ONLINE PRIVACY POLICY

INTRODUCTION

BI WORLDWIDE ("BIW") complies with the U.S.-EU Safe Harbor Framework and 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 information from European Union member countries and Switzerland. BIW 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 BIW’s certification, please visit http://www.export.gov/safeharbor/.

BIW controls this site and treats the privacy of individuals registering on this site with the utmost importance. This online privacy policy ("Privacy Policy") discloses the current privacy practices employed by this site. This Privacy Policy addresses how BIW uses and protects the information that BIW collects directly from you, receives from your employer or the company sponsoring this website and the underlying program ("BIW Customer") as part of the services provided by BIW. This Privacy Policy does not apply to the practices of companies and their employees with whom this site is not affiliated by ownership or control.

By using this site, you are agreeing to the terms of this Privacy Policy

PURPOSE OF DATA COLLECTION

Individuals may be requested to provide Personally Identifiable Information ("PII") and/or Sensitive Personal Information ("SPI") during the use of this site to enable BIW to fulfill the requirements of the services provided by BIW ("Underlying Program"). PII refers to information that is (a) about, or pertains to a specific individual; (b) can be linked to that individual; and (c) is captured in any form. Examples of PII include, but are not limited to, name, home address, email, etc. SPI refers to personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, social security number or other government issued ID, credit card number, or information that concerns an individual’s health. PII and SPI is collectively referred to as "Information".

PII collected from individuals is used to create and administer individual accounts, including for purposes of account verification if an individual loses or forgets their password. PII may also be used to contact an individual via e-mail or print communications regarding special promotional offers, or may be used to contact an individual regarding any issues that may arise during the operation of this site or the underlying program.

PII may be used for purposes of delivery of awards to individuals. If this site includes the ability to redeem points for, or receive merchandise or travel awards, the individual will, as appropriate, receive communications with information about the transaction (such as order or shipment confirmation) or special promotions. An individual's phone number may be required in the event that an individual needs to be contacted if there is a problem with an order.

When an individual logs onto the internet, the individual will be assigned an IP (Internet Protocol) address by an ISP (Internet Service Provider). Web sites can determine the IP address an individual is using when accessing the site. The IP address may be used to help diagnose problems with this site, or for security purposes.

ACTIVITY TRACKING

The site may track and analyze non-identifying, aggregate, usage and quantifiable statistical information from visitors ("Statistical Information") in order to constantly improve the quality of service and site performance. Statistical Information gathered includes items such as: the activity of your browser when you are viewing the site, the site path of your visit, and the time of day you visit the site. Statistical Information is not PII or SPI; only general information regarding activity within the site. BIW reserves the right to share Statistical Information with BIW Customers. This site ignores web browser "do not track" signals. This site does not pass along PII to third parties as part of any tracking technologies developed by BIW.

BIW may use third party tracking technologies or activities arising out of them in conjunction with this site. For example, this site may use Google Analytics.

See http://www.google.com/analytics/ for more information about Google Analytics

To opt-out of Google Analytics for the web, visit the Google Analytics opt-out page at http://tools.google.com/dlpage/gaoptout and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser.
This site restricts access to databases, firewalls, passwords, physical access controls, logical access controls, change control procedures, data confidentiality mechanisms to ensure that data you provide is kept secure.

This site has security measures in place to help protect against the loss, misuse, and alteration of the information under its control. When you provide PII and/or SPI via the Internet, and you access the site using a web browser capable of supporting Secure Socket Layer (SSL) technology, your Information is protected by using both server authentication and data encryption. This site also employs a variety of other mechanisms to ensure that data you provide is not lost, misused, or altered inappropriately. These controls include, but are not limited to, firewalls, passwords, physical access controls, logical access controls, change control procedures, data confidentiality policies, and regular database backups.

This site restricts access to PII and SPI gathered through the site to employees who require access to Information for the purposes of

USE AND TRANSFER TO THIRD PARTIES OF PERSONAL INFORMATION

PII and SPI will not be sold or provided to any third parties except as provided in this Privacy Policy, requested by you, or as may be required by law. You have the right to "opt out" if you do not want your PII transferred to third parties as necessary to operate the Underlying Program, but your experience and/or participation in the Underlying Program may thereafter be limited. BIW will not transfer SPI to third parties unless you first receive an express "opt in" choice.

The use by, and disclosure to third parties of PII and/or SPI in conjunction with the operation and management of this site or Underlying Program is restricted to necessary functions of this site and for the performance of the Underlying Program by BIW for BIW Customer, and is limited to the least amount of Information necessary for that third party to perform its function. Examples: An individual’s name and address may need to be shared with a third party shipping company, or a credit card number may be required by a payment processing company. Information will not be disclosed to a third party unless the third party subscribes to the Safe Harbor Privacy Principles, or BIW has entered into a written agreement with such third party to provide at least the same level of privacy protection as required by the relevant principles.

