

PRIVACY POLICY FOR VERIFINC CORPORATION



Purpose

The purpose of this privacy policy is to set out the principles governing our use of personal information that we may obtain about you. By using the websites, or by registering as a user of the services that we provide, you agree to this use. We ask you to read this privacy policy carefully. Any dispute which may arise over privacy will be subject to this policy, the data protection notice (if any) incorporated into this website and the provisions of the State of Texas and the United States of America.

We may change our privacy policy from time to time. We therefore ask you to check it occasionally to ensure that you are aware of the most recent version that will apply each time you access this website.

Application of this Policy

This Policy applies to all websites (including verifinc.com), applications (including mobile), products and services offered by VERIFINC Corporation (collectively "Services"). Notwithstanding the foregoing, certain Services may have additional and/or specific privacy terms that relate only to such Service. When applicable, such additional terms will be communicated to you at the time you elect to receive such Service from VERIFINC.

To the extent discrete elements of certain Services are not directly provided or managed by VERIFINC, you may be required from time to time to agree to supplemental third party policies in order to receive such Services from VERIFINC. For example, if you are a VERIFINC app user, certain information may need to be provided by you or VERIFINC to third party service providers (including those involved in hosting user content) in order to facilitate your use of such product. In each such instance, VERIFINC will identify for you any third party elements prior to your use of the relevant Service.

By using a Service, you are agreeing to this Policy and consenting to VERIFINC's collection, use and disclosure of your personal information as necessary for the Identified Purposes or as otherwise identified herein.

Under 18 year olds

This website is not intended or designed to attract children under the age of 18. We do not knowingly collect personally identifiable data from or about any person under the age of 18. If you are under 18 years old and wish to ask a question or use this site in any way, which requires you to submit your personal information, please get your parent or guardian to do so on your behalf.

What is "Personal Information"?

Personal information means any information about an identifiable individual (e.g. name, home address, resume information, financial information, health information, photographs, age, marital status, religion etc.).

To the maximum extent permitted by applicable law, this Policy is not intended to and does not apply to:

the collection, use or disclosure of personal information for personal, domestic, artistic, literary or journalistic purposes; or

the collection, use or disclosure of "business contact information" (i.e. an individual's name, position name or title, business telephone number, business address, business e-mail, business fax number and other similar business information) for the purpose of contacting an individual in their business capacity.

Collection of Personal Information

As a general rule, and to the extent possible, VERIFINC Corporation collects personal information directly from the individual it pertains to. If third parties hold information VERIFINC Corporation requires to meet the Identified Purposes, it will endeavor to ensure the information has been collected with the appropriate consent.

Personal information may be collected directly from you, from your use of our Services, or from third parties who provide such information to us as part of a Service you receive from VERIFINC.

This information may be collected in person, over the telephone, through the mail, or over the Internet. When VERIFINC collects personal information from you, we will: (i) explain how we intend to use such information; (ii) collect only such information as we believe is reasonably necessary to meet the Identified Purposes or such other purposes as are communicated to you at the time of collection; and (iii) not use or disclose such information for any other unrelated purposes without your consent, unless legally required or entitled to do so.

As an example, VERIFINC may collect personal information: (i) when you register to receive personalized information on its website or from VERIFINC Customer Service; (ii) when you provide information to gain entry into one of VERIFINC's secure sites; (iii) when you enter one of VERIFINC's promotions; or (iv) through one of our Services.

Where permitted or required by applicable law or regulatory requirements, VERIFINC may collect personal information about an individual without their knowledge or consent.

Additional information on collection of personal information for certain Services, such as VERIFINC app, can be found in Schedule B, below.

Using Your Personal Information

VERIFINC collects and uses personal information in order to: (i) respond to queries or requests from you; (ii) process orders from you; (iii) track sales data; (iv) understand your needs and preferences; (v)

develop, enhance, market and provide products and services; (vi) personalize and facilitate the ease and efficiency of your visit to our web site; (vii) provide Services to you in the most functional and efficient manner; (viii) administer and discharge our obligations in relation to any agreement you have with us; (ix) manage and develop our business and operations; and (x) meet legal requirements (collectively the “Identified Purposes”).

