

Privacy Policy

October 2016

We at Teneo Linguistics Company, LLC (“TLC”, “Teneo Linguistics Company”, “we,” “us,” or “our”) have created this privacy policy (“Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy applies to our information collection and use practices: (i) online when you visit any of our website tlctranslation.com (the “Website”); and (ii) offline when you provide information to us. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Service.

Acceptance of Terms

By visiting our Website, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Service, both of which govern your use of the Website. By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

The Information We Collect

In the course of operating the Website and/or interacting with you, we will collect (and/or receive) the following types of information.

1. Personal Information.

When you sign up to receive any of our newsletters, respond to a survey, register for use, or purchase any product or service, you may be required to provide us with personal information about yourself, such as your name, address, email address, and phone number. We do not collect any personal information from Visitors when they use the Website unless they provide such information voluntarily, such as by registering or sending us an email or signing up for a newsletter. All information we collect and/or receive under this section is collectively called “Personal Information.”

2. Order Information.

When you place an Order, you must provide us with certain information about the products and services you are seeking to purchase. Such information is

collectively called the “Order Information.”

3. Billing Information.

When you wish to purchase a product or service, you will be required to provide certain information in addition to the Personal Information and Order Information noted above. Such information may include a debit card number, credit card number, expiration date, billing address, activation codes, and similar information. Such information is collectively called the “Billing Information.” Although we will have access to the Billing Information, it will also be collected and processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use.

4. Other Information

In addition to the information noted above, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

- a.** Additional information about yourself that you voluntarily provide to us (e.g., via a survey), such as household income range, gender, product and service preferences, and other information that does not identify you personally.
- b.** Information that we automatically collect when you use the Website, including, without limitation:
 - IP addresses, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages; what sections of the Website you visit; and similar data; and
 - Information about your device, including the type of device; universally unique ID (“UUID”); advertising identifier (“IDFA”); MAC address; operating system and version (e.g., iOS, Android or Windows); carrier and country location; hardware and processor information (e.g., storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data.
- c.** Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the

Website. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser's documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Websites may not function properly.

d. We use third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Websites and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Websites, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Websites.

e. We also may collect or receive information from third parties, such as Facebook and/or other third-party social media sites.

Information Collected by or Through Third-Party

Advertising Companies

We may share Other Information about your activity on the Website with third parties for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on the Website and elsewhere. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such Other Information for such purposes. Pixel tags enable us, and these third-party advertisers, to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site.

Accessing and Modifying Personal Information and Communication Preferences

You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any TLC marketing email. Customers cannot opt out of receiving transactional

emails related to their account or their Orders. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

How We Use and Share the Information

We use the Personal Information, the Order Information, the Billing Information, and the Other Information (collectively, the “Information”) to provide our services; to process Orders; to administer our rewards and promotional programs; to maintain and improve our Websites and services to you; to solicit your feedback; and to inform you about our products and services and those of our third-party marketing partners.

We may also use and/or share Information as described below.

- TLC will access, use, and share the Information as required to process your Orders and provide support to you.
- In order to provide our services and administer our rewards and promotional programs, we may share the Information (excluding the Billing Information) with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
- With your permission, third-party applications or services may access your Personal Information. We use standard OAuth (open authorization) to enable you to give permission to share your Personal Information with other websites and services, such as Facebook and Twitter (e.g., when you agree to a pop-up requesting you to allow another application to access your account information). We also use OAuth to allow us to share information about you that is stored by us without sharing your security credentials.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, Order fulfillment, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- In an ongoing effort to better understand our Visitors, customers, and our products and services, we may analyze the Order Information and Other Information in aggregate form in order to operate, maintain, manage, and improve the Website and/or our products and services. This aggregate information does not identify you personally. We may share this aggregate

data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.

- We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of TLC or others.

Information You Share

Please keep in mind that whenever you voluntarily make your Personal Information available to third parties — for example on message boards or web logs; through email; during webinars, classes, telephone conferences, or calls; or in comment or chat areas — that information can be seen, collected, heard, and/or used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

How We Protect the Information

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Website may not be secure, and you should therefore take special care in deciding what information you send to us via email.

Important Notice to Non-U.S. Residents

It is important to note that the Website and their servers are operated in the United States. If you are located outside of the United States, please be aware that any Information you provide to us will be transferred to the United States. By using the Website and by providing us Information when using our services, you hereby irrevocably consent to this transfer and our use of the Information and data provided by you in accordance with this Privacy Policy.

Children

We do not knowingly collect Personal Information from children under the age of 13 through the Website. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Website without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

California Residents

TLC does not monitor, recognize, or honor any behavioral advertising opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

External Websites

The Websites may contain links to third-party websites. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing the Website and/or using our services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by

the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

How to Contact Us

If you have questions about this Privacy Policy, please contact us via email at info@tlctranslation.com with “Privacy Policy” in the subject line.