

Marketbright Security Policy Privacy Policy

(Version v1 - February 25, 2009)

Overview

Marketbright Inc. ("Marketbright" or "we") respects your preferences concerning the collection and use of your personal information ("data"). Our goal is to deliver content targeted to the industry you work in, the products you use, the role you play in your organization, and your specific preferences. To provide you with relevant information, fulfill your specific requests, and enhance your experience across our Web site, we will at times request data from you including:

- **Personally identifiable information (PII)** is information that enables us to identify you, such as your name and e-mail address. This information is maintained by Marketbright so that you do not have to enter it each time you visit our website to login to your account.
- **Non-personally identifiable information ("NPII")** is data such as a prospect's IP address, domain type, and date and time of a Web visit. This anonymous information is used to track Web behavior and to advertise more effectively.

This policy lets you know how we collect data, why we collect it, and what choices you have concerning its use.

Marketbright Inc. is a Licensee of the TRUSTe Privacy Program. TRUSTe is an independent organization whose mission is to build users trust and confidence in the internet by promoting the use of fair information practices. This privacy statement covers the Web site www.marketbright.com ("Site"). Because this Site wants to demonstrate its commitment to your privacy, it has agreed to disclose its information practices and have its privacy practices reviewed for compliance by TRUSTe.

If you have any questions or concerns regarding this statement, contact us at information@marketbright.com. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, contact TRUSTe at http://www.truste.org/consumers/watchdog_complaint.php. TRUSTe will then serve as a liaison with us to resolve your concerns.

While our primary data centers are in the USA, we will transfer data provided by customers to the appropriate Marketbright office, distributor, partner or consultant to deliver the service or information requested by the customer. In order to provide service in a timely, cost effective and efficient manner, data provided to Marketbright may be made available to authorized Marketbright users across our global offices that require access to the data for business purposes. .

Third-Party Web Sites

Marketbright provides links to non Marketbright sites we believe may be of interest to you. These sites are provided as a convenience and are beyond our control. We are not responsible for the privacy practices or the content of these other Web Sites. You are advised to check the privacy policies and terms of use of those sites before providing your personal data to them.

To learn more about Marketbright's privacy policy, review the sections below for information pertaining to:

1. [Types of Data Collection](#)
2. [Data we Collect and how we Use it](#)
3. [Customization, Preferences, and Opt-Out](#)

4. [Account Access](#)
5. [Advertising](#)
6. [Security](#)
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Types of Data Collection

Marketbright collects data related to our users through the following methods:

- Automated means such as communications protocols and cookies
- Registration screens and online forms
- Sales inquiries and transactions
- Customer communications
- Third party sources of information, such as opt in lists.

Depending upon the method of collection and use, the data collected may include personally identifiable information about the user from contact and registration forms (such as name, address,, phone number and e-mail address as well as other identifying information such as your job title and company name), and user preferences (including product requirements, areas of industry interest, newsletter preferences, and other information managed from the customer profile that is created when registering on Marketbright.com).

Electronic Communications Protocols and Cookies:

Marketbright may receive data from you as part of the communication connection itself, that is, the standard electronic greeting between your computer and our servers. This information often consists of network routing (where you came from), equipment information (browser type), date and time. At this time, our server will also query your computer to see if there are "cookies" previously set by Marketbright.com to facilitate log in or other site navigation procedures This Web Site Navigational Information is logged to help diagnose technical problems, to analyze trends, to track users' movements around the site, and to administer our Site in order to constantly improve the quality of the Site and our Service.

Cookies: A "cookie" is a small piece of information sent by a Web server to store on a Web browser so it can later be read back from that browser. Some parts of the Marketbright site use cookies to collect information about visitors' use of the Web site and to facilitate return visits. The information collected from cookies is tracked to enhance security and/or to improve the functionality of the Web site by avoiding duplicate data entry, facilitating navigation, and increasing the relevance of content.

Cookies on the Site may be tied to your PII . Marketbright.com cookies may collect the following information: a unique identifier, user preferences and profile information used to personalize the content that is shown, and membership information to allow you to access your Marketbright account or register for events without having to enter your email address each time. In the future, as we enable further customization of the site, cookies will help in assuring that information provided to you will be the most relevant to your needs.

Third Party Cookies:

- Marketbright uses a third party to track and analyze usage and volume statistical information (which does not include personally identifiable information) from visitors to the Web site to help us continue to improve the quality of our Web site. This third party uses cookies to help track visitor behavior and sets cookies on behalf of Marketbright. This provides us with information about site usage that reflects individual behavior of visitors, but not personally identifiable information.