If you are using a Service that requires or otherwise involves the use of a third party element (e.g. as is the case with VERIFINC amp), VERIFINC may also collect (whether directly or through such third party) and use your personal information in order to: (i) facilitate your access to such Service; (ii) enable you to authenticate your account with any such third parties, or with VERIFINC through such third parties, using their authentication or online security services; (iii) aggregate assessment and other student performance data to help improve student outcomes; and (iv) store artifacts of work projects such as images or files you attach to work products in order to optimize delivery.

VERIFINC does not use the personal information of minors for the purposes of marketing our products or the products of any third party to such minors, nor do we permit third parties to do this through our Services.

Additional information on use of personal information in relation to certain Services, such as VERIFINC amp, can be found in Schedule B, below.

Sharing and Disclosing Your Personal Information

Except as set out in this Policy, we will not disclose your personal information without your consent unless we are legally required or entitled to do so. For greater certainty, VERIFINC may share your personal information with third parties, such as channel partners, service providers or other organizations: (i) where the third party or VERIFINC has your consent; (ii) where legally required or entitled to do so; (iii) where the third party is acting as our agent, contractor or service provider and has agreed to handle your personal information in confidence and in accordance with applicable laws; or (iv) where business mergers, divestments or acquisitions are involved. For example, when you register for certain sales promotions, VERIFINC may share your personal information with a VERIFINC channel partner that it reasonably believes will help meet your needs.

VERIFINC may also release personal information to third parties when such release is in compliance with applicable law or, if you are a student, VERIFINC is directed to do so by your school, if VERIFINC believes in good faith that this is necessary to: (i) protect the safety of VERIFINC and its employees and users, or the safety of others; (ii) comply with applicable laws; or (iii) enforce terms of use or licenses associated with our products or services. To the extent possible we will try to provide you with notice of our release of information for these reasons.

VERIFINC does not engage in the collection of personally identifiable information over time and across third-party web sites except where such collection is required for operation of the Services (e.g. VERIFINC amp uses Google IDs to create VERIFINC amp accounts). VERIFINC does track non-personally identifiable user data in the form of aggregate behavior for the purposes of allowing VERIFINC to

improve the operations of Services. VERIFINC may provide non-personally identifiable aggregate reports on user behavior to third parties we work with for the same purpose of improving Services.

Security of your personal data

We have implemented technologies and policies with the objective of protecting your privacy from unauthorized access and improper use and will update these measures as appropriate as new technologies become available

If you don't want your personal information disclosed to others, or if you would like to be removed from any of VERIFINC's subscription lists, please email privacy@verifinc.com. VERIFINC will not knowingly sell or rent your personal information to any other organization without your explicit permission except as otherwise set forth herein in. Notwithstanding the foregoing, VERIFINC may sell or otherwise transfer the information collected from you to a third party in the event that all or any portion of SMART is merged or otherwise transferred to the third party, provided that such third party is bound by appropriate agreements or obligations that require them to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Policy.

In the event that you are a minor, VERIFINC reserves the right to provide access to your account to your parents, guardian or other authorized adult, upon such adult's request.

Additional information on sharing and disclosing of your personal information in relation to certain Services, such as VERIFINC app, can be found in Schedule B, below.

Security

VERIFINC's business processes are designed and applied to appropriately safeguard your personal information, having regard to the sensitivity and use of that information. Nevertheless, such security measures may not prevent all loss, misuse or alteration of personal information provided to VERIFINC, and VERIFINC is not responsible for any damages or liabilities relating to any such security failures. By using our Services you understand that there is a risk that data and communications, including e-mail and other electronic communications, may be accessed by unauthorized third parties when communicated over the Internet. The foregoing does not affect any liability which cannot be excluded or limited under applicable law.

If you have any questions or concerns regarding the security measures applied to collection, use or disclosure of your personal information please email privacy@verifinc.com.

If you are using a Service that involves third party elements, as is the case with VERIFINC amp, please review the policies of such third party service providers as they relate to security and data protection.

International Storage and Transfer of Data

VERIFINC and its service providers may, from time to time, locate certain computer databases, which store personal information relating to VERIFINC's products and services, in countries outside of U.S.A. The export of personal information to such countries is permitted subject to the provision of adequate

levels of protection in relation to the processing of such information. As a key part of the contractual arrangements between VERIFINC and third party service providers, such parties are required to maintain appropriate levels of security and confidentiality in respect of personal information.

