

Capital Confirmation Inc. PRIVACY STATEMENT



Effective on: September 16, 2016

This privacy policy applies to www.confirmation.com, bba.confirmation.com, edu.confirmation.com, and www.creditconfirm.com ("Confirmation Web Sites") owned and operated by Capital Confirmation, Inc. ("Capital Confirmation"). This privacy policy describes how Capital Confirmation collects and uses the personal information you provide on the Confirmation Web Sites. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

1. What personally identifiable information (PII) and protected health information (PHI) Capital Confirmation collects.
2. What personally identifiable information third parties collect through the Web site.
3. What organization collects the information.
4. How Capital Confirmation uses the information.
5. With whom Capital Confirmation may share user information.
6. What choices are available to users regarding collection, use and distribution of the information.
7. What types of security procedures are in place to protect the loss, misuse or alteration of information under Capital Confirmation's control.
8. How users can correct any inaccuracies in the information.

U.S. - Swiss Safe Harbor Framework

Capital Confirmation complies with the U.S. – Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from Switzerland. Capital Confirmation has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Capital Confirmation's certification, please visit <https://safeharbor.export.gov/swisslist.aspx>.

EU-U.S. Privacy Shield

Capital Confirmation and its subsidiary companies (Confirmation Technology Services LLC, Confirmation.com UK Pvt. Ltd., Confirmation.com India Pvt. Ltd., Confirmation.com Japan Kabushiki Kaisha) participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Capital Confirmation is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List. [<https://www.privacyshield.gov/list>]

Capital Confirmation is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Capital Confirmation complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Capital Confirmation is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Capital Confirmation may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website [<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>], you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Information Collection and Use

Information Collection

Capital Confirmation is the sole owner of the information collected on the Confirmation Web Sites. Capital Confirmation collects information from our users at several different points on the Confirmation Web Sites.

Registration

In order to use the Confirmation Web Sites, a user must first complete the registration form. During registration a user is required to give professional and personal contact information (such as name and email address). We use this information to validate our users, and to therefore grant access to our service. We also ask our accounting customers to provide their CPA registration/credentialing information in order to validate his/her status to include employment verification.

Order

We request information from the user on our order form. A user must provide contact information (such as name, email, and shipping address) and financial information (such as credit card number, expiration date). This information is used for billing purposes and to fill customer's orders. If we have trouble processing an order, the information is used to contact the user.

Third party information is collected on the site (such as client information entered for the purpose of conducting confirmations of accounts) The following are the types of information that are requested for a client: contact information, client's name, client contact name, client address, client contact's email address. This information is used to validate the client users of the service. A welcome email is generated to the clients to notify them that they have been set up on the service by their accountant and to provide them notification of their initial security codes. These emails are only used for the primary purpose of providing the service of the site and are not used for any secondary purposes.

Information Use

Capital Confirmation, through its on-line service production Confirmation Web Sites , collects three types of information:

1. Demographic Information
2. Customer Financial Information
3. Protected Health Information (PHI)

Demographic Information is stored on our system. While in use, the information is used to validate the user, and to determine access permissions. The customer is free to modify this information at any time.

Customer Financial Information includes certain bank/company balance information that is stored in our database on a temporary basis, and credit card payment information provided by the customer at the time of the payment for the provision of services.

PHI may be stored on our system as a document attachment to a legal confirmation request when/if this information is deemed pertinent to the legal confirmation audit.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at Customer.Support@confirmation.com (www.confirmation.com, bba.confirmation.com, www.creditconfirm.com) or EDCustomer.Support@confirmation.com (edu.confirmation.com). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

All Customer Financial information or legal confirmation attachments containing PHI residing within Capital Confirmation's secure processing controls will be maintained and stored according to our stated security and privacy policies. Capital Confirmation takes no responsibility for Customer Financial Information once this data is no longer within Capital Confirmation's control (e.g., data downloaded by user, or mailed confirmations). The Confirmation Web Sites serve the function of an on-line provider of balance assurance services for its customers. This service is designed for use by accountants in their conduct of audit procedures as described by generally accepted accounting principles (GAAP).

Profile

We store information specifically given to us by our users through the account set up process, and or the account edit process. In addition, we store IP Address, browser type, Internet service provider (ISP) and access times. We do not store information provided through the use of cookies. A profile is stored information that provides the company with information describing the end user of our service. All such collected information is used only for the conduct of the provision of our service.

Cookies and Other Tracking Technologies

We Capital Confirmation and our analytics or service providers use cookies or similar technologies in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies for to remember users' settings (e.g. language preference), for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

Third Party Advertising

The Confirmation Web Sites do not display or solicit any third party advertising at any time.

Online Advertising

We use Google AdWords, Google Analytics, Google Display Network, Adobe Analytics, and HubSpot to track user behavior and manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Log Files

Like most standard Web site servers we use log files. This includes Internet protocol (IP) addresses, browser type and Internet service provider (ISP), referring/exit pages, operating system and access time. Capital Confirmation and its production Confirmation Web Sites, use log files only to track errors in the system. Log file information is not tied to a user's personally identifiable information.

Information Collected for our Clients

Capital Confirmation collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to the Capital Confirmation's Client (the data controller). If requested to remove data we will respond within 30 days.

We will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. Capital Confirmation will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Communications from the Site

Updates

We send all new members a welcome email. We will from time to time send email notification, mail or call you to provide you with information concerning updates or enhancements to our service. The communications are not promotional in nature as they are strictly related to the use of our service.