INFORMATION PROVIDED TO BIW CUSTOMERS

When an individual enrolls in this site, an individual either completes an enrollment profile, or BIW Customer provides the data via a secure data file exchange. Information collected from the enrollment profile will be shared with BIW Customers except for coalition loyalty programs for which the following shall apply:

- Upon enrolling in a coalition loyalty program involving more than one BIW Customer, an individual shall have the choice to opt-in to receive informative emails about BIW Customer products and services directly from BIW Customers.
- If an individual chooses not to opt-in to receive informative emails, BIW Customers will not receive that individual’s email address.
- Subsequent to enrolling, an individual may opt-in to receive BIW Customer emails through the site.
- The individual will need to unsubscribe from communications received directly from BIW Customers via the relevant message’s unsubscribe link.

COOKIES

This site may utilize "cookies" to improve individual experience on our site. Cookies are small bits of important information that are stored by the individual’s web browser on the individual’s computer hard drive. These cookies are used to enhance site usability and personalization, and to assist in site navigation. These cookies contain only information that an individual has supplied to this site. These cookies do not read other data from an individual’s computer or share information with cookies from other sites. Cookies may remain on an individual’s computer after the individual’s web browser session has expired to assist an individual when the individual returns to this site.

Ads may occasionally be placed on this site. These ads may also contain cookies and appear to be coming from this site, but are in fact, coming from sponsoring customers or other parties who are presenting ads on this site.

You can configure your web browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Each web browser is different, so check the "help" menu of your web browser to learn how to change your cookie preferences. If an individual rejects all cookies, an individual may not be able to use some or all of the features of this site.

SECURITY OF INFORMATION

Your information is stored on our servers located in the United States. We treat data as an asset that must be protected and we employ many advanced technical tools to protect your Information against unauthorized access and disclosure.

This site has security measures in place to help protect against the loss, misuse, and alteration of the information under its control. When you provide PII and/or SPI via the Internet, and you access the site using a web browser capable of supporting Secure Socket Layer (SSL) technology, your Information is protected by using both server authentication and data encryption. This site also employs a variety of other mechanisms to ensure that data you provide is not lost, misused, or altered inappropriately. These controls include, but are not limited to, firewalls, passwords, physical access controls, logical access controls, change control procedures, data confidentiality policies, and regular database backups.

This site restricts access to PII and SPI gathered through the site to employees who require access to Information for the purposes of
administration. These employees are limited in number, and are bound by the site’s privacy and security policies. We also require that our employees execute comprehensive nondisclosure agreements with us to protect individuals’ confidential information.

**REVIEW AND CHANGE OF PERSONAL INFORMATION**

An individual can correct, amend or delete portions of their *Information* via the site interface or by utilizing their corporate update process, depending on how the original information was received. While reasonable efforts are made to ensure data integrity throughout all systems supporting this site, some *Information* may be transferred to other protected databases not connected to this site but controlled by **BIW**. As a result, some corrections, amendments, or deletions may take longer to process than others, but will occur within a reasonable timeframe. **BIW** takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete and current.

**ACCEPTANCE OF PRIVACY POLICY TERMS AND CONDITIONS**

By visiting this site, individuals agree to the practices described in this **Privacy Policy**. To the extent that any of the third-party sites accessible through this site have different privacy practices from those stated in this **Privacy Policy**, those third-party privacy practices govern the collection and use of information an individual provides when visiting those sites. **BIW** is not responsible for the security or privacy practices of these other sites, the products or services offered by these other sites, or the content appearing at these other sites. If you access a linked site, it is your responsibility to read the policy statement of the other site to understand their policies, and to act accordingly to keep your *Information* private and confidential.

**CHANGES TO THIS ONLINE PRIVACY POLICY**

On occasion, it may be necessary to change the terms and conditions of this **Privacy Policy**. To ensure that an individual is aware of current privacy practices, it is recommended that individuals check this site’s **Privacy Policy** periodically. This site will not materially expand how it handles previously collected information without providing notice, and the choice to opt-out as appropriate, to individuals before the **Privacy Policy** is materially expanded.

**CONTACTING THE WEB SITE ADMINISTRATOR**

If you have any questions, inquiries or complaints regarding this **Privacy Policy** or the use of your *Information*, please use the “Contact Us” link on the site; contact us by mail at BI WORLDWIDE, 7630 Bush Lake Road, Minneapolis, Minnesota 55439.