

## Privacy Policy

Effective Date: 17th February 2017

Resolutions values your privacy and desires to ensure your experience with Resolutions and all our websites and all our related subdomains (the "Sites") and all our products, software, blogs, forums, channels and sharing services (collectively with the Sites) are as satisfying and safe as possible. In that regard, we have established for the Sites and/or Services the following privacy policy to explain and describe what personal information Resolutions collects on our Sites, how Resolutions uses it and your options regarding information Resolutions may collect about you. By accepting this Privacy Policy, you expressly consent to the information handling practices described in this Policy. This Privacy Policy is a part of and incorporated into Resolutions Terms of Use and End-user License Agreements associated with its Sites. In addition, by accepting this Privacy Policy you expressly represent: (a) that you are over the age of 18 and/or not considered a minor in the jurisdiction in which you reside; or (b) that you are a parent or guardian of a minor child and that you have expressly consented to handling of the minor's personal information as described in this Policy. Your continued use of our Sites and/or Services or any other content, products or other services covered by this Policy constitutes your acceptance and agreement to this Policy and any updates.

### Contact Us

If you have questions about this policy, please feel free to contact us at:

Resolutions  
Meadowcroft,  
Scoulton, Norwich,  
Norfolk, NR9 4AQ, United Kingdom  
Email: [enquiries@resolutions.org.uk](mailto:enquiries@resolutions.org.uk)

We collect Personal Information in two ways. Firstly, we collect information you provide to us in optional, voluntary submissions, such as in registration forms, user profiles, promotional signups, requests for customer service and software downloads. Secondly, some Personal Information may be collected automatically. This is described below in "Passive Data Collection."

We may also obtain information, including Personal Information, from third-party sources. If we directly combine information from third parties with Personal Information that we have collected, we will treat the combined information as Personal Information and handle it in accordance with this Policy. In addition, please note that we may solicit third parties to collect Personal Information on our behalf and in such cases, we instruct those third parties to comply with this Policy and all applicable data protection laws.

Please be aware that we are prohibited from allowing a child's participation in any activity or that child disclosing more personal information than is reasonably necessary to participate in that activity. You are under no obligation to provide, and can decline to provide, any requested information at any time. However, if you decline to provide personal information that is reasonably necessary to participate in certain activities, you may not be able to participate in those activities on certain Sites and/or Services.

### 1. Information We Collect

In describing our collection, use, and sharing of information in this Policy, we refer to our collection and use of "Personal Information." "Personal Information," as used in this Policy, is personally identifiable information, which is information that directly identifies an individual, such as first and last name, mailing address, email address, billing information, IP addresses, demographics, passwords or other

online contact information, or telephone number. We collect Personal Information, as well as non-personally identifiable information on Resolutions Sites and/or Services.

### **Passive Data Collection**

We may receive passively-collected information through a variety of methods including but not limited to:

#### **Cookies**

We may use a variety of methods, including "cookies" to collect information.

#### **What is a cookie?**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. You can find more information about cookies at:

<http://www.allaboutcookies.org>

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

The cookies used on our Sites and/or Services have been categorized based on the categories found in the ICC UK Cookie guide. A list of all the cookies used on our Sites and/or Services by category is set out below.

#### **Performance Cookies**

Resolutions collects cookies on our Sites and/or Services to capture information about page visits (e.g. "performance cookies.") This information is anonymous and Resolutions uses this information only internally - to deliver the most effective content to our visitors. Information from the cookie is used to gauge page popularity, analyse traffic patterns on our Sites and/or Services and guide development of other improvements to our Sites and/or Services.

#### **Targeting, Performance, and Functionality Cookies**

In our email programs, Resolutions employs some tracking methods (e.g. "targeting, performance, and functionality cookies"). We track "opens" via a tracking pixel in the email - meaning we track who opens our e-mail messages and when you open our e-mail messages; and we track "clicks" via encoded URLs - meaning we track whether you click on the links contained in our e-mail messages. This information is used internally only to help us deliver relevant messaging, and is not shared with any third parties.

#### **Functionality and Necessary Cookies**

Resolutions does not require that you accept cookies and/or you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings, however, some functionality on our Sites (e.g. "functionality cookies"), our product or service check-out process, and Services may be disabled if you decline to accept cookies (e.g. "necessary cookies").

#### **Opting Out of Cookies**

By using the Sites and Services, you consent to the placement of the cookies referenced above. You can, however, set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You may also change your cookie settings through preference options in our Sites and/or Services, where applicable. We will indicate that upon selecting your preferences, that we will use a cookie to remember your preferences.