- Marketbright uses another third-party to display retargeted ads to prospects. This third-party uses cookies and embedded pixels to collect NPII data, such as IP address, domain type, time and date of visit, and how you interacted with our products and services. With this information, we are able to display more customized ads on third-party sites that support online advertising.

All data collected by the third party on behalf of Marketbright is used only to provide us with information on site usage and is not shared with any other third parties. We reassociate this information with previously collected aggregated registration information for purposes specified in this policy, but in the main to:

- Select content based on registration data and movement through the site
- Tailor marketing to users' needs
- Aggregate web activity based on user registration attributes

Choices about Cookies: You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.) Rejecting the use of cookies will not affect your capacity to use our Site though you may not have the benefit of a customized experience while on the Site.

Embedded URLs: To provide maximum site utility, Marketbright also uses a tracking technique that uses embedded URLs to allow use of the site without cookies. Embedded URLs manifest themselves as plain text or encoded extensions to the URL that appears in the browser address or location toolbar. This technology allows limited information to follow you as you navigate the site, but is not identified to personal data and is not used beyond the session. While this increases your ability to surf the site, it does not replace the functionality or streamlining of cookies and may limit your use of many convenience features offered by the site.

Embedded Pixels: To provide users with the most relevant Web site content and marketing materials, we may also use embedded pixel technologies to help track site usage and marketing campaign responsiveness. On the Web site, these technologies are used on selected pages for the purposes of identifying unique user visits as opposed to aggregate hits. The site usage information collected by these technologies is associated with cookies and may provide data about site use by registered users of www.Marketbright.com. This information is used to evaluate site content, navigability and composition as well as page response rates. When these technologies are used in emails, they provide non-personally identifiable information on when the email was opened.

How We Use The Data We Collect

Marketbright collects data from users for the following purposes:

- As a result of your site navigation. Data may be collected to help personalize Web site content and enable navigation that is most relevant and user friendly. This automatically collected information as described above is collected in the aggregate & is not tied to personally identifiable information.

We use your registration information to create your profile on our Site, contact you about the services you have expressed an interest in as well as send you newsletters and other products that may be of interest to you, provide information requested and target future marketing communications.

- As a result of your registration for/attendance at a Marketbright conference or event. Those existing customers or registered Marketbright.com users who sign up for a conference or event may be contacted prior to the event to see if any meetings, special demonstrations or other customer facilitation may be provided. This contact is in addition

to any contact that may be required to confirm payment or provide logistical information and updates related to the conference.

Marketbright may be required to disclose your personally identifiable information to the Government or other third parties in certain instances, such as illegal activity on our Site. We reserve the right to disclose your personal information to our service providers, law enforcement or other government officials or in response to a formal request in a civil action, Court order or judicial proceeding or subpoena.

Communications Choices

Marketbright.com allows you to opt out of promotional emails and newsletters sent to you from our Site should you choose to no longer receive them. These choices are established and modified via your online registration profile. A link to this profile will be available in marketing emails. You can return to the registration profile at any time to change your elections or modify your profile at www.marketbright.com/account/login.html or you can unsubscribe at www.marketbright.com/account/unsubscribe.html . If you have any problems in using any of these opt-out mechanisms, please send an email to support@marketbright.com , indicate opt-out in the subject line and specify what problem you have encountered in the body of the message.

MarketBright.com reserves the right to send the users of our Site certain communications relating to the use of our Site, such as in responding to your inquiries, service requests, or in providing you administrative messages and announcements that are considered part of your account, without offering you the opportunity to opt-out of receiving them.

Information-Sharing Choices

Marketbright only shares data with selected companies after providing users the ability to either opt out of or opt into the sharing. There are limitations to opting out in the case of (1) joint sale or joint events where the data goes to both Marketbright and the other party at the same time; (2) where the customer has requested follow up which involves Marketbright partners.

Third Party Permission-Based Lists

On occasion, Marketbright may use a third party permission-based list to send communications about Marketbright products and services. These are lists maintained by third parties whose users have consented to receive emails from other companies, such as Marketbright. We do not have access to the names and contact information on these lists; the third party that has the direct relationship with these users maintains the list and the opt-outs, removes, and unsubscribes. We require the list owners to identify themselves as the mailers of the email and to provide appropriate opt-out mechanisms.

If you wish to be removed from a third-party list, you should direct your opt-out request to the list owner, not to Marketbright. Nevertheless, if you have trouble opting out, or if you wish to make us aware of any issues related to a third-party mailing sent on our behalf to you by a third party, you may contact us directly at information@marketbright.com. When third-party mailings are sent with a Marketbright reply address, Marketbright also will provide a notice with information about how to opt-out of future Marketbright marketing communications.

Please contact us at information@marketbright.com if you believe you have mistakenly received information after opting out or if you would like to opt out of receiving information and have been unable to use the opt-out mechanisms provided in the email you received.

