# **PRIVACY POLICY**

The Customs and Trade Services, Inc. Privacy Policy was last updated February 2016. The Customs and Trade Services, Inc. Privacy Policy applies to only information collected through all of CTS International, Ltd. and/or any of its subsidiaries', which includes Customs and Trade Services, Inc. (hereinafter "CTS") websites, mobile websites or applications, or software, but not to information collected in a non-electronic or offline means. By using CTS's websites, mobile websites or applications, or software, you acknowledge that any information provided by you is provided voluntarily and subject to CTS's privacy policy, to which you explicitly agree and consent to. CTS's websites, mobile websites or applications, or software are not intended for use by users where such use is contrary or prohibited by local laws or regulations. This privacy policy is subject to change without notice and CTS is under no obligation to provide notice of any such change.

#### Registered User, Customer and Visitor Information Protection

We understand the importance of privacy to the registered users, customers and visitors (hereinafter "Customer") of CTS's website(s). Our policy is to treat what we learn about our Customers as confidential unless the information is public otherwise. We will not give or sell confidential or Personal Information (as described below) about our Customers to any third party not affiliated with CTS; except as necessary to provide or offer CTS services to the Customer, as required by law, or in connection with an investigation of possible illegality.

We use information about our Customers to provide or enhance the following: to analyze and evaluate our business strategies and decisions, the services we offer, the way we communicate about additional services Customers may find of value, to satisfy our legitimate business interests, to set prices, to fulfill our Service Agreements, to accomplish our billing functions, and to comply with all governmental regulations. Although governmental regulations vary and frequently include the reporting of information to transportation, safety, Customs, and other regulatory bodies, as a consulting firm, our governmental reporting requirements are generally minimal.

As we collect and use information about our Customers, we may contract with vendors to assist us in processing that information for those purposes listed in the previous paragraph. These vendors are required to maintain the confidentiality of the information and are restricted from using the information for any other purpose. In addition, as CTS continues to develop its business, we may buy or sell subsidiaries or business units. As part of these transactions, customer information of the subsidiaries or business units may be one of the assets that are transferred.

Examples of information that we collect include: names, addresses, e-mail addresses and telephone numbers. Some of the information collected by CTS is data which relates to an identifiable person ("Personal Information"). We do provide Personal Information to government agencies or others as required by law or regulation, and in connection with investigations of possible illegalities.

Information, including Personal Information provided as part of a Consulting Project, or any other contractual relationship whereby such information is made available or becomes

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available to CTS from a Customer, represents a record of that business transaction and is subject to CTS's Terms and Conditions. The CTS Terms and Conditions are available at <a href="http://www.taggart-intl.com/CTS/terms-conditions/">http://www.taggart-intl.com/CTS/terms-conditions/</a>.

Information disclosed to CTS IS NOT protected under any type of attorney-client privilege and is therefore subject to subpoena. If such attorney-client privilege is desired, you must contact CTS personnel prior to engagement commencement in order to determine alternative arrangements where such protection might be afforded through separate legal counsel.

## **Google Analytics & Cookies**

The CTS website uses or might use Google Analytics, a website analytics service of Google Inc. ("Google"). CTS might and Google Analytics does use so-called "cookies" which are text files that are stored on the users' computers and that allow for an analysis of their use of the website. The information generated by the cookie regarding the use of this website by the user will usually be transferred to a Google server in the US and stored there. IP anonymization has been activated on this website with the effect that the user's IP address of the user will be shortened by Google within the territory of member states of the EU or in another signatory state to the Agreement on the European Economic Area before such transfer occurs. Only in exceptional circumstances will the full IP address be transferred to a Google server in the US and shortened there. Google will use this information on behalf of the website provider in order to analyze the use of the website by the user, to compile reports on the website activities, and to provide further services in connection with the website use and internet use to the website provider. The IP address transmitted by your browser within the context of Google Analytics will not be combined with other data of Google. You can prevent the storage of a cookie by changing the settings of your browser software. However, please be advised that you might not be able to use the full functionalities of the CTS websites in such case. In addition, users may prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) by Google and the processing of such data by Google by downloading and installing the Browser Plugin available through the following link. The current link is: "http://tools.google.com/dlpage/gaoptout?hl=de."

## Information Security and Integrity

We treat our data as assets that must be protected against loss and unauthorized access. We employ information security techniques to appropriately protect confidential information from unauthorized access by users inside and outside the company.

