

SkillSTICK™ Privacy Policy

Last Updated May 23rd, 2012

In this statement of privacy practices (“**Privacy Policy**”), we, Strategic IP Licensing, Inc. and its affiliated United States companies (hereinafter collectively referred to as “**SIPL**”, “**we**”, “**us**”, or “**our**”), provide information about what personal information we collect and how we collect, use, disclose, store, and transfer personal information about www.skillstick.com visitors and SkillSTICK™/SkillGRID™¹ users (hereinafter referred to as “**you**”, “**yours**”, or “**user**”). Please take a moment to review this Privacy Policy and contact us at privacy@strategiciplicensing.com if you have any questions.

Collection and Use of Personal Information

“**Personal Information**” is hereinafter used to refer to data that can be used to uniquely identify or contact a single person. You may be asked to provide your Personal Information anytime you are in contact with us or at the time of SkillSTICK purchase. Except for the initial use and activation of SkillSTICK, at which time you *must* enter the Personal Information found in the **SkillSTICK Activation** section of this Privacy Policy, anytime you use SkillSTICK or SkillGRID, you have the *option* to upload Personal Information to either system. We will use consistently with this Privacy Policy any and all Personal Information you provide.

Personal Information We Collect And How We Use It

Website

When you contact us using www.skillstick.com with an information request, you must give us Personal Information which includes your full name, company, job position/title, mailing address, email address, and telephone number. We will use this Personal Information to fulfill your request; to perform internal data analysis; and to improve our website, products, and services. If you submit a technical support request on www.skillstick.com, you must give us the subject of the technical request, your full name, company, email address, telephone number, and details about your technical trouble. We will use this Personal Information to assist you with your technical support issue; to perform internal data analysis; to improve our website, products, and services; and to strategize marketing efforts.

We collect a variety of non-personal data from visitors on www.skillstick.com. We use Google Analytics, which uses a cookie, to collect some of this data. Anonymous traffic data collected includes your IP address, time spent on webpages, location, and the URL you were at before your visit. We will use this data to perform internal analysis and to improve the website experience of our visitors.

SkillSTICK Purchase

When you purchase a SkillSTICK, you must enter your full name, mailing address, email address, telephone number, a password for your SkillGRID account, credit cardholder name, credit card number, credit card expiration date, and credit card security code. We will use this Personal Information to complete the purchase of your SkillSTICK, ship the hardware to you, create your SkillGRID user account, and to perform internal data analysis. Note that your credit card information will be transferred to our payment processor in order to process your payment.

SkillSTICK Activation

If you purchase a SkillSTICK on www.skillstick.com, when you first use your SkillSTICK (which you must do with an active internet connection), you must enter your location and job position. If you receive a SkillSTICK from your company's enterprise order, upon SkillSTICK activation you must enter your full name, email address to be associated with your account, location, and position. We will use this Personal Information for internal data analysis; to improve our website, products, and services; and to strategize marketing efforts.

SkillSTICK or SkillGRID

When you access your account from either SkillSTICK or SkillGRID, the following Personal Information may be collected

¹ SkillSTICK™ and SkillGRID™ are trademarks of Indaptive Technologies, Inc.

or altered by visiting the following parts of the applications (note that if you alter your Personal Information while using SkillSTICK off-line, that any changes to your Personal Information will not be submitted to the SkillGRID database until you synchronize your data while using SkillSTICK on-line)

▲ **Profile**

- **Required information:** full name, company, job position, mailing address, email address, office telephone number, home telephone number, mobile telephone number, date of birth, account password, and location.
- **Optional information:** employee ID, profile image, and supporting documents.

▲ **Position Grid**

- **Optional information:** training item record comments and any information contained in a supporting document which you upload to verify the completion of any training item.

The above Personal Information may be used by your company for certification verification and tracking and for employee management; we use this Personal Information for internal data analysis; to improve our website, products, and services; and to strategize marketing efforts.

There is certain account Personal Information which you cannot change after initial activation or purchase of SkillSTICK; if you find at any time this Personal Information is incorrect, please contact your company SkillGRID administrators or SIPL to modify this Personal Information.

Enterprise Licenses

If your company has an enterprise license for SkillSTICK and/or SkillGRID technology, your company might furnish to us Personal Information on your behalf. This Personal Information may be delivered to SIPL at the time of purchase, account set-up, or account activation (performed by either SIPL or an account administrator within your company) or at any time when SIPL, as it reserves the right to do, requests your company to provide user Personal Information. We will use this Personal Information to uphold our responsibilities in the business relationship with your company; for internal data analysis; to improve our website, products, and services; and to strategize marketing efforts.

Surveys

We may contact you with a request to fill out a survey; such surveys will be optional and you may be selected to participate at random or based on Personal Information. In such surveys, we will request Personal Information which may include your full name, company, job position, mailing address, email address, telephone number, and SkillSTICK/SkillGRID username. We will use this Personal Information for internal data analysis; to improve our website, products, and services; and to strategize marketing efforts.

