



cerule<sup>®</sup>

## 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 described 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 **Cerule**<sup>™</sup> LLC ("Cerule") and any of its present or future subsidiaries collect, use, protect or otherwise handle your PPI in accordance with our website. This Policy does not apply to information collected by Cerule by or through any other means, such as information collected offline.

### **What personal information do we collect from our blog, website or app?**

When ordering or registering on our site you may be asked to enter your name, email address, postal address (including billing and shipping addresses), phone number, credit card information, social security number or other details. We recognize the confidential nature of the Personal Information in its care and is accountable for the compliance of itself and its directors, officers, management, employees, representatives and agents including consultants and independent contractors in protecting this Personal Information.

### **When do we collect information?**

We collect information from you when you register on our site, place an order, subscribe to a newsletter, open a Support Ticket, enter information on our site or provide us with feedback on our products or services

### **How do we use your information?**

We may use the information we collect from you in the following ways:

- to quickly process your transactions.
- to send periodic emails regarding your order or other products and services.
- to tell you about our operations, services, and programs;
- to allow you to use, communicate and interact with others on our website; and
- for our internal business purposes, such as data analysis, audits, enhancing our website, improving our services and identifying usage trends.

We may disclose your PII:

- to affiliated companies but not for direct marketing purposes;
- to third-party service providers who provide services to us, such as web site hosting, data analysis, payment processing, order fulfillment, infrastructure provision, information technology services, customer service, e-mail delivery services, credit card processing, auditing, training, and other similar services for the purpose of providing these services to us or on our behalf;
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and
- we may provide PII in response to a court order, subpoena, or government investigation. We also

reserve the right to report to law enforcement agencies any activities that we believe to be unlawful or suspicious. We may release Personal Information when we believe that such release is reasonably necessary to enforce or apply our Terms of Use or to protect the interests, rights, property, and safety of others and ourselves.

We may also collect **Non-Personal Information which** does not reveal your specific identity, such as:

- browser information
- information collected through cookies, pixel tags and other technologies
- demographic information and other information provided by you

For example, Cerule

- collects information such as your computer type (Windows or Macintosh), screen resolution, operating system version and Internet browser type and version and your demographic information. This information does not personally identify you to anyone else.
- may aggregate PII so that the aggregated information does not personally identify you to anyone else.

Your PII may be stored and processed in any country where we have operations, and by interacting with us and providing us with any PII, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may provide for different data protection rules than in your country

### **How do we protect your information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular Malware Scanning.

Your personal information 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.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider 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 the items in your shopping cart. 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.

### **We use cookies to:**

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.

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 settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some features will be disabled. It won't affect the user's experience that make your site experience more efficient and may not function properly.

However, you will still be able to place orders.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when it's 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 may be provided to other parties for marketing, advertising, or other uses.

### **Third-party links**

We do not include or offer third-party products or services on our website.

### **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our site but we may do so in the future.

### **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 any 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 or companies with whom it is being shared. - See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

### **Your rights with respect to your personal information?**

Depending on the applicable law, you may have various rights in respect to your personal information, such as a right of access, correction, deletion, restriction of or, objection to processing of your personal data (including processing for direct marketing), and portability to another controller. Some of our websites allow you to review and update your personal data. Where this function is not available and for assistance with in respect to other personal information rights, please contact your nearest Cerule office or email us at [privacy@cerule.com](mailto:privacy@cerule.com).

Please note that these rights are subject to limitations set out in law.

If you do not want to receive advertising by e-mail or SMS, you will be given an opportunity to opt-out in the communications you receive.

If you have additional questions about this policy and our practices, please contact us at:

**Europe -**

Data Protection Officer  
Cerule France, Siège Européen  
2b avenue de l'énergie, 67800 Bischheim, France

**United States -**

Data Protection Officer  
Cerule, LLC  
735 Commercial Street, Klamath Falls OR 97601 USA

For users and members in the European Union, if you have concerns about Cerule's collection and use of your personal information that we cannot solve to your satisfaction, you have the right to file a complaint with the competent Supervisory Authority in your jurisdiction

**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.

You will be notified of any Privacy Policy changes:

- On our Privacy Policy Page

Can change your personal information:

- By emailing us
- By logging in to your 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 the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' 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 the age of 13 years old.

**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 you via email within 7 business days

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue 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 government agencies to investigate and/or prosecute non-compliance by data processors.

**CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

**We collect your email address in order to:**

- Send information, respond to inquiries, and/or other requests or questions
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service

**To be in accordance with CANSPAM, we agree to the following:**

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

**If at any time you would like to unsubscribe from receiving future emails, you can email us at**

- Follow the instructions at the bottom of each email and we will promptly remove you from **ALL** correspondence.

**UPDATES TO THIS PRIVACY POLICY**

From time to time Cerule may change this Privacy Statement. Please take a look at the "*LAST UPDATED*" to see when this Privacy Policy was revised. Any changes to this Privacy Policy will become effective when Cerule posts the revised Privacy Policy on the Site. Your interaction with us following these changes means that you accept the revised Privacy Statement.

**CONTACTING US**

If you have any questions about this Privacy Statement, please contact us by e-mail at [Global.Privacy@Cerule.com](mailto:Global.Privacy@Cerule.com), or by regular mail at Cerule LLC, 735 Commercial Street, Klamath Falls OR 97601, Attn: Compliance Team . Because e-mail communications are not always secure, please do not include sensitive information in your e-mails to us.