Resolutions never gives away information about our users. If you choose to provide Personal Information about yourself, Resolutions will use this information only to communicate directly with you. Resolutions will not sell, rent or otherwise disclose that information to third parties unless such disclosure is

necessary for the purposes set forth in this Policy, by law or a policy or notice contained or associated with a specific Site(s) and/or Service(s).

#### **Location-Based Services**

We may collect, use, and share (with Resolutions partners, service providers and licensees) precise location data, including the real-time location of your mobile or fixed location device.

#### **Analytics Tools**

We use analytics tools and other third-party technologies, such as Google Analytics and DoubleClick Cookies, to collect non-personal information in the form of various usage and user metrics when you use our online Sites and/or Services. These tools and technologies collect and analyse certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behaviour and usage information, feature-use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, and other similar information.

The third-party analytics companies who collect information on our Sites and/or Services and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

In addition to our use of technologies as described herein, we may permit certain third-party companies to help us tailor advertising that we think may be of interest to you based on your use of Resolutions Sites and/or Services and to otherwise collect and use data about your use of Resolutions Sites and/or Services. For more information about this practice, please see the "Third-Party Advertising Technologies" section below.

You may opt out of the DoubleClick cookie by visiting the Google advertising opt-out page or you may opt out of Google Analytics by visiting the Google Analytics opt-out page.

Google has additional information available about their Remarketing Privacy Guidelines, and Restrictions.

You may view a list of other third-party service providers who collect information, and/or opt-out of such collection of information about you, by visiting <http://www.networkadvertising.org/choices/> or <http://www.aboutads.info/choices/>.

## **2. How We Use Information**

Generally, we use Personal Information to establish and enhance our relationship with our users through four main categories: (1) Communication; (2) Optimization; (3) Advertising; and (4) Sharing Features. Below, we provide some specific examples of how we use the Personal Information and other information we collect.

#### **Communication and Responding to Requests**

We use your information, including Personal Information to provide you with customer support, process transactions, respond to users' requests, send newsletters and updates, send special offers and advertisements, seek your opinions and feedback, and connect users to Resolutions Sites and/or Services, and to products and services of our partners and licensees.

#### **Optimization**

We use your information, including Personal Information, behavioural metrics, and other non-personally identifiable information to operate, provide, improve, and maintain our Sites and Services, to develop

new products and services, to prevent abuse and fraud, to personalize and display advertisements and other content for you, and for other administrative and internal business purposes.

### **Advertising**

We use your information, including Personal Information, behavioural metrics, geo-location data, demographic data and marketing preferences to personalize and display advertisements and other content for you.

### **Sharing Features**

We use your information, including Personal Information and any other information you submit directly or through passive means to provide you with various ways to connect and share content (e.g., web content, text, and screen and lecture captures) with third parties. For example, we may provide you with the opportunity to email a link to certain content to another person. To use this feature, we may require you to provide certain Personal Information including your email address and the email address of each person to whom you send the link.

We also may allow you to share links to content with users of various third-party services (e.g., social networking, search and sharing services). When sharing links using one of these third-party services, if you are not already logged in to the third-party service, you will need to supply login credentials for it. If you are not a registered user of the third-party service, you will need to sign up for it. You are supplying the registration information or login credentials for the third-party service directly to that third party, and not to us. By using any of these third-party services to share links to content, you permit us to access, use and disclose any information relating to your account on each such third party service (such as your user name and profile information) that is available to us through the third party service, including through its application programming interface (API) pursuant to this Policy.

More Specifically, Resolutions Sites and/or Services may use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or share information from the Resolutions Sites and/or Services through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your site visit to your personally identifiable information resulting in the public display of the same.

### **3. When We Disclose Personal Information**

We do not share Personal Information with third parties except in the limited circumstances described in this Policy.

### **Service Providers**

We may provide Personal Information to third parties for their use in performing internal business functions (e.g., payment processing, customer service, maintenance, security, data analysis, email transmission, or data hosting) on our behalf. Additionally, some third-party service providers may collect information, including Personal Information, on our behalf. For example, we may use a third-party provider to assist us in utilizing data monitoring and scouring technologies to obtain and transmit data on users of illegal copies of some of our products (i.e. our BioField Reader and BioField Imager software product). This data collection is not performed on users of legally licensed products from Resolutions and its authorized distributors. If you are using an illegal copy of our software and do not consent to the collection and transmission of such data (including to the United States), cease using the illegal version and contact us or one of our authorized distributors to obtain a legally licensed copy of the product.

