

## PRIVACY POLICY

Arrow Companies, LLC (Arrow) considers the privacy of its Users to be a serious issue. Please read the following to learn more about our Privacy Policy. Arrow Companies, LLC is a Limited Liability Corporation based in Elkhorn Wisconsin. Our Web Site is located at <http://www.arrowcompaniesllc.com>.

Our privacy policy covers Arrow and all its Web sites or hosted Web sites:

Arrow Companies, LLC  
310 O'Connor Drive  
Elkhorn, WI 53121  
United States  
Phone: (262) 741-1660  
Fax: (262) 723-6750

<http://www.arrowcompaniesllc.com>

### 1. WHAT THIS PRIVACY POLICY COVERS

This policy covers how Arrow treats personal information that Arrow collects and receives, including information related to past use of Arrows' Web Site products and services. Personal information about Users that is personally identifiable like your name, address, email address, or phone number, and that is not otherwise publicly available. This policy does not apply to the practices of companies that Arrow does not own or control or to people that Arrow does not employ.

### 2. INFORMATION COLLECTION AND USE

#### General

Arrow collects personal information whenever a User registers with Arrow, when you use products or services, when you visit Arrow websites or the websites of certain Arrow partners. Arrow may combine information about you that we have with information we obtain from business partners or other companies. When you register we ask for information such as your name, email address, birth date, gender, zip/postal code, occupation, industry, and personal interests.

Once you register with Arrow and sign in to our services, you are not anonymous to us. Arrow automatically receives and records information on our server logs from your browser, including your IP address, Arrow cookie information, and the page you request. Arrow uses information for the following general purposes: to customize the advertising and content you see, fulfill your requests for products and services, improve our services, contact you, conduct research and development, provide anonymous reporting for internal and external clients, and for marketing, customer administration and technical Web Site administration purposes. See Table A. below for a listing of the types of personal data collected and the purposes for which such data is collected.

#### Children

When a child under age 13 attempts to register with Arrow, we ask that he or she has a parent or guardians create an Arrow Account and obtain parental permission. Arrow will not contact children under age 13 about special offers or for marketing purposes without a parent's permission. Arrow does not ask a child under age 13 for more personal information, as a condition of participation, than is reasonably necessary to participate in a given activity or promotion. These reasonable efforts are intended to ensure that a parent has authorized the collection of the child's personal data for our internal use and disclosure to third parties.

### **3. INFORMATION SHARING AND DISCLOSURE**

Arrow does not rent, sell, or share personal information about you with other people or nonaffiliated companies except to provide products or services you've requested, when we have your permission, or under the following circumstances:

- We provide the information to trusted partners who work on behalf of or with Arrow under confidentiality agreements. These companies may use your personal information to help Arrow communicate with you about offers from Arrow and our marketing partners. However, these companies do not have any independent right to share this information.
- We have a parent's permission to share the information if the User is a child under age 13. Parents have the option of allowing Arrow to collect and use their child's information without consenting to Arrow sharing of this information with people and companies who may use this information for their own purposes;
- We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- We believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Arrow's terms of use, or as otherwise required by law.
- We transfer information about you if Arrow is acquired by or merged with another company. In this event, Arrow information about you is transferred and becomes subject to a different privacy policy. Arrow will use reasonable efforts to ensure that your personal data is not disclosed to State/provincial, national, regional institutions and authorities, unless required by law or other regulation.

### **4. PURPOSE FOR COLLECTION**

We do not collect or use personal data for any purpose other than those purposes indicated when you provide informed consent at the time of collection. Table A. below provides a complete listing of the types of personal data collected and the purposes for which such data is collected, used and disclosed.

### **5. COOKIES**

Arrow may set and access Arrow cookies on your computer. Arrow uses web beacons to access Arrow cookies inside and outside our network of web sites and in connection with Arrow products and services.

## **6. YOUR ABILITY TO ACCESS, EDIT AND DELETE YOUR ACCOUNT INFORMATION AND PREFERENCES**

### **General**

You can edit your Arrow Account Information at any time. Users who visit Arrow Web Sites can opt out of receiving future marketing communications regarding these new categories or they can unsubscribe by following instructions contained in the messages they receive. Certain communications from Arrow, such as service announcements, administrative messages and the Arrow Newsletter, are considered part of Arrow membership and you may not opt out of receiving them. You can delete your Arrow Account by contacting Arrow.

### **Children**

Parents can review, edit, and delete information relating to their child's Arrow account using tools offered by Arrow Accounts. If a parent chooses not to allow Arrow to further collect or use a child's information, parents enrolled in Arrow Accounts can delete their child's account by contacting Arrow.

### **Access**

Upon a request accompanied by reasonable proof of your identity, Arrow will, without any charge, provide you with a readable copy of the personal data which we keep about you. We allow you to challenge the data that we hold about you and, where appropriate, you may have the data erased, rectified, amended or completed. Although We reserve the right to refuse to provide our visitors with a copy of their personal data, we will give reasons for any such refusal. We do, however, allow you to challenge our decision to refuse to provide you with a copy of your personal data. You may contact us using the information listed in Section 10 of this Agreement (.Privacy Support and Contact Information.) to request access to, changes to or deletion of your personal information.

## **7. CONFIDENTIALITY AND SECURITY**

We limit employee access to your personal information to those employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs. We also employ physical, electronic, and procedural safeguards that comply with federal regulations to protect personal information. Your Arrow Account Information and Profile are password-protected. In Certain areas of our Web Site, such as the Account, Profile and any transactions areas, Arrow uses industry-standard SSL encryption to protect data transmissions.

## **8. CHANGES TO THIS PRIVACY POLICY**

Arrow may update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your Arrow Account or by placing a prominent notice on our Web Site.

## **9. COMPLIANCE**

Arrow will try to resolve privacy related concerns.

## **10. PRIVACY SUPPORT AND CONTACT INFORMATION**

If you have questions or suggestions, please contact us using the information provided below:

Arrow Companies, LLC  
Customer Care - Privacy Policy Support  
Privacy Support Officer  
310 O'Connor Drive  
Elkhorn, WI 53121  
United States  
Phone: (262) 741-1660  
Fax: (262) 723-6750

**TABLE A**  
**Data Type and Purpose**

Data Type	Technical Administration of the Web Site	Research & Development	Customer Administration	Marketing	Trading in Personal Data
<b>Primary Personal Data</b>					
Name	X	X	X	X	X
Gender	X	X	X	X	X
Address	X	X	X	X	X
E-mail address	X	X	X	X	X
Phone/Fax number	X	X	X	X	X
<i>Profession</i>	X	X	X	X	X
<b>Business Information</b>					
Employer/organization	X	X	X	X	X
Job title	X	X	X	X	X
Address	X	X	X	X	X
E-mail address	X	X	X	X	X
Phone/Fax number	X	X	X	X	X
<b>Personal Information</b>					
Personal details	X	X	X	X	X
Physical description	X	X	X	X	X
Family characteristics	X	X	X	X	X
Education and skills	X	X	X	X	X
Life style or personal tastes	X	X	X	X	X
Financial resources	X	X	X	X	X
<b>Identifiers</b>					
On-line identifiers	X	X	X	X	X
Biometrics identifiers	X	X	X	X	X