When appropriate, or otherwise required by applicable law, you will be provided with notice of the fact that your personal information may be transferred, stored or processed outside of United States of America.

Access or Updating Personal Information

We aim to keep your personal information as accurate as possible. If you would like more information about VERIFINC's privacy practices or would like to request access to or update your personal information, please contact:

Privacy Officer

privacy@verifinc.com

VERIFINC respects the concerns of individuals regarding their personal information, and will respond within a reasonable timeframe and within the time required by applicable law.

Please note that an individual's right to access the personal information an organization holds about them is not absolute. In that regard, there may be instances where applicable law or regulatory requirements permit or require VERIFINC to refuse an access request.

Opting Out or Removing Personal Information

If you would like to request that your own or your publically posted content be provided to you for your review, be removed from our services, or be updated, please contact privacy@verifinc.com. In some cases we may not be able to remove the information or continue to provide Services following removal of such information, in which case we will let you know if we are unable to do so and why.

General Information that we collect:

VERIFINC Internal Tracking. When you visit VERIFINC's website, our servers log the IP (internet protocol) address, length of each visit, number of requests per visit, operating system and browser type. VERIFINC does not link this information to any personal information that an individual may otherwise voluntarily submit. VERIFINC may use this general, non-personal information for any purpose.

Cookie Policy

To enhance your experience many of our web pages and Services use "cookies". Cookies are small text files that are placed on your computer or device. Most web browsers allow some control over cookies through the browser settings. Blocking all cookies will, however, have a negative impact upon the usability of our Services. Thus, you may prefer to accept cookies and then delete them at a later date or upon exiting your browser. In addition, our Services may contain advertisements that may contain

cookies, or contain links to other services that contain cookies. We might permit third parties to gather information passively in our Services.

Additionally, some browsers have a 'do not track' feature that lets you tell web sites that you do not want to have your online activities tracked. These features are not yet uniform, so we are currently not set up to respond to those signals. If you block or delete cookies, please be aware that not all of the tracking described in this policy will stop.

A table outlining the primary cookies used by VERIFINC is attached to this Policy as Schedule A.

General

VERIFINC may also monitor your use of our Services for system management and security purposes, and in order to detect inappropriate software and unauthorized access. Privacy and confidentiality may not be possible when using unencrypted Internet communications.

In cases where VERIFINC uses third parties to process transactions that include personal information, reasonable efforts are taken to ensure they apply comparable or higher standards concerning collection, use and disclosure.

By using VERIFINC's Services, you signify your agreement with this VERIFINC Privacy Policy. VERIFINC reserves the right, at its discretion, to change, modify, add, or remove portions of this Policy at any time. Please review our web site (<http://verifinc.com/Legal/Privacy+Policy>) regularly for the latest updates to the Policy. Your continued use of our Services following the posting of any changes to this Privacy Policy will indicate your assent to any such changes or amendments.

Your Texas Privacy Rights

Under Texas law, a Texas resident with whom VERIFINC has an established relationship has the right to request certain information with respect to the types of personal information VERIFINC has shared with third parties for their direct marketing purposes (if any), and the identities of those third parties, within the immediately preceding calendar year, subject to certain exceptions. In response to a written request, VERIFINC is allowed to provide a cost-free means to opt-out of such sharing. All requests for such information must be in writing and sent to the address set-out at the end of this Policy.

HAVE A QUESTION FOR US? We would love to hear from you:

VERIFINC Corporation

12000 Westheimer Road

Suite #380

Houston, TX 77077

1-800-211-0804

1-888-901-4489

© 2012 VERIFINC Corporation

Schedule A – Cookies Used By VERIFINC

Cookie Name	Purpose	More information
Google Analytics _utma	<p>This cookie is typically written to your browser upon the first visit to our site. If the cookie has been deleted by the browser operator, and the browser subsequently visits our site, a new __utma cookie is written with a different unique ID. This cookie is used to determine unique visitors to our site and it is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure both the validity and accessibility of the cookie as an extra security measure.</p> <p>This cookie is a persistent cookie with a lifespan of 2 years from set/update.</p>	<p>Google cookies, in general, are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from, and the pages they visited.</p> <p>To opt out of being tracked by Google Analytics across all websites visit: http://tools.google.com/dlpage/gaoptout</p>
Google Analytics _utmb	<p>This cookie is used to establish and continue a visitor session with our site. When a visitor views a page on our site, the Google Analytics code attempts to update this cookie. If it does not find the cookie, a new one is</p>	<p>To opt out of being tracked by Google Analytics across all websites visit: http://tools.google.com/dlpage/gaoptout</p>

