

Vormittag Associates Inc.

Privacy Policy

Vormittag Associates Inc. ("VAI" or the "Company") regards its customers' privacy as one of its most important values. The Company wants you to know how it protects the information of Company customers who make use of the services and products offered through this website (the "Company Website"). This privacy policy only applies to VAI. This policy does not apply to the practices of companies that VAI does not own or control or to people that VAI does not employ or manage.

ELECTRONIC SERVICE REGISTRATION.

When you register to receive a product or information through the Company Website ("Registered User"), you will be prompted to provide certain information that identifies you ("Personal Information") or allows the Company to contact you. Such Personal Information may be merged with any information you have already provided to the Company (the "Personal Profile"). If you have not previously registered with the Company, a Personal Profile will be created for you from your electronic registration information.

CUSTOMER PROFILES.

Every Registered User has a unique Personal Profile. Each Personal Profile is assigned a unique personal identification number, which helps ensure that only you can access your profile.

PRIVACY.

U.S. - EU Safe Harbor Privacy Statement.

For personal information of employees and customers that VAI receives from the European Economic Area, VAI has committed to handling such personal information in accordance with the Safe Harbor Principles. VAI's Safe Harbor certification can be found at <http://web.ita.doc.gov/safeharbor/shlist.nsf/webPages/safe+harbor+list>. For more information about the Safe Harbor Principles and the FAQs, please visit the U.S. Department of Commerce's Website at <http://export.gov/safeharbor/>.

To protect your privacy when you browse and/or make use of the services provided through the Company Website, the Company follows certain basic rules:

- Notice. Generally, Personal Information is requested when: (i) existing Company customers register to use the customer portal area of the Company Website (the "Customer Portal"); and (ii) visitors to the Company Website request certain information about Company information, products and/or services. Although the Terms of Use governing (i) and (ii) above may vary, the Company uses your Personal Information in all three situations generally for the same purposes:

- To make the Company Website easier to use by not having to enter information more than once;
- To find services or information quicker;
- To create relevant content;
- To distribute alerts concerning product upgrades, special offers, updated information and other new services and products from Company; and
- To share relevant information with affiliates, or third-parties.

PLEASE NOTE THAT COMPANY CUSTOMERS WHO ARE AUTHORIZED TO USE THE CUSTOMER PORTAL ARE SUBJECT TO AN ADDITIONAL TERMS OF USE POLICY WHICH GOVERNS THE USE THEREOF.

- Consent/Choice. If you choose not to provide Personal Information, then you can still browse and/or use many areas of the Company Website, but you will not be able to access certain areas that are restricted to specific users.

The Company will share Personal Information to facilitate transactions, or to comply with valid legal process such as a search warrant, subpoena or court order. The Company will also share Personal Information to establish or exercise its legal rights or defend against legal claims. The Company may share statistical, aggregate, non-personally identifiable data with third parties in order to permit third parties to provide non-targeted marketing offers to you. If you do not want the Company to communicate with you about other offers regarding Company products, programs, events, or services by e-mail, postal mail, or telephone, or if you do not want to receive affiliate, partner or third-party offers, you may contact the Company at <http://www.vai.net/contact.html>.

Please note that the Company does not control the privacy policies or data sharing practices of the third parties who provide such products or services. Such third parties may have privacy terms that differ from this privacy policy, and they may share Personal Information differently than this Company Privacy Policy permits.

- Access. The Company will provide you with the means to ensure that your Personal Information is correct and current. You may review and update this information at any time by contacting the Company at <http://www.vai.net/contact.html>.
- Data Integrity/Security. The Company collects Personal Information that is relevant for the purpose for which it is to be used and the Company will take reasonable precautions to ensure that such data is appropriate for its intended use. Additionally, the Company takes precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.
- Enforcement. If for some reason you believe the Company has not adhered to these rules, please notify us by e-mail at <http://www.vai.net/contact.html>, and the Company will do its best to determine and correct the problem promptly. Be certain the words Privacy Policy are in the Subject line.

EDIT OR DELETION OF PERSONAL INFORMATION.

You can edit or delete your Personal Information at any time by emailing to webmaster@vai.net. Certain information, however, may possibly remain in VAI's archived records after your Personal Information has been deleted.

When you register with VAI, a temporary copy of your Personal Information is routinely made to prevent accidental loss of your information through a computer malfunction or human error. VAI keeps your Personal Information active in its user registration databases in order to provide immediate access to your personalization preferences each time you visit the Company's website. If you delete your Personal Information, in most cases it will be deleted from the Company's registration databases in approximately 90 days. This delay is necessary to discourage users from engaging in fraudulent activity. Any information that the Company has copied may remain in back-up storage for some period of time after your deletion request. This may be the case even though none of your Personal Information remains in the Company's active user databases.

CHANGES TO THIS PRIVACY POLICY.

VAI may update this policy at any time. The Company will notify you about significant changes in the way it treats Personal Information by, at its sole discretion, either sending a notice to the primary email address specified in your Personal Profile or by placing a prominent notice on the Company's website.

QUESTIONS AND SUGGESTIONS.

If you have questions or suggestions, please contact us at:

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800.824.9500

Effective Date: May 1, 2009