## **BOC Website Privacy Policy**

We respect your privacy and are committed to protecting personally identifiable information you may provide us through our Website. We have adopted this Privacy Policy ("Privacy Policy") to explain what information may be collected on our Website, how we use this information, and under what circumstances we may disclose the information to third parties. This Privacy Policy applies only to information we collect through our Website and does not apply to our collection of information from other sources.

This Privacy Policy, together with the Terms of Use posted on our Website, sets forth the general rules and policies governing your use of our Website. Depending on your activities when visiting our Website, you may be required to agree to additional terms and conditions.

We generally keep this Privacy Policy posted on our Website and you should review it frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy. WHEN YOU ACCESS OUR WEBSITE, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITE. If, at any point, we decide to use your personally identifiable information in a manner materially different than what was stated at the time it was collected, we will notify users of this change by e-mail to the last e-mail address provided to us. Users will have a choice (by means of an opt out opportunity) as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected if you opt out of the new policy.

#### A. Collection of Information:

Our Website does not automatically collect any individually identifiable information from visitors, such as email addresses, and you do not have to give us personal information to visit our site. If you choose not to provide personal information, you can still visit <a href="https://www.bocnet.org">www.bocnet.org</a> pages.

We may collect personally identifiable information only if specifically and knowingly provided by you. At the BOC Website you may be able to register and create a user profile for courses or events, subscribe to an email newsletter, sign up for broadcast email, take part in message boards or chat, participate in polls or surveys, or make a donation. In so doing, you may be asked to provide personally identifiable information such as your name, address, email address, telephone number, fax number, credit card information, or information about your interests and activities.

We make every effort to ensure that the information presented is accurate. However, if inaccuracies occur or if your personal information changes, we will make every effort to correct them in a timely manner. To report any inaccuracies or to update your user profile, please email us at info@bocnet.org or write to Business Outreach Center Network, Inc., 85 South Oxford Street, Brooklyn, NY 11217.

# B. Use of Information;

Personally identifying information collected by us will be used only in connection with www.bocnet.org, or for such purposes as are described at the point of collection.

We will protect the personal information that you provide through <a href="www.bocnet.org">www.bocnet.org</a>. We will not disclose, give, sell, or transfer any such personal information to third parties, unless necessary to complete the transaction you initiated and then only to the extent necessary. If we share demographic information with third parties, we will give them aggregate information only. Notwithstanding the foregoing, we specifically reserve the right to disclose personally identifiable information to law enforcement personnel in response to a subpoena, warrant, court order, or in other appropriate situations.

We may use the information you give us to provide services to you, at your request. We may use it to communicate with you through periodic messages regarding services, events, and other information and notices we believe you may find interesting or useful. We may use it for confirmation of donations, registrations, or other actions you take on our site, and for related customer service needs.

We recognize and respect your right not to be included in such communications. You may opt out of receiving such mailings whenever personal information is solicited and we will honor your choice. Please email us at info@bocnet.org or call us at 718-624-9115, if you do not wish to receive any information.

<u>www.bocnet.org</u> may perform analyses of user behavior in order to measure customer interest in the various areas of our sites. We may use the information that is not personally identifiable to analyze the design and functioning of our site in order to make site improvements. We may use such information in the aggregate to analyze site usage.

<u>www.bocnet.org</u> may also use listserves and email services to send out information and change notices to subscribed users of our sites.

#### C. Other Uses & Information

## (1) IP Addresses:

An IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet. Web servers (computers that "serve up" web pages) automatically identify your computer by its IP address. When visitors request pages from our Website, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others, and to track the use of our Website. IP addresses are considered non-personal information and may also be shared as provided above. It is not our practice to link IP addresses to anything personally identifiable; that is, the visitor's session will be logged, but the visitor remains anonymous to us. However, we reserve the right to use IP addresses to identify a visitor when we feel it is necessary to enforce compliance with our Website rules or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website, or other users; or (d) in an emergency to protect the health and safety of our Website's users or the general public.

#### (2) Cookies, etc.:

This Website may also collect information about you in part through the use of "cookies" — that is, small text files placed on your computer's hard drive. Cookie technology shares basic information about your computer and Internet connections. Collecting this basic information helps BOC streamline your experience on our website — for example, helping us diagnose problems with our server, administering our web site, or by "automatically" filling out forms for you.