Whenever possible, we require such third-parties to only collect and use Personal Information in accordance with this Policy, to maintain the confidentiality, security, and integrity of such Personal Information, and for no purpose other than providing us with our requested services.

### **Legal Requirements**

We may disclose Personal Information if we have a good-faith belief that doing so is required by a subpoena, warrant, or other judicial or administrative order or otherwise required by national security, law enforcement requirements, statute, government regulation, or law. Additionally, we may disclose Personal Information where we, in good faith, deem it appropriate or necessary to prevent violation of our Terms of Use or End-User License Agreements, or our other agreements; take precautions against liability; protect our rights, property, or safety, or those of a partner, any individual or the general public; maintain and protect the security and integrity of our Sites and/or Services or infrastructure; protect ourselves and our Sites and/or Services from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third party claims or allegations; or assist government regulatory agencies.

### **Change of Ownership**

Information about our users, including Personal Information, may be disclosed as part of any bankruptcy, merger, sale, transfer of company assets, acquisition, or similar transaction. In the event of such a transaction in which your Personal Information would be transferred to a third party, we will make reasonable efforts to notify you. For example, we will post a notice of the transfer of Personal Information on our Sites and/or Services and, if we have your email address, we will send notice of the transfer of Personal Information to that email address.

### **Interactive Features**

If you use a forum, blog, channel, bulletin board, chat room, user-commenting features, or other interactive sharing or social features that may be offered through any of our Sites and/or Services, you should be aware that any Personal Information you submit, display, or publish there is considered publicly available and can be read, collected, used, and disclosed by other users of those features, by us, and other third parties without restriction, except to the extent limited access features are available, if any. To request removal of your personal information from our blog, sharing service or community forum, for example, contact us at the information provided in this Policy. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

### **4. Third Party Advertising Technologies**

In addition to using cookies and related technologies as described above, we also may permit certain third-party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on our Sites and/or Services (e.g., to allow them to tailor ads on third party services). These companies may deliver ads that might also place cookies and otherwise track user behaviour. These companies may use information about user behaviour in order to provide customized advertisements across various services and products. In the course of providing these services, products or placing advertisements, these third-party companies may place or recognize a unique cookie on your computer, and may record information to these cookies based upon your activities on any of our Sites and/or Services and on third party websites. Each of these companies uses this cookie information according to their own privacy and security policies. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out as indicated in this Policy. Please note this does not opt you out of being delivered advertising. You will continue to receive generic ads.

### **5. Children Under 13**

We do not knowingly seek or collect Personal Information from users under the age of 13, except to the extent that Resolutions may collect limited personal information from students (but not their email addresses), but only where that student's school or school district, has contracted with Resolutions to collect the personal information from students for the educational context authorized by the school or school district. Children under 13 years old are not allowed to create an account without a parent's or

guardian's express consent. We recommend that minors over the age of 13 ask their parents for permission before sending any information about themselves to anyone over the Internet.

We require schools or school districts to obtain parental or guardian consent from a student's parent or guardian before collecting any such student Personal Information. If you are a student, please do not send any Personal Information about yourself to us, other than what we request from you when you sign up for any of our Sites and/or Services. In the event that we learn that we have collected personal information from a student without parental or guardian consent being obtained by his or her school or school district, or if we learn a student has provided us Personal Information beyond what we request when he or she signs up for any of our Sites and/or Services, we will delete that information as quickly as possible. If you believe that a student may have provided us Personal Information beyond what is requested when signing up for any of our Sites and/or Services, or that a student's school or school district has not obtained parental or guardian consent, please contact us at [enquiries@resolutions.org.uk](mailto:enquiries@resolutions.org.uk)

Notwithstanding anything to the contrary contained in this Policy, if you are a student as described above, and your parent or guardian signed up for our Sites and/or Service with a password or access ID provided by your school, you understand that your parent or guardian may be able to view all information within or associated with your account, including, without limitation, messages between you and your teacher and grades you received on your assignment.

Users under 13 years of age who are not students as described above, your continued use of the Site and/or Service will be considered by [enquiries@resolutions.org.uk](http://enquiries@resolutions.org.uk) as confirmation that your parent or guardian has expressly consented to the handling of your Personal Information as described in this Policy as further indicated in the opening paragraph of this Policy.

