

Torridon Solutions Limited Privacy and Security Policy

"We do not rent, sell or share your email address under any circumstances"

Pete McWhinnie & Mike Scott - Co-Founders Torridon Solutions Limited

Torridon Solutions Limited ("Torridon", "we") takes the privacy of our customers and the security of their Personal Information very seriously. We provide this statement of our Privacy and Security Policy ("Statement") because you have the right to know what Personal Information we collect, how it is protected and used and the circumstances under which it may be disclosed.

If you have further questions regarding this Statement, please