written and a new session is established. Each time a visitor visits a different page on our site this cookie is updated and will expire in 30 minutes, thus, continuing a single session for as long as visitor activity continues within 30-minute intervals. This cookie expires when a user pauses on a page on our site for longer than 30 minutes.

This cookie is a session cookie with a lifespan of 30 minutes from set/update.

Google Analytics

`_utmc` Historically, this cookie operated in conjunction with the `__utmb` cookie to determine whether or not to establish a new session for the visitor. For backwards compatibility purposes with sites still using the `urchin.js` tracking code, this cookie will continue to be written and will expire when the user exits the browser.

To opt out of being tracked by Google Analytics across all websites visit: <http://tools.google.com/dlpage/gaoptout>

This cookie may or may not be set and is a session cookie with a lifespan of the browser session.

Google Analytics

`_utmz` This cookie stores the type of referral used by the visitor to reach our site, whether via a direct method, a referring link, a

To opt out of being tracked by Google Analytics across all websites visit: <http://tools.google.com/dlpage/gaoptout>

website search, or a campaign such as an ad or an email link. It is used to calculate search engine traffic, ad campaigns and page navigation within our site. The cookie is updated with each page view to our site.

This cookie is a persistent cookie with a lifespan of 6 months from set/update.

Contact Us ^S VERIFINC Cookies. When a visitor selects "remember me", the visitor does not have to fill in the same information next time they return. If the cookie is set then the next time the visitor returns the values will be preset from values in the cookie.

This cookie is set by VERIFINC cookie with a lifespan of 365 days.

Source VERIFINC . Source This cookie contains visitor information for the Source.

This cookie is set by VERIFINC and is a persistent cookie with a lifespan of 1 day.

VERIFINC client-token: app This cookie is written to your

Identity

browser when you sign into VERIFINC amp. Signing out of VERIFINC amp deletes this cookie from the browser. The cookie is used to store authentication information (such as user id and subscription information) in an encrypted format that only our servers can decrypt. This cookie is a persistent cookie with a lifespan of 1 year from first set.

Schedule B – Specific Privacy Terms Applicable to Certain VERIFINC Services

VERIFINC app™

For more information on using VERIFINC amp please see our VERIFINC app Terms of Use.

Collection of Personal and Other Information

Storing Your Data

When you use VERIFINC app, your data will be hosted with VERIFINC or our third party service providers, Google Inc. or Amazon.com, Inc. (or their affiliates), in the United States and around the world.

Using Your Personal Information

Third Party Service Providers

The following third party service providers will be utilized as part of our provision of VERIFINC app to you:

Google Inc., in relation to authentication and other Service features; and

Amazon.com, Inc., in relation to storage of content and other Service features.

Please consult the privacy and data security policies of such service providers as they will apply to your use of the VERIFINC app product.

About VERIFINC CORPORATION

Learn more about VERIFINC's beginnings, our ongoing accomplishments and our commitment to quality and innovation.

Visit our [Company Info page](#)

Patent Notices

VERIFINC's products, or portions thereof, are covered by various U.S. patents. Additionally, patent applications are pending in the United States of America.

View [VERIFINC's patent portfolio](#)

Corporate logos

VERIFINC's logo designs are trademarked and must display a TM symbol according to our logo guidelines.

[Support Center](#)

[Software downloads](#)

[Product Registration](#)

[Activate software](#)

[Check your warranty](#)

[Retrieve product key](#)

[IT admin downloads](#)

[Training and Professional Development](#)

2012©VERIFINC CORPORATION All rights reserved | [Legal Terms](#)

[Site map](#)

This site uses cookies to improve the experience of our visitors. By continuing to browse this site, you are agreeing to our use of cookies. [Find out more.](#)