

# PCC Americas and Brightspot Website Security and Privacy Policy

Updated: January 2, 2018

## General Statement of Privacy

PCC Americas and Brightspot (as an agent of PCC Americas) respect the privacy of Users of this Site. Subject to the provisions of applicable laws, any information you submit to us via this Site will be processed only in accordance with this Policy.

## Personally Identifiable Information

We collect personally identifiable information (PII) about Users through this Site when a User submits a request for information, downloads certain information, accesses one of our services on the Site (including our Assessment Tool), or otherwise contacts us. This information includes, but is not limited to, your name (first and last), company name, title, company address, phone number, fax number, and e-mail address. We do not sell products through this Site and we do not collect credit or debit card information through this Site.

## Use of Personally Identifiable Information

Any PII you provide on this Site is used to enable us to provide services and features offered on the Site, to respond to your inquiries or requests, to promote this Site and/or the services and features provided by the Site and to advance the business of PCC Americas and Brightspot.

Except as described below, the information collected on our Site will not be shared with third parties. We may share Users information with our select partners. These can include affiliated organizations. If you would prefer that we not share your Users information with our partners, please contact us at: [info@pccamericas.com](mailto:info@pccamericas.com) or [info@spearone.com](mailto:info@spearone.com)

We may use third parties to provide specific services, such as helping us manage and maintain the Site and providing data processing services. These third parties may have access to and use of the PII collected from you in order to perform services for us and not for any other purpose.

Certain employees will have access to your PII. As in the cases of our third party contractors and agents they may use your PII only to provide us with a specific service and not for any other purpose.

We may disclose specific information about you without providing you a choice if, based on our good faith belief, it is necessary to do so to (i) protect or defend our legal rights or property or our employees, agents and contractors (including enforcement of our agreements); (ii) protect the safety and security of this Site or Users of this Site or members of the public including acting in urgent circumstances; (iii) protect against fraud or for risk management purposes; or (iv) comply with the law or legal process.

If you have consented to receive materials (e.g., newsletters) or notifications from us, we may periodically use your email address to send you such materials. If you want to stop receiving such materials from us, you can follow the unsubscribe instructions at the bottom of each email or contact us at: [info@pccamericas.com](mailto:info@pccamericas.com) or [info@pearone.com](mailto:info@pearone.com). We do not currently obtain PII from persons other than Users, but if we were to obtain PII from a third party, our use of that information would also be governed by this Privacy Policy.

## Non-Personally Identifiable Information

In general, non-personally identifiable information (NPII) is information that is generated by the use of the Site by a person but that does not identify him or her personally. NPII includes, but is not limited to, information we automatically collect on your use and/or actions on our Site (e.g., user traffic patterns, page views on the Site, click-through rates, and search terms that Users enter into our search utility). In addition, when a Visitor arrives at our Site, we collect the IP address of your computer (or the proxy server you use to access the World Wide Web) and the type of operating system and browser software used. An IP address can tell us the User's internet service provider and, based on that, can suggest the geographic location of the connection. However, an IP address by itself does not identify a particular User. We may also know the URL of the site from which you came, the site to which you are going when you leave this Site.

## Use of Non-personally identifiable information

As a general matter, NPII helps us determine how our Site is being used, helps us identify popular areas of the Site, and helps determine the effectiveness of our promotional activities regarding the Web site. This data is used to manage and improve the Site, track usage, and for security purposes. We do not link this NPII to any PII. We may share NPII with partners and other parties.

## User-Generated Content

This Site does not currently permit the posting of any user-generated content.

## Use of "Cookies"

Our Site uses electronic files called "cookies" that hold small pieces of information to help track your usage of our Site. Our cookies do not collect any PII about you. Our cookies do not cause any other data to be read from your hard drive.

Cookies are unique to each User and enable our Site to know when you visit, so you: (1) do not have to remember your username and password each time you visit the Web site; and (2) receive any personalized services you have requested.

