person what Personal Data Crestwood has about him or her, the purposes for which it is processed, the recipients or categories of recipients and whether any automatic processing takes place. Crestwood will take steps to correct or delete any inaccuracies in Personal Data pointed out to us, either directly or through making available self-service mechanisms. Crestwood will endeavor to notify recipients of your Personal Data of such changes where required.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to the address below.

Crestwood Technology Group  
Attn: Customer Service  
1 Odell Plaza Suite 139  
Yonkers, NY 10701

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

However, Crestwood may limit access, corrections, or deletions as permitted or required by applicable laws or regulations. Crestwood may establish reasonable rules for providing access to Personal Data, including procedures and fees for responding to Access Requests.

**Enforcement:** Persons who have questions or believe their Personal Data is not handled in accordance with this Privacy Policy should contact the Company's privacy official at Crestwood using [service@ctgnow.com](mailto:service@ctgnow.com) who will review the issue in an effort to resolve the issue quickly and amicably.

### **Legal Requirements**

- This Privacy Policy is issued by Crestwood and applies exclusively to facilities of Crestwood and its subsidiaries and related entities.
- Crestwood may change this Privacy Policy from time to time as it deems appropriate. This Policy is made public on our website and is current as at the date written above.
- This policy is designed to comply with the Safe Harbor Privacy Principles as set forth by the U.S. Department of Commerce in consultation with the European Commission that are available to U.S. companies under the European Commission's directive on data protection. As Crestwood is a U.S. company, it has voluntarily decided to comply with the U.S.-EU Safe Harbor Framework and certify its adherence to the Safe Harbor Privacy Principles. To learn more about the Safe Harbor program, and to view Crestwood's certification, please visit <http://www.export.gov/safeharbor/>
- This document describes Crestwood's privacy policy. However, this policy does not grant or create any additional rights or remedies for the Data Subjects or any additional obligations on the part of Crestwood other than those obligations required by applicable law, including the U.S.-EU Safe Harbor Framework.