Email Correspondence

If you are in email correspondence with SIPL, we ask that you provide your full name, company name, job position/title, address (including zip/postal code), email address, telephone number, and SkillSTICK/SkillGRID username. We will use this Personal Information to foster productive correspondence with you; to perform internal data analysis; to improve our website, products, and services; and to strategize marketing efforts.

Transfer of Data

Transfer of Data to the United States

By using SkillSTICK and SkillGRID, you implicitly consent to transferring your Personal Information to the United States to be stored and processed, as specified herein.

Transfer of Data to Third-Parties

A “**third-party**” is any entity other than SIPL or its affiliated companies. We do not sell, rent, or otherwise provide your Personal Information to any third-party without your consent except as described in this Privacy Policy; such exceptions include

1. when necessary to enforce our End User License Agreement (“**EULA**”) or to uphold our responsibilities in an enterprise contract if we have one with your company;
2. when required by law;
3. if necessary to protect the property, rights, or personal safety of SIPL, its users, or the public;

4. where it is necessary to process any of your requests (e.g., transfer of payment information to payment processor to complete your purchase);
5. to transfer of Personal Information to Rackspace® for server hosting; or
6. transfer of your Personal Information to third-parties to perform internal data analysis or to fulfill any technical support or information requests.

Your Obligations

As a user, you have certain obligations which you must uphold in order to continue using SkillSTICK and SkillGRID:

- ⤴ You must, at all times, abide by the terms and conditions of the then-current Privacy Policy and EULA;
- ⤴ You must not upload, download or otherwise disseminate any information that may be deemed to be offensive, racist, xenophobic, violent, injurious, or which may otherwise not fit the purpose of the SkillSTICK/SkillGRID system;
- ⤴ You must not upload, download or otherwise disseminate any information which may violate any intellectual property rights of any third-party;
- ⤴ You must not provide to SIPL any information that you believe might be injurious to either your person or professional status or to another user's person or professional status; and
- ⤴ You must keep your username and password confidential and not disclose this information to any other entity than yourself.

If you in any way violate these obligations, we may restrict, suspend, or terminate your account at our sole discretion. In such event, you will not be refunded any of your payments to SIPL for purchased products or services.

Important Information

Children and Minors

Children under the age of 18 are not eligible to use our service.

Data Security

Access to your data on SkillSTICK and SkillGRID is password-protected and all Personal Information stored and transferred within SkillGRID is protected by SSL encryption. To protect data stored on SIPL or its suppliers' servers, SIPL or its suppliers regularly audit the system and websites for vulnerabilities and malicious attacks, and we use Rackspace® servers which are protected by a variety of physical, system, and operational security measures (to read more about Rackspace® server security, click [here](#)). Security measures notwithstanding, the internet is not 100% secure, and as such, we cannot and do not guarantee, whether explicitly or implicitly, that your Personal Information will be protected against theft, loss, or destruction.

Changes to Privacy Policy

We reserve the right to modify this Privacy Policy at any time; if we make substantial changes to this Privacy Policy, we will add a notification on www.skillstick.com. If you object to any changes to this Privacy Policy, you must immediately cease using SkillSTICK and SkillGRID technologies and cease all correspondence with SIPL (except for such correspondence necessary to resolve any privacy disputes or claims of infringement) and you must close your user account. By continuing to use SkillSTICK or SkillGRID after notice of changes has been published on www.skillstick.com, you are implicitly consenting to the changes made.

Problems With Your Account

If there is an issue, inconsistency, concern, or other discrepancy with your account, we may use the Personal Information you provide to contact you or to resolve any discrepancies.

Account Closures and Expirations

In the event you choose to close or fail to renew your SkillGRID account, we will keep all of your account information, including demographic information, uploaded documents, eLearning course progress, and training progress, in our system in case you decide to renew your SkillGRID subscription. We may use this Personal Information to contact you; improve

our website, products, and services; and perform internal data analysis. We will not transfer this Personal Information to any third-parties, except under the circumstances listed herein.

Marketing Contact Lists

We may, from time-to-time, send you marketing and promotion materials via mail or email. We may also use other Personal Information to target marketing and promotional materials to specific users. If you wish to remove yourself from our contact lists, please contact us using the information below. Note that you may continue to receive marketing and promotional materials until we have updated our contact lists.

U.S.-EU and U.S.-Swiss Safe Harbor

For Personal Information transmitted from the European Economic Area and from Switzerland, SIPL and its affiliates have committed to handling such Personal Information in accordance with the U.S.-EU and U.S.-Swiss Safe Harbor Principles. The U.S.-EU and U.S.-Swiss Safe Harbor Principles are as follows: Notice, Choice, Onward Transfer, Security, Data Integrity, Access, and Enforcement. Our Safe Harbor certification can be found at <http://web.ita.doc.gov/safeharbor/shlist.nsf/webPages/safe+harbor+list>. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's website at <http://export.gov/safeharbor>.

Contact Us

If you have a technical support request, please use [this form](#) to contact us. For questions or comments about this Privacy Policy, please contact using [this form](#) or at:

Attn: Max Bathman
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