## **6. Your Choices**

### **Submitting Personal Information**

If you do not want to submit Personal Information that is necessary to provide or use our Sites and/or Services or to fulfil your request, you will not be able to access and/or participate in certain Resolutions Sites and/or Services. For example, you will not be able to register for an account with us or participate in certain contests or promotions, or access and/or use certain Resolutions product features or online services. In addition, your refusal to submit Personal Information may limit our ability to respond to your customer support inquiry in a timely fashion.

### **Editing Personal Information**

You may, at any time, update, correct, or delete certain Personal Information that you have provided to us by contacting us at the mailing or email address set forth in this Policy.

### **Marketing Choices**

If you want to remove yourself from individual communications, including marketing promotions, advertisements, updates and email newsletters, simply click the unsubscribe link in the communication. You also acknowledge and agree that there may be instances where we may elect to notify you about changes to our terms, conditions, and policies. Because this information is important to your interaction with us, you may not opt out of receiving these communications.

### **Account Deletion**

If you submit Personal Information, you may delete your account with us at any time. If you delete your account, your Personal Information and any and all other account related information including, but not limited to, user profile data, sharing data and any other data, credits specifically associated with your account are also permanently deleted. If you choose to have an account with us in the future, you will

have to sign up for a new account as none of the information you previously provided or saved within your account will have been saved.

## **7. Security**

We take reasonable measures, including the implementation and maintenance of physical, electronic, and managerial procedures, in an effort to assure the security, integrity, and accuracy of all Personal Information that we collect. Our efforts include procedures designed to avoid unauthorized access, alteration, loss, misuse, disclosure, or destruction of Personal Information taking into account the risks involved in the processing and the nature of the Personal Information.

If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Resolutions Sites and/or Services covered by this Policy and providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your account information and usage.

## **8. Data Integrity and Purpose Limitation**

We collect and use Personal Information in accordance with this Policy and only for the limited relevant purposes stated in this Policy and/or at the time we request such Personal Information from our users, or for such purposes to which a user may otherwise consent. We do not use or share our users' Personal Information in a way that is incompatible with the purposes for which such Personal Information was requested and authorized for use by us. We retain Personal Information for no longer than is commercially useful to carry out our business purposes, or as we believe may be legally required. Resolutions takes reasonable steps to ensure that the Personal Information is reliable for its intended use, accurate, complete and current.

## **9. Access to Personal Information**

You may view, correct, amend, or delete the Personal Information Resolutions stores about you where it is inaccurate or if you believe the Personal Information has been processed contrary to the terms of this Policy except to the extent where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question or where the rights of persons other than yours would be violated. If you wish to obtain a report of the Personal Information Resolutions has about you, please send us a written request at the address set forth in this Policy.

## **10. Third Party Login Functionality**

We may permit users with accounts on certain third-party services, including but not limited to, social networking, search, sharing, and other services delivered by third-parties, to bypass the standard applicable registration process. If you connect through an authorized third-party service, you will be able to use your third-party login information to access Resolutions content, Sites and/or Services. We are not responsible for the sharing, posting, commenting, or other content and information gathering practices of any third-party services that may be triggered by using these third-party login services. Please review their terms of service and privacy policies carefully before using third-party login functionality to access any Resolutions Sites and/or Services.

By using any third-party services to log in to access Resolutions Sites and/or Services, you permit us to access, store and use all information related to your third-party account that may be accessible to us through the third-party service, including through its application programming interface (API), pursuant to this Policy.

## **11. Third-Party Services and Links**

Resolutions content, including forums contests, products, services, newsletters and communications that we send to our users, may contain links to content provided by third-parties. For example, our communications may contain links to third-party merchants from whom you may purchase products. To

purchase products from these third-party merchants, you may be required to provide Personal Information, including your credit card or other payment information.

Some of Resolutions products and services (e.g. Resolutions BioField Reader, BioField Imager and BioField Imager Pro, and earlier versions of the same), interface or integrate with third party storing, sharing, and may access sites and services. If you choose to store, share, or access files, content or information which may include personally identifiable information (collectively "content") you create using Resolutions products and services through these services, you should review the privacy policy of that service. For example, if you desire to store, share or access your content created with Resolutions software, you should review Resolutions Privacy Policy, and you should also review the privacy Policies of other sites and services as your content will be collected, processed and/or stored by Resolutions and/or the third-party provider.