Access

Marketbright has provided you the ability to create an account or profile of information. We maintain the data and allow you to update, change or delete it at any time your preferences change. To change this information, please login as usual and follow the prompts to "update my

profile." We continue to work to increase the scope of information that you may access and update. Please contact us at information@marketbright.com should you require further assistance concerning your information or if you have trouble accessing your profile; please indicate access in the subject line and let us know what the access problem is in the body of the message. You may also obtain assistance by writing to us at the following address:

**Attn: Chief Privacy Officer
Marketbright, Inc.**

1150 Bayhill Dr., Ste. 215
San Bruno, CA 94066
Ph: (877) 777-6582, ext 7
Direct: (650) 871-6582
Cell: (415) 218-0768
Fax: (509) 271-0695

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, access issues will either be addressed within thirty days or you will be contacted regarding the nature of the problem and appropriate next steps.

Advertising

Marketbright uses some third parties to administer a limited set of Marketbright advertisements on our Site. No personal information pertaining to our users is provided to the advertisers as part of this process, but aggregate profile information may be used in the selection of advertising to be displayed to make sure that it has relevance to the user. On some banner ads, an embedded pixel may be present, and while it does not associate with a cookie or other personal profile information, it may return session connection information that allows advertisers to better determine how many individual users have clicked on the ad banner.

Blog Disclosure

If you use a bulletin board, blog or chat room on this website, you should be aware that any personal information you submit there can be read, collected, or used by other users of these forums and could be used to send you unsolicited messages. We are not responsible for the personal information that you choose to submit in these forums.


Testimonials

We post customer testimonials on our Site which may contain personal information such as the customer's name. We obtain the customers consent prior to posting the testimonials on our Site with their personal information. We are not responsible for the personal information customers select to disclose in their testimonials.

Security

Marketbright is concerned with the security of the data we have collected and has in place reasonable measures to prevent unauthorized access to that information. These measures include policies, procedures, and technical elements relating to data access controls.

In the event that individual personal data is acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, Marketbright will notify the affected individual of the breach by email or fax or, if Marketbright is unable to contact the individual by email or fax, then by U.S. mail. Notice will be given promptly, consistent with the legitimate needs of law enforcement and any measures necessary for Marketbright or law enforcement to determine the scope of the breach and to assure or restore the integrity of the data system. Marketbright may delay notification if Marketbright or a law enforcement agency



determines that the notification will impede a criminal investigation, unless and until Marketbright or the agency determines that notification will not compromise the investigation.

Compliance Issues

Marketbright has appointed a Chief Privacy Officer. Should you believe your data has been used in a way that is not consistent with this policy or your stated preferences, or should you have further questions related to this policy, please contact the Chief Privacy Officer by email at information@marketbright.com. Written inquiries may be addressed to Chief Privacy Officer, Marketbright Corporate Affairs, 1015 15th St. Ste 200, Washington DC 20005, United States of America.

As noted in Section 4 (Customizations, Preferences, and Opt-Out) and Section 5 (Access and Registration Updates) above, Marketbright provides you the ability to make choices about how we use and share data you provide to us. In addition, under California Civil Code Section 1798.83 (also known as S.B. 27), if you are a California resident and your business relationship with Marketbright is primarily for personal, family, or household purposes, you may request certain data regarding Marketbright's disclosure, if any, of data to third parties for the third-parties' direct marketing purposes. (Note: Marketbright does not provide personal identifiable information to third-parties for any direct marketing purposes.) To make a request, please send an email message to information@marketbright.com with "Request for California Privacy Information" in the subject line; you may make such a request up to once per calendar year. If applicable, we will provide you, by email, a list of the categories of data disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the third parties' names and addresses. Please note that not all data sharing is covered by S.B. 27's requirements.

Policy Updates

If we are going to use your data in a manner different from that stated at the time of collection, we will notify you via email. You will have a choice as to whether or not we use your data in this different manner. In addition, if we make any material changes in our privacy practices that do not affect user data already stored in our database, we will notify you by email or post a prominent notice on this Web site notifying users of the change. In some cases where we post the notice we will also email users who have opted to receive communications from us, notifying them of the changes in our privacy practices.

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will post the policy changes to our Web site to notify you of these changes and we will use for these new purposes only data collected from the time of the policy change forward. If you are concerned about how your information is used, you should check back at our Web site periodically. We appreciate your comments on Marketbright's privacy practices: information@marketbright.com

If you feel that this site is not following its stated information policy, you may contact The Federal Trade Commission by phone at 202.FTC-HELP (202.382.4357) or electronically at <http://www.ftc.gov/ftc/complaint.htm>.