



Partner Marketing Program Privacy Policy

Effective Date: July 1st, 2017

This Privacy Policy covers StructuredWeb, Inc.'s And Ingram Micro Cloud ("StructuredWeb", "Ingram", "we", "us") treatment of information collected through the StructuredWeb website and other online services operated by StructuredWeb, including the StructuredWeb platform (the "Platform", and collectively, the "Service"). StructuredWeb offers its enterprise customers a means of integrating with channel partners through the Platform.

The Platform is provided as a service (SaaS) to you, your employees and your vendors to enable marketing collaboration. The Platform enables vendors to upload marketing content and programs and invite their channel partners, you, to use it. Please check our standard terms of use for a complete overview of your rights to access and use our Platform.

You and your employees may use the Platform to launch and run marketing activities, capture leads and manage them. All activity by you and your employees is done from a shared account.

For purposes of this Privacy Policy, a "Marketing Program Provider" is a vendor or distributor that invites you to use the Platform.

Information that StructuredWeb Collects

Registration Information. StructuredWeb & Ingram collect personal information when you register for an account with the Platform, such as your name, address, phone number and email address.

Using the Service. We also collect information when you use certain StructuredWeb and Ingram products or services, when you visit StructuredWeb & Ingram pages.

Platform Users. Through the use of the Platform, we might collect information about you and your users and track how you use the Platform, the tools you use and the marketing materials you access. We and the vendor for whom you are using the Platform will be able to track how often you login to the Platform, which marketing assets you use and measure how many leads and opportunities you generate from any marketing activities you launch from the Platform.

Platform Users' Customer Data. As a user of the Platform, you or your employees might choose to upload your customer mailing list to our Platform. You might also use our landing pages to capture new leads from email or other digital marketing activities (with your customer mailing list, this information is "Customer Data"). All of this Customer Data is yours and, except as set forth in this Privacy Policy, we do not grant anyone else rights to it.

Customer Support. We may collect information about you through your communications with our customer-support team.

Cookies, Automatic Data Collection, and Related Technologies. The Service collects and stores information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

When you visit the Service, we and our third-party service providers receive and record information on our server logs from your browser, including your IP address, and from cookies and similar technology. Our service providers may collect information about your online activities over time and across different online services. Cookies are small text files placed on your computer browser when you visit a website. Most browsers allow you to block and delete cookies. However, if you do that, then the Service may not work properly.

By using the Service, you are authorizing us to gather, parse, and retain data related to the provision of the Service.

How We Use Your Information

Internal and Service-Related Usage. We use information, including unique identifiers and your location for internal and Service-related purposes, such as data analytics, and may share this information with service providers to allow us to provide, maintain, and improve the Service.

Communications. We may send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance.

Aggregate Data. We may anonymize and aggregate data collected through the Service and use it for any purpose. This includes compiling reports to analyze marketing assets performance and the aggregate results of their use. We use this information to continue to improve the Service, make recommendations to our customers for new tools and content you might want to use and provide reports to the Marketing Program Provider so it can also understand the Platform or content usage to better serve you.

Who can use Customer Data. All of your Customer Data is considered your private and confidential information. Your vendor, unless otherwise agreed upon, is granted access to your Customer Data solely to help you with your marketing initiatives, lead capture and conversation of opportunities to sale.

What we do with Customer Data. We access and use your Customer Data to help you with your own marketing activities and to benefit your own business. At your request, we will help

you to upload your mailing list or configure marketing programs in your account. We might run automatic programs to organize your data and enhance the information you have about your prospect to help you with your marketing activities. From time to time you or your employees might contact our customer support team to get help with use of the Platform. In such situation, we might need to access your account, diagnose the problem and help you resolve it. Again, such access will be limited and will be done to help you with your own marketing initiatives on the Platform.

Disclosing Your Information

We Use Vendors and Service Providers. We may share any information that we receive through the Service with vendors and service providers retained in connection with the provision of the Service, including for data analytics purposes.

What we won't do with Customer Data. Except as described in this Privacy Policy, we will not use, sell, share or transfer your Customer Data to anyone else without your permission. We use best practices to ensure that all leads generated from your Customer Data and marketing activities go to you.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your information and/or other account information or content if we believe doing so is required or appropriate to: (i) comply with law enforcement requests and legal process, such as a court order or subpoena; (ii) enforce this Privacy Policy, or other agreements; (iii) respond to your requests; or (iv) protect your, our or others' rights, property, or safety.

Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. The use of your information following any of the foregoing events will be governed by the provisions of the Privacy Policy in effect at the time StructuredWeb & Ingram collected such information.

With Your Consent. We may also disclose your information with your permission.

Choices You May Have With Your Information

Account Information. Through your account settings, you can update some of your personal information, such as your name and email address. You can also contact us at service@structuredweb.com to update your information. In order to delete your StructuredWeb Account Information, you must cancel your account by contacting StructuredWeb Service, 20 W 20th Street, New York, NY 10011.

Opt-out. You can unsubscribe from promotional emails from us via the unsubscribe link provided in the email. Even if you opt out from receiving promotional messages from us, you will continue to receive administrative messages from us.

Security of Your Information

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us.

Privacy of your Customer Data. We respect your data privacy and use industry standard security practices in place to ensure that we protect your information. We try to limit access to your account to employees that are engaged to help you with your marketing activities or provide you with technical support.

How we store your Customer Data. Your Customer Data will be stored at our data center in New Jersey, USA and at our Disaster Recovery site in Illinois, USA. Our data center employs industry standard practice for physical and cyber security. Your Customer Data is stored in our Oracle powered database and all personal information is encrypted.

Customer Data Security. StructuredWeb maintains industry-standard administrative, physical and technical safeguards for the protection of the security, confidentiality and integrity of Customer Data. These include using industry-standard third party service providers for hosting and other technical services.

Do Not Track

Some web browsers incorporate a “Do Not Track” feature. Because there is not yet an accepted standard for how to respond to Do Not Track signals, our website does not currently respond to such signals.

By using the Service or providing information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Service or sending an e-mail to you. You may have a legal right to receive this notice in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please notify us at service@structuredweb.com.

Children’s Privacy

We do not knowingly collect, maintain, or use personal information, as defined by the Federal Trade Commission’s Children’s Online Privacy Protection Act (“COPPA”) Rule, from children under 13 years of age, and no part of the Service is directed to children under the age of 13. If you learn that your child has provided us with personal information without your consent, you may alert us at service@structuredweb.com. If we learn that we have collected any personal information from children under 13, then we will promptly take steps to delete such information and terminate the child’s account.

International Users

If you visit the Service from the European Union or other regions with laws governing data collection and use, then please note that you are agreeing to the transfer of your information to the United States and processing globally. By providing your information to the Service, you consent to any transfer and processing in accordance with this Policy.

Changes to Our Privacy Policy and Practices

Posting of Revised Privacy Policy. We will post any adjustments to the Privacy Policy on this web page, and update the “Effective Date” above. If you are concerned about how your information is used, then bookmark this page and read this Privacy Policy periodically. Your continued use of the Service after changes to the Privacy Policy constitutes your acceptance of the new terms of the Privacy Policy.

New Uses of Information. From time-to-time, we may desire to use information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, then we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

FAQ:

Can you use my data to promote your products and services? – No, we will ask your permission before using your data to promote StructuredWeb products and services. We are committed to use your data, under your permission, to help you grow your business.

Can my vendor use my data? – your vendor agrees to the same security standard and privacy policy terms and is prohibited from using your data for any reason other than to help you with your own sales and marketing initiatives with your consent.

Did you ever have any complaint on data leak or misuse? – StructuredWeb has been in business since 1999 and we are not aware of any data leak or breach of customer privacy incident.

How do you ensure that my data is well protected? – We apply industry standard practices to make sure our software and your data are protected. We use our software platform for our own sales and marketing initiatives and apply the same streaked procedures and policies we use for our own data to your data.

Can I delete my Customer Data? – Yes, if you ever decide to close your account with StructuredWeb you can login to your account and delete all customer information and Customer

Data you uploaded or generated on the platform. We will not keep a copy of your data and will erase it after a reasonable amount of time from our backup and disaster recovery sites.

Do you have Errors and Omissions insurance? Yes, we have a reasonable Errors and Omissions insurance policy in place. A copy of this insurance certificate can be provided at your request from service@structuredweb.com.