### **Third Party Services and Links**

Some of Resolutions products and services may interface or integrate with third party storing, or sharing, and access sites and services. If you choose to store, share, or access files, content or information which may include personally identifiable information (collectively "content") you create using Resolutions products and services through these services, you should review Resolutions Privacy Policy and you should also review the privacy policy of that service as your content will be collected, processed and/or stored by Resolutions and/or the third-party provider.

### **Where We Store and Process Personal Data**

Personal information collected on Resolutions' sites, services, and products may be stored and processed through Resolutions' servers located in the United States or any other country.

Resolutions can be reached at the following address:

Meadowcroft,  
Scoulton,  
Norwich,  
Norfolk  
NR9 4AQ  
United Kingdom

### **Notice for Minors**

Resolutions offers interactive Sites and/or Services which allow you to post content to share publicly or with friends. If you have questions about how to remove content in a specific Site and/or Service or if you would like additional assistance with deletion, you can contact our Resolutions Support team directly at [enquiries@resolutions.org.uk](mailto:enquiries@resolutions.org.uk). Although we offer deletion capability for our Sites and/or Services, you should be aware that the removal of content may not ensure complete or comprehensive removal of that content or information posted through the Sites and/or Services.

### **13. Changes and Updates to This Policy**

We may update this Policy from time to time. If we do, we will update the "effective date" at the top of the Policy. If we make material changes to how we use Personal Information, we will attempt to notify you of the change and to give you the opportunity to exercise choice as to how your Personal Information is used. We will post the updated Policy on the affected Sites and/or Service, and if we have your email address, we will send notice of the update to that email address.

We encourage you to review this Policy periodically to stay informed about our collection, use and disclosure of Personal Information. Your continued use of our Sites and/or Services or any other content,

products or other services covered by this Policy constitutes your agreement to this Policy and any updates.

#### **14. International Users and Self-Regulatory Frameworks**

Resolutions' Sites and/or Services may be hosted in the United States. If you utilize our Sites and/or Services from the European Union or Switzerland, or any other region with laws governing data collection and use that may differ from U.S. law, please note that you may be transferring your personal data outside of those jurisdictions to the United States. The United States does not have the same data protection laws as the European Union, Switzerland and other regions. By providing Personal Information under this Policy, you consent to the use of your Personal Information in accordance with this Policy and the transfer of your Personal Information to the United States.

The Personal Information practices set out in this Privacy Policy apply to all Resolutions Sites and/or Services, and customers worldwide. You have a right of access and to correct such data and/or Personal Information. To exercise these rights, or for other data privacy questions, please contact/send an email to [enquiries@resolutions.org.uk](mailto:enquiries@resolutions.org.uk)

#### **15. Enforcement**

Resolutions regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Policy or Resolutions' treatment of Personal Information by contacting us by email: [enquiries@resolutions.org.uk](mailto:enquiries@resolutions.org.uk) or by writing to us at Resolutions, Meadowcroft, Scoulton, Norwich, Norfolk NR9 4AQ United Kingdom. When Resolutions receives a formal written complaint at this address, it is Resolutions' policy to contact the complaining party regarding his or her concerns within 45 days of receiving the complaint. Resolutions will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved by Resolutions and an individual, at no cost to you.

If you do not receive a timely response to your complaint, and/or if Resolutions has not satisfactorily addressed your complaint, you may contact a local data protection authority via the instructions below. You may contact the EU DPA panel at [ec-dppanel-secr@ec.europa.eu](mailto:ec-dppanel-secr@ec.europa.eu), or access contact information for a particular country at [http://ec.europa.eu/justice/data-protection/bodies/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/index_en.htm). You may find contact information for the Swiss FDPIC at <http://www.edoeb.admin.ch/kontakt/index.html?lang=en>.

If you do not believe that your complaint has been satisfactorily addressed by Resolutions or the applicable local data protection authority, under certain conditions, you may be able to invoke binding arbitration.

Resolutions is also subject to the investigatory and enforcement powers of the FTC and Resolutions shall remain responsible for its compliance with the applicable self-regulatory framework if its third-party agents process personal information in a manner inconsistent with the applicable Principles, unless Resolutions can prove that it is not responsible for the event giving rise to the alleged claim.

#### **16. No Error Free Performance**

Resolutions does not guarantee error-free performance under this Privacy Policy. Resolutions will use reasonable efforts to comply with this Privacy Policy and will take prompt corrective action when Resolutions learns of any failure to comply with our Privacy Policy. Resolutions shall not be liable for any incidental, consequential or punitive damages relating to this Privacy Policy.