

CharacTell Privacy Policy, February 2016

This site is owned and operated by CharacTell Ltd. We respect your privacy and our goal is to maintain your trust when handling your personal information. This document is intended to inform you, the end user, about how we handle information we process on behalf of our clients who use our lead generation and online marketing services.

The CharacTell Privacy Policy applies to CharacTell websites that link to this Policy. By using this Site you are accepting the practices described in this Privacy Policy and you agree to adhere to the Terms and Conditions posted on the Site. If you do not agree with any terms, please do not use this Site or submit any personal information.

This policy is effective as of February 2016. If you have any questions regarding this Privacy Policy, you may email us at info@charactell.com.

Information We Collect

Children's Privacy

This Site is not directed to children under the age of thirteen and we do not knowingly collect personal information from children under the age of thirteen on the Site. If we become aware that we have inadvertently received personal information from a visitor under the age of thirteen on the Site, we will delete the information from our records.

Personally Identifiable Information

You may choose to provide personal information (such as your name, address, telephone number and email address) on this Site. Here are some of the ways you may provide the information and the types of information you may submit.

(a) Contact Us

If you email us through an email or Contact Us link on this Site, we ask you for information such as your name and email address in order to respond to your questions and comments. We will only use this information to respond to your inquiry, unless you authorize additional use of your information.

(b) Subscriber Information

We collect personally identifiable information about our [Subscribers, \[1\]](#) based on: information gathered at the time of registration, Subscriber interaction and response to subsequent electronic mailings and web site use, information provided by our Clients and information appended from data aggregators. Information collected may include name, email address, postal address, gender, birth date, telephone number, cell number, activities, interests, user behavior and other demographic information. This information enables us to better tailor our content to Subscribers' needs and to help our Clients promote and sell their products and services.

Non-Personally Identifiable Information

We collect certain aggregate and non-personally identifiable information, as described below, when you visit this Site. This information does not relate to a single identifiable visitor. It tells us such things as how many users visited our Site and the pages accessed.

Log Files

Like most Web site servers we use log files. To learn more about [log files](#), [click here](#). [2] Log file information is not linked to personally identifiable information.

Web Beacons

Pages on our Site may contain "web beacons" (also known as Internet tags, pixel tags and clear GIFs). Web beacons allow third parties to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page, and the information in cookies set by the third party. We use log files to store the data that is collected through web beacons.

Use of Information

By registering on this Site, you may receive telemarketing calls in response to your inquiry. If you provide your information, you express your consent to receive calls, emails or text messages from National Satellite Systems at the phone number provided, regarding National Satellite's products or services.

The Company may use the User Information for any legally permissible purpose in Company's sole discretion. The following paragraphs describe how the Company currently uses the User Information, but the Company may change or broaden its use at any time. As noted below, the Company may update this policy from time to time. The Company may make use of User Information for telemarketing, direct mail marketing, email advertising, targeted online banner advertising and package stuffers, among other possible uses.

Targeted Advertising. Based on the User Information, the Company attempts to customize and target advertising to an individual. The Company may, at its discretion, target advertising in email and direct mail. Due to the infancy of this technology, users should not expect to see immediate changes in the types of targeted advertising they see.

Email. The Company uses User Information to provide email marketing materials to users. The Company may maintain separate email lists for different purposes. If email recipients wish to end their email subscription from a particular list, they need to follow the instructions at the end of each email message to unsubscribe from the particular list.

Direct Mail. The Company uses User Information to advertise, directly or indirectly to individuals using postal mail.

Use of Cookies. The Company may use the Cookie Information (1) to match a user's Cookie Information to Survey Information, (2) to track an individual's web browsing habits, (3) to determine which areas of our sites are most frequently visited. This information helps the Company to better understand the online habits of users so that the Company can attempt to customize and target advertising and promotions to users.

Profiles of Users. The Company uses User Information to make a profile of users of the site. A profile is created by associating the various sources of User Information.

Storage of User Information. The Company stores the User Information in a database on secure computers. Our computers have security measures (such as a firewall) in place to protect against the loss, misuse and alteration of the information under our control. But notwithstanding such measures, the Company cannot guarantee that its security measures will prevent the Company computers from being illegally accessed, and the data on them stolen or altered, and the Company assumes no responsibility for such actions. The company will store information for 24 months. You may request that your information be modified or deleted as detailed below.

Please see the opt-out procedures below if you do not want us to share your information with other companies or organizations.

Dissemination of User Information

Sale or Transfer to Third Parties. The Company may sell or transfer User Information to third parties for the purposes of sending you offers of good or services via email, postal mail and telemarketing promotions.

The Company will transfer User Information to third parties when necessary to provide a product or service that a user orders from such third party while using our sites.