Customer Service

We communicate with users on a regular basis to provide requested services, and in regard to issues relating to their account we reply via email or phone in accordance with the user's wishes.

Service-related Announcements

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email.

Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

Sharing

We will share your personally identifiable information or legal confirmation attachments containing PHI with third parties

only in the ways that are described in this privacy policy. We do not sell your personally identifiable information or legal confirmation attachments containing PHI to third parties.

Legal Disclaimer

In certain situations, Capital Confirmation may be required to disclose personal data or legal confirmation attachments containing PHI in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Though we make every effort to preserve user privacy, we may also need to disclose personally identifiable information or legal confirmation attachments containing PHI when required by law such as to comply with a subpoena, bankruptcy proceedings, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Aggregate Information (non-personally identifiable)

We do not share aggregated demographic information with our partners and advertisers. These are the instances in which we will share users' personally identifiable information or legal confirmation attachments containing PHI:

Third Party Intermediaries

We use an outside credit card processing company, PayFlow, to bill users for services. This company does not retain, share, store or use personally identifiable information for any secondary purposes.

Business Transitions

In the event Capital Confirmation goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, users' personally identifiable information or legal confirmation attachments containing PHI will, in most instances, be part of the assets transferred. Users will be notified via prominent notice on our Web site for 30 days prior to a change of ownership or control of their personally identifiable information or legal confirmation attachments containing PHI. If as a result of the business transition, the users' personally identifiable information or legal confirmation attachments containing PHI will be used in a manner different from that stated at the time of collection they will be given choice consistent with our notification of changes section prior to the information being used for the new purposes.

Surveys & Contests

From time-to-time our site requests information from users via surveys or contests. Participation in these surveys or contests is completely voluntary and the user therefore has a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information (such as zip code). Contact information will be used to notify the winners and award prizes. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site. Users' personally identifiable information is not shared with third parties unless we give prior notice and choice. Though we may use an intermediary to conduct these surveys or contests, they may not use users' personally identifiable information for any secondary purposes.

Security

This Web site takes every precaution to protect our users' information. When users submit sensitive information via the Web site, their information is protected both online and off-line.

The Confirmation Web Sites are entirely encrypted and protected using 256 bit encryption with a public RSA 2048 bit key for SSL Extended Validation Certificates with Server Gated Cryptography by VeriSign for internet communications. This means that when our registration/order form asks users to enter sensitive information (such as credit card number), that information is encrypted using the best encryption software in the industry. While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Our employees must use password-protected screen-savers when they leave their desk. When they return, they must re-enter their password to regain access to user information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Every quarter as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure our users' information is protected. Finally, the servers that store personally identifiable information are in a secure environment, in a hardened hosting facility.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

If users have any questions about the security at our Web site, users can send an email to: Customer.Support@confirmation.com (www.confirmation.com, bba.confirmation.com, www.creditconfirm.com) or EDCustomer.Support@confirmation.com (edu.confirmation.com).

Supplementation of Information

In order for this Web site to properly fulfill its obligation to users it is necessary for us to supplement the information we receive with information from 3rd party sources.

ID, Credentialing Verification

We use outside sources to verify a user's accounting credentials to validate that users access to our system.

Correcting/Updating/Deleting/Deactivating Personally Identifiable Information

Upon request Capital Confirmation will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. If your personally identifiable information changes (such as zip code, phone, email or postal address), or if you no longer desire our service, we provide a way to correct, update or delete/deactivate users' personally identifiable information. This can be done on the edit profile tab or by emailing our Customer Support at Customer.Support@confirmation.com (www.confirmation.com, bba.confirmation.com, www.creditconfirm.com) or EDCustomer.Support@confirmation.com (edu.confirmation.com). We will respond to your request to access within 30 days.

Social Media Widgets

Our website includes Social Media Features, such as the Facebook Like button, and Widgets, such as the Share This button or interactive mini-programs that run on our website. These Features may collect your Internet protocol address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy statement of the company providing it.

Testimonials

We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at Customer.Support@confirmation.com (www.confirmation.com, bba.confirmation.com, www.creditconfirm.com) or EDCustomer.Support@confirmation.com (edu.confirmation.com).

Links to 3rd Party Sites

Our Site includes links to other Web sites whose privacy practices may differ from those of Capital Confirmation. If you submit personally identifiable information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy statement of any Web site you visit.

Notification of Changes

If we decide to change our privacy statement, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy statement under which the information was collected.

If, however, we are going to use users' personally identifiable information in a manner different from that stated at the time of collection we will notify users via email prior to the change becoming effective. Users will have a choice as to whether or not we use their information in this different manner. However, if users have opted out of all communication with the site through deactivating their account, then they will not be contacted, nor will their personally identifiable information be used in this new manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our Web site prior to the changes taking effect. In some cases where we post a notice we will also email users, who have opted to receive communications from us, notifying them of the changes in our privacy practices.

Contact Information

If users have any questions or suggestions regarding our privacy statement, please contact us at:

Phone: (615) 844-6222 Fax: (615) 376-7971

Email: Customer.Support@confirmation.com (www.confirmation.com, bba.confirmation.com, www.creditconfirm.com) or EDCustomer.Support@confirmation.com (edu.confirmation.com)

Postal Address: 214 Centerview Drive, Suite 265 Brentwood, Tennessee - 37027