# IP Addresses

The CTS website(s) might collect Internet Protocol (IP) addresses for system administration, security, and statistical analysis purposes. An IP address is a number that is automatically assigned to a computer whenever it is connected to the Internet. These addresses might be logged and analyzed to understand where requests originate so that we can provide the most efficient service, enhance security, ensure appropriate usage and produce traffic volume statistics to better serve our Customers.

## Retention of Customer's Information

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We retain information, including Personal Information about Customers as necessary for business purposes and as required by government regulation.

# Customers are Responsible for Protecting Information and Systems on Their Premises

Information disclosed by Customers or on their behalf, through a consulting arrangement with CTS, is typically stored in various business systems located on Customer premises. Customers concerned about the security of their information in these systems should secure it by activating passwords and using physical access controls which are consistent with all processes detailed in Customs & Border Protection's C-TPAT (Customs and Trade Partnership Against Terrorism) program.

## What Information We Collect and How We Will Use It

Visitors can access most areas of the CTS Website without revealing who they are or providing any information about themselves. However, some portions of our site require that users identify themselves in order to enable access to the information in those portions. We ask users to provide some Personal Information in the above listed situations.

## Links to Other Sites

CTS provides links to external commercial and governmental websites as a convenience to the user and for informational purposes only. The inclusion of any link does not imply CTS's endorsement of the external site company, its website, or the products and services it might promote or sell; its philosophy or stands on any issue; nor does it imply that CTS guarantees the accuracy, completeness or timeliness of the data presented. CTS does not guarantee the accuracy, completeness or timeliness of the data presented on any commercial or governmental website. CTS International, Ltd. is not responsible for the privacy practices, the content or the consequences of reliance upon the information presented on such websites. While we might believe such information to be accurate, we are making no representations or warranties, nor do we accept ably liability or responsibility for the accuracy of such information.

# Web Surveys

From time to time, we might post survey forms on the CTS website(s) to better understand our Customers' needs, and to create or improve content that responds to our Customers' suggestions. Customers may opt-out of participating in follow-up surveys or simply refuse to answer them. Agreement to such usage as detailed below is consented to by completing any Web Survey. CTS will not disclose survey response information to companies or individuals outside CTS with two exceptions:

a. Anonymous aggregated data, with all names, addresses and other individually identifiable information removed.

b. Vendors who would be required to maintain the confidentiality of the information and are restricted from using the information for any purpose other than helping to provide services to CTS.

# CTS Website Applications & User Portals

Users of CTS's website(s) and other vendor applications on the CTS website(s) that enable the purchase of products and services who choose to use credit cards for payment are

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required to provide information about themselves and their card. We use, and our Vendors might use, this information to establish accounts with the Customer and might continue to solicit future business from the Customer.

#### Consent To Receive Certain E-Mails

We send e-mail communications about CTS's products, services and special offers to Customers without prior consent. Each e-mail we send for marketing purposes enables recipients to opt-out from receiving further marketing e-mails from CTS International, Ltd. The "opt-out" functionality can also be accomplished on www.CTS-Intl.com/subscribe and selecting the option labeled, "Remove me from CTS International, Ltd. marketing e-mail communications."

## Review, Modification, and Deletion of Personal Information

Registered users can review, modify, or delete the information previously provided at the registration site by editing their information. Registered users should note that CTS will use reasonable efforts to delete user information when requested; but that some residual information may remain because of backup files, deletion logs or other data protection processes.

## **Contacting CTS**

If you have questions about this Privacy Policy, the practices of this site, or your experience on any of the CTS website(s), you should contact: <u>webmaster@taggart-intl.com</u> Suggestions, materials or comments sent, transmitted or communicated in any way to CTS that are not related to a paid consulting engagement or other paid commercial relationship with CTS; where the information is specifically agreed by all parties that such information is confidential, shall be deemed to be non-confidential. CTS shall have no obligation of any kind with respect to such suggestions, materials or comments; and it is expressly agreed by the provider of such suggestions, materials or comments that CTS shall be free to use and distribute such suggestions, materials or comments, without attribution or compensation to the providers, to others without limitation; including, but not limited to developing and marketing products incorporating the suggestions, materials or comments.

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# Governing Law

The applicable law governing this website and its content, the use of this site and any disputes arising from the use of this site is Missouri state law and all disputes will be the exclusive jurisdiction of the courts of Kansas City, Missouri, United States of America.

#### Acceptance & Right to Modify, Add or Remove Portions of the Privacy Policy

Your continued use of this site signifies your acceptance of the CTS Privacy Policy. We reserve the right to modify, add, or remove portions of this policy at any time by posting the revised policy on the CTS websites at our sole discretion. Please check this page periodically for changes.