

GroundWork's Privacy and Security Statement

Last modified: December 2012

The Highlights:

- If you visit our websites, we may collect information from you—some automatically and some that you have the option to submit.
- There are a limited number of circumstances where we may share your information with third parties (for example, pursuant to a court order, if we are part of a merger, or with our business partners and service providers who support our business or collaborate with us).
- We take the security of your information seriously and take steps to be sure your information is secure.
- Please read the full Privacy and Security Statement below and you can always contact us if you have questions.

The Details:

Introduction

GroundWork Inc. and its subsidiaries respect your privacy and are committed to protecting it through our compliance with this Privacy and Security Statement. This Privacy and Security Statement (together with our Terms of Use) describes the types of information we may collect from you or that you may provide when you visit any of our websites and how we use, protect, and disclose that information.

This Privacy and Security Statement does not apply to information collected on any third-party site or application (including advertising) that may link to or be accessible from our websites. We are not responsible for the privacy policies or data collection, use and disclosure practices of those sites. We encourage you to review the privacy policies of each site you visit.

Please read this Privacy and Security Statement carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, you can, of course, choose not to use our websites. By accessing or using any of our websites, you agree to this Privacy and Security Statement. This statement may change from time to time (see *Changes to our Privacy and Security Statement*). Your continued use of any website after we make changes is deemed to be acceptance of those changes, so please check the Privacy and Security Statement periodically for updates.

Notice about Information We Collect About You and How We Collect It

We collect several types of information from and about users of our websites.

Information You Provide to Us. As you navigate our websites, we may request that you provide us with certain information. This may include information by which you may be personally identified, such as name, employer, e-mail address or telephone number (“**personal information**”).

- Information that you provide by filling in forms on our websites. This includes information provided at the time of registering to use portions of our websites, posting material, or requesting further services.
- We may ask you for information when you report a problem with our websites, products or services.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.

Usage Details, IP Addresses and Cookies. As you navigate through and interact with our websites, we may automatically collect certain information about your equipment, browsing actions and patterns using common internet technologies, such as cookies and Web beacons, including:

- Details of your visits to our websites, including information about your connectivity, such as your IP address and browser information, location data, logs and other communication data, and the resources that you access and use on the websites.

The information we collect automatically helps us to improve our websites and to deliver better and more personalized content and services by enabling us to estimate our audience size and usage patterns and recognize you when you return to our websites.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our websites, products and services to you and continuously improve upon them.
- To provide you with information, products or services that you request from us.
- To notify you about changes to our websites, products or services (including new offerings) and promotions or events.
- To maintain the integrity of our websites.

Disclosure of Your Information

Protecting the personal information of our users is important to us and we neither rent nor sell your personal information to anyone. We may disclose or transfer personal information that we collect or you provide as described in this Privacy and Security Statement:

- To our subsidiaries and affiliates.
- To agents, contractors, service providers and other third parties we use to support our business or collaborate with and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes of providing services for or with us.
- To a buyer or other successor in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of GroundWork's assets, in which personal information held by GroundWork about our websites' users is among the assets transferred.
- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements that govern the sale or use of our products and services.
- To protect the rights, property or safety of GroundWork, our employees, our users or others.

Except as set forth in this statement, we will not share your personal information with third parties without your consent.

Onward Transfer of Your Information

To facilitate our global operations, we may transfer your personal information to, and access your personal information from, the various countries in which we operate, including the United States. We'll take appropriate measures to protect the personal information we transfer.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. Here are a couple of ways you can have control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to receive promotional e-mail messages from us, you can opt-out by sending us an e-mail stating your request to info@gwos.com. If we have sent you a promotional e-mail, you may click the Unsubscribe link located at the

bottom of the email or send an email to info@gwos.com asking to be omitted from future e-mail distributions.

Data Integrity and Proportionality

We only collect as much personal information as needed for specific, identified purposes and we will not use it in any way that is incompatible with the purpose for which it was collected or authorized by you.

Accessing and Correcting Your Information

We take reasonable steps to keep your personal information accurate and complete. You may send us an e-mail at info@gwos.com to request access to your personal information you have provided to us for the purpose of correcting, amending or deleting data that is inaccurate. We will do our best to respond to your request in a timely manner and grant your request as required by law.

Security

We take your security seriously and take reasonable steps to protect and secure your personal information from unauthorized access, use, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our websites, you are responsible for keeping this password confidential. Please do not share your password with anyone.

Although we take reasonable security measures to protect your personal information, we cannot guarantee the security of your personal information transmitted to our websites. The transmission of information via the internet is not 100% secure and we cannot ensure or warrant the security of any information you transmit to us. We are not responsible for circumvention of any privacy settings or security measures contained on the websites.

Changes to Our Privacy and Security Statement

We may amend this Privacy and Security Statement from time to time. We encourage you to revisit this page periodically to read the current version of this statement in effect.

Enforcement

If you have any concerns or questions about this statement, please contact us and we will investigate and attempt to resolve any complaints and disputes either through our internal process, or if necessary, through an independent dispute resolution mechanism.

Children Under the Age of 13

Our websites are not intended for children under 13 years of age. If you become aware that your child has provided us with personal information without your consent, please contact us at info@gwos.com and we will work to delete it. We do not knowingly collect personal information from children under 13.

Contact Information

If you have any questions or comments about this Privacy and Security Statement, please contact us by emailing us at info@gwos.com or by writing to us at:

GroundWork Inc.
Attention: Legal Department, Privacy Statement Issues
201 Spear Street, Suite 1650
San Francisco, CA 94105