

## etouches, Inc. Privacy Policy

**Effective Date: March 1, 2017**

This privacy policy applies to etouches, Inc. (“etouches”) and covers the site, [www.etouches.com](http://www.etouches.com) corporate site and application(s) accessed via these domains: [eiseverywhere.com](http://eiseverywhere.com), [eventscLOUD.com](http://eventscLOUD.com). Because we want to demonstrate our commitment to our users’ privacy, we disclose the following information.

1. What personal information etouches collects.
2. What personal information third parties collect through the Web site.
3. What organization collects the information.
4. How etouches uses the information.
5. With whom etouches 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 etouches control.
8. How users can correct any inaccuracies in the information.

etouches, Inc. has been awarded TRUSTe's Privacy Seal signifying that this privacy policy and practices have been reviewed by TRUSTe for compliance with [TRUSTe’s Program Requirements](#) and the [TRUSTed Cloud Program Requirements](#) including transparency, accountability and choice regarding the collection and use of your personal information. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy Trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy policy or practices, please contact us at [support@etouches.com](mailto:support@etouches.com). If you are not satisfied with our response you can contact [TRUSTe](#).

The TRUSTe program covers our collection, use and disclosure of information we collect through our corporate website, [www.etouches.com](http://www.etouches.com) and our application(s) accessed via these domains: [eiseverywhere.com](http://eiseverywhere.com), [eventscLOUD.com](http://eventscLOUD.com). The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged etouches, Inc.

### EU-U.S. Privacy Shield Framework

etouches is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). etouches, Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. etouches, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, etouches, Inc. commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Private Shield policy should first contact etouches, Inc. at:

etouches  
13 Marshall Street  
Norwalk, CONNECTICUT 06854 USA

E-mail: [support@etouches.com](mailto:support@etouches.com) Phone: 1-877-386-8248

etouches, Inc. has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information or to file a complaint. The services of EU DPAs are provided at no cost to you.

## Information Collection and Use

etouches is the sole owner of the information collected on our corporate web site, [www.etouches.com](http://www.etouches.com). etouches collects information at several different points on our Web site. Information collected through our corporate site, such as name, address, and phone number, is only collected for purposes of engaging in a sales dialog per a prospect's request. Information collected via the etouches application is collected on behalf of our customers for event registration or for users of the etouches administrative application.

Certain modules of the etouches application allow the communication between direct users, however no end user details are shared unless explicitly requested to be so by both parties. Users have the option to participate in this activity for the purpose of contacting by email or regular mail. A user must provide the transaction information (account transactions), user's login information, user's identity certificate, user's employer, organization department user is employed, user's job title, user's home contact information, user's business contact information, business/organization name, department/division of business/organization and business/organization identity certificate. It is optional for the user to provide User's Identity Certificate, User's Employer, Organization Department User is Employed, User's Job Title, User's Home Contact Information, User's Business Contact Information, Business/Organization Name, Department/Division of Business/Organization and Business/Organization Identity Certificate.

We encourage users to provide optional information so we can provide a more personalized experience on our site. The reason we use this information is to complete the current transaction, contact by email or regular mail and understand your interests.

## Tracking Technologies

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

Tracking Technologies:

Technologies such as: Cookies, beacons, tags and scripts are used by etouches, Inc. and our integration partners, affiliates, or analytics or service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our userbase 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 our web application, to remember users' settings (e.g. language preference), and 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.

#### Advertising:

We partner with a third party to either display advertising on our Web site or to 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 (or if located in the European Union click here) Please note this does not opt you out of being served ads. You will continue to receive generic ads.

#### Local Storage:

Third parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use LSOs such as HTML 5 to collect and store information.

Various browsers may offer their own management tools for removing HTML5 LSOs.

## Profiles

etouches uses Website data to create a profile of our users. A profile is stored information that we keep on individual users that details their viewing preferences. Consequently, collected information is tied to the users personal information to provide offers and improve the content of the site for the user. This profile is used to tailor a user's visit to our Web site, and to direct pertinent marketing promotions to them.

## Communications from the Site

When customers provide us contact information for Website (user participation is voluntary) we use the information to contact the user to deliver sales and product information that will be useful to them.

You may choose to stop receiving our newsletter or marketing/product emails by following the unsubscribe instructions included in these emails or you can contact us at [support@etouches.com](mailto:support@etouches.com).

## Sharing Information

We may provide your personal information to companies that provide services to help us with our business activities such as payment processing or offering customer support. These companies are authorized to use your personal information *only as necessary to provide* these services to us.

We will share your personal information with third parties only in the ways that are described in this privacy policy. In cases of onward transfer to these third parties for data of EU individuals received pursuant to the EU-US Privacy Shield, etouches is potentially liable should any issues or concerns arise.

We may also disclose your personal information

- as required by law, such as to comply with a subpoena, 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,
- if etouches is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information,
- to any other third party with your prior consent to do so

### **Personal Information**

Personal information is not shared with any third parties.

### **Aggregate Information (non-personally identifiable)**

Information collected for Website is not shared with any third parties.

## **Information Related to Data Collected through the etouches Application**

etouches collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes. etouches works with its Clients to help them provide notice to their customers concerning, the purpose for which personal information is collected.

We collect information for our clients, 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 provisions in this Policy regarding notice and choice and the service agreements with our Clients.

We have no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to the etouches's Client (the data controller). If the Client requests us to remove the data, we will respond to their request within 30 business days.

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

### **Tell-A-Friend**

If you choose to use our referral service to tell a friend about our site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the site.

etouches stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program.

Your friend may contact us at [support@etouches.com](mailto:support@etouches.com) to request that we remove this information from our database.

## Blog

Our Web site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. *To request removal of your personal information from our blog or community forum, contact us at [support@etouches.com](mailto:support@etouches.com).* 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.

## Social Media Features & Widgets

Our Web site 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 site. These Features may collect your IP address, which page you are visiting on our site, 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 Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

## Links to Other Websites

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

## Data Security

etouches has physical security in our facilities to protect against the loss, misuse, or alteration of information. Our company uses secure encryption technology for all sensitive financial or health data transmitted on our site.

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Web site, you can contact us at [support@etouches.com](mailto:support@etouches.com).

## Correcting, Updating, Deleting, Deactivating Personal Information

If a user's personal information changes such as zip code, phone, email or postal address, they can change online, physical contact, and other information by logging into their account or by contacting us with any of the information in the Contact section. If a user wishes to correct/update/delete information or no longer desires our service, they can notify us of what they desire by contacting us using any of the information in the Contact section of this policy. We will respond to your request to access within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Changes to the Privacy Policy**

The information you submit to us is controlled by the privacy policy in effect at the time you submit it. If we significantly change our policy, we will post a notice in a conspicuous place on our website notifying visitors of policy changes. If we make any material changes, we will also post a notice on our website prior to the change becoming effective.

## **Contact Information**

Using the following information, you can contact us if you have questions about our privacy policy.

Etouches  
13 Marshall Street  
Norwalk, CONNECTICUT 06854 USA

[E-mail: support@etouches.com](mailto:support@etouches.com) Phone: 1-877-386-8248

## **Resolving Privacy Policy Disputes**

If you think we have not followed our privacy policy in some way, it can be resolved in the following manner:

Contact etouches Customer Support using the information above.