If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our Website will not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

# (3) Email Communications:

If you send us an email with questions or comments, we may use your personally identifiable information to respond to your questions or comments, and we may save your questions or comments for future

reference. For security reasons, we do not recommend that you send non-public personal information, such as passwords, social security numbers, or bank account information, to us by email. However, aside from our reply to such an email, it is not our standard practice to send you email unless you request a particular service or sign up for a feature that involves email communications, it relates to purchases you have made with us (e.g., product updates, customer support, etc.), we are sending you information about our other products and services, or you consented to being contacted by email for a particular purpose. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us; that is, agree to some communications but not others. You may "opt out" of receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of most emails we send, or as provided below; provided, however, we reserve the right to send you transactional emails such as customer service communications.

# (4) Transfer of Assets:

As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the personally identifiable information and non-personal information we have about you will be transferred to and used by this acquiring entity, though we will take reasonable steps to ensure that your preferences are followed. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

#### (5) Other:

Notwithstanding anything herein to the contrary, we reserve the right to disclose any personally identifiable or non-personal information about you if we are required to do so by law, with respect to notices and counternotices pursuant to our DMCA notice and takedown policy and procedures and/or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website, or other users; or (d) in an emergency to protect the health and safety of our Website's users or the general public.

#### D. Public Forums;

We may offer chat rooms, message boards, bulletin boards, or similar public forums where you and other users of our Website can communicate. Please be aware that when you provide information on bulletin boards, chat rooms, and similar interactive portions of this site, you are making such information available to others. Please use prudence and good sense when participating in such interactive portions of the site. To the extent others post their information in such interactive settings, you agree to use such information only to the extent and for the purpose permitted by such person.

The protections described in this Privacy Policy do not apply when you provide information (including personal information) in connection with your use of these public forums. We may use personally identifiable and non-personal information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and may be seen or collected by anyone, including third parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the distribution of any information you choose to publicly post or share through our Website.

## E. Children;

The features, programs, promotions and other aspects of our Website requiring the submission of personally identifiable information are not intended for children. We do not knowingly collect personally identifiable information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us please contact

us at <a href="mailto:privacy@bocnet.org">privacy@bocnet.org</a>. A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use thereof.

# F. Keeping Your Information Secure;

While BOC will make every attempt to protect the personal information that you share with us, electronic mail is not secure against interception. If your communication is very sensitive, you may want to send it by postal mail instead.

<u>www.bocnet.org</u> uses appropriate procedures to ensure the security of personal information and to protect it from unauthorized access. In particular, we use a third party vendor when we ask you to enter credit card information, which follows industry standard security protection, including encryption, SSL transmission connection, and a secure server for information storage. Your credit card information is not stored on our servers.

We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your personally identifiable information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information. In the unfortunate event that your "personally identifiable information" (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) is compromised, we may notify you by e-mail (at our sole and absolute discretion) to the last e-mail address you have provided us in the most expedient time reasonable under the circumstances; provided, however, delays in notification may occur while we take necessary measures to determine the scope of the breach and restore reasonable integrity to the system as well as for the legitimate needs of law enforcement if notification would impede a criminal investigation. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

## G. Links to Third Party Sites;

This website contains some hyperlinks to web sites operated by parties other than BOC. These hyperlinks are provided for your convenience only. BOC does not control or endorse such third-party websites and is not responsible for their content, including their privacy policies. Please be aware that third party websites may collect personal information from you and BOC has no control over such information collected or the use of such information collected.

## H. Contact & Opt-Out Information;

You may contact us as at <a href="mailto:privacy@bocnet.org">privacy@bocnet.org</a> if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any personally identifiable information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your personally identifiable information with others.

We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Website.

# I. Sole Statement;

This Privacy Policy as posted on this Site is the sole statement of our privacy policy with respect to this Site, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Site.

BOC may occasionally update this policy. Notice of revisions will be posted here.

We want to be very clear: We will not obtain personally identifying information about you when you visit our site, unless you choose to provide such information. This Privacy Policy should be read in conjunction with the Terms of Use for our sites.