Legal Process. The Company may disclose User Information to respond to subpoenas, court orders and other legal processes.

Summary Data. The Company may sell or transfer non-individualized information, such as summary or aggregated anonymous information about users of our web sites as a whole or as sub-groups of users.

Other Circumstances

We may share personal information about you:

- With our service providers and business partners who work on behalf of or with us under confidentiality agreements. These parties may use your personal information to help us communicate with you about offers from us and our Clients. These companies do not have any independent right to use or disclose your information.
- To respond to subpoenas, court orders, or other legal process, or to exercise our legal rights or defend against legal claims.
- If we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our terms of use.
- In the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use the personal information you have provided through this Site in a manner that is consistent with this Privacy Policy.

Opt-Out Policy

You may exercise your option to not receive any future communications from us by [clicking here](#). Subscribers should note that unsubscribing from this Site's electronic mailings will not automatically unsubscribe you from any communications you have elected to receive from our partners or other third parties. Please note that you may still receive information from third parties to whom we have disclosed

your information to prior to the time you opted-out. You should contact each third party in the event that you no longer want to receive information from such party.

You may request by telephone or in writing that National Satellite stop calling you and place your name on our company-specific Do Not Call list. To be added to our Do Not Call list, please call 617-965-1014, or contact us at:

Privacy Officer
CharacTell Ltd
34 Wessex Rd
Newton, MA 02459

Global Data Processing and Safe Harbor Principles

The information that we collect from you may be transferred to, stored at and processed at a destination outside of the U.S. By submitting your personal information, you agree to this transfer, storage and processing. Where the privacy laws of these countries are not as comprehensive as those in the US, we will take steps to ensure that your privacy rights are respected.

In order to bridge the different privacy approaches between the U.S. and the European Union, the U.S. Department of Commerce, in consultation with the European Commission, developed a "Safe Harbor" framework. We adhere to the Safe Harbor framework which includes the privacy principles of Notice, Choice, Onward Transfer, Access and Accuracy, Security, and Oversight/Enforcement. We are currently seeking participation in the Safe Harbor program. To learn more about the Safe Harbor, [click here](#).

Privacy Complaints

If you believe that we have not complied with this Privacy Policy, please contact us at:

Privacy Officer
CharacTell Ltd
34 Wessex Rd
Newton, MA 02459

You may also email us as much detail as possible in the ways in which you believe that this Privacy Policy has not been complied with. We will investigate your complaint promptly.

How to Access or Modify Your Information

We strive to keep all personal information accurate and complete as best we can. You can change your personal information at any time and as often as necessary. You can also request that information be deleted. Information may be withheld or exempted from deletion if this is required by law or is part of a fraud investigation, or as otherwise as described above in the Use of Information section.

You may access and modify your personal information by writing to us at:

Privacy Officer
CharacTell Ltd
34 Wessex Rd
Newton, MA 02459

Special Notification for California Residents

Individuals who reside in California and have provided their personal information may request information regarding disclosures of this information to third parties for direct marketing purposes. Such requests must be submitted to us at the following mailing address:

Privacy Officer
CharacTell Ltd
34 Wessex Rd
Newton, MA 02459

This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified above.

Links to Other Sites

We may provide links to other Web sites for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked Web sites. We are not responsible for the content of linked sites or any use of such sites.

Security

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. Although we take reasonable technological precautions to protect your data, no data transmission over the Internet can be guaranteed to be 100% secure.

Changes to This Privacy Policy

If we change this Privacy Policy, updates will be posted in this privacy statement and other places we deem appropriate. Information will be used in accordance with the privacy policy under which the information was collected. If users' personally identifiable information will be used in a manner different from that stated at the time of collection, we will notify users via email. Users will have a choice as to whether or not we use their information in this different manner.

[1] You are a subscriber if you choose to register to use any of the service we offer via the site or downloaded applications.

[2] Log files include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use.

[3] What is a cookie? A cookie is a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a web site's computer and stored on your computer's hard drive. Each web site can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a web site to access the cookies it has already sent to you, not the cookies sent to you by other sites. Many sites do this whenever a user visits their website in order to track online traffic flows. Cookies record information about your online preferences. Cookies let us know about repeat visitors and if we are delivering quality products and services to our Clients. We may also use cookies to identify which sites our repeat visitors are coming from, so that we can place more of our online advertising on these sites, and can, where necessary, pay our affiliates and other business partners. We may share this information with third parties, but only in aggregated, anonymous form, including reporting the results of advertising campaigns. Reporting and analyzing the performance of offers and advertisements improves our ability to serve the right offer at the right time, increasing the increasing the personalization of your experience on the Site.

You can set your browser to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. For further information on cookies please visit <http://www.aboutcookies.org>.

Last Updated: February, 2016.