We use cookies to help us understand better how Users use our Site so that we can improve it. For example, the cookies allow us to collect information about how many people are visiting our Site, what pages they are visiting and how they navigate the Site. This helps us to track trends over time. You can choose to not receive a cookie file by enabling your web browser to refuse cookies or to prompt you before you accept a cookie. You can also delete cookies from your computer. However, if you these things, the full functionality of this Site may not be available to you and you may be required to enter your user name and password more frequently.

## Third Party Sites

This Site may contain links to other Internet Web sites. When you click on these links, you will be transferred out of our Site and will be connected to the websites of the organizations that you selected. Unless otherwise explicitly stated, we are not responsible for the privacy practices or the content of such Web sites or for the goods or services available on such Websites. Each of these linked websites maintains its own independent privacy and data collection policies and procedures. If you visit a website that is linked to our Site, you should consult that website's privacy policy before providing any PII.

## Transfer of Assets

If we make a sale or transfer of all or a material part of our assets or are otherwise involved in a merger or transfer of all or a material part of our operations, we may transfer your PII to the party or parties involved in the transaction as part of that transaction. Should such a transfer occur, we will use reasonable efforts to try to require that the transferee use personal information you have provided through this Site in a manner that is consistent with this Privacy Policy.

## Children

This Site is not directed at children less than 15 years of age and we do not knowingly collect personal information from such children. If we inadvertently collect PII from a person we have reason to believe might be under 15, we will promptly delete it and make no use of it.

# Security

We use administrative, technical and physical measures to help protect PII against loss, theft and unauthorized use, disclosure or modification, including firewalls and scanning software to detect and block malicious code. Internally, we employ encryption technologies, user authentication systems (e.g., passwords and personal identification numbers) and access control mechanisms to secure access to our computer systems and files. Other information you send to this Site, including email messages, will not be encrypted unless we advise you otherwise. Only authorized individuals have access to the information you provide us.

You understand and agree that "perfect" information security does not exist anywhere, including on the Internet. We do not guarantee that our safeguards will always work. Please be aware that our information security software may cause some e-mail messages sent via this Website not to be received. You should be aware that some information sent to us using this Website may not be secure in transmission.

## Users From Outside the United States

All PII collected through this Site is collected and stored in the United States. By using this Site and/or by submitting PII to this Site, you consent to having your information transferred to the United States and being processed and maintained in the United States, subject to applicable U.S. laws. U.S. laws may not provide the same level of protection as the law of your home country. If a User who is located in the European Union or Canada chooses to send us PII, the User is responsible for ensuring that the transfer of such information conforms to all local data protection laws.

## Correcting, Updating or Deleting Information

Upon request Users may review the Users account information that we maintain about them and that was obtained through this Site. We will take reasonable steps to correct any such information, including PII, that a User informs us is incorrect. Users may correct, update or delete any PII they may have previously provided to us by contacting us as indicated below.

In any case, we will maintain copies of Users information to the extent retained as part of our Site's standard backup/archive process. Such information will not be publicly available. These procedures will not remove information that has been provided by you to, or collected from you by, the Web sites of our business partners. Archived Users information will be deleted in accordance with our Site administration policies that are aimed at minimizing storage costs. We cannot provide any assurance that any Users information that has been archived and then deleted will be recoverable by any means.

To make changes to your contact information, or to opt out of receiving information, please contact us in one of the following ways:

Send an e-mail to [info@pccamericas.com](mailto:info@pccamericas.com) or [info@brightspot.email](mailto:info@brightspot.email)

Send a written request to:

Brightspot  
102 Decker Court, Suite 150  
Irving, TX 75062  
Or call us at 972-661-6000

## Changes to This Privacy Policy

From time to time we may modify this Policy and such modifications shall be effective upon posting by us on this Site. Your continued use of this Site after we post a revised Policy signifies your acceptance of the revised Policy. Please review this Policy regularly to ensure you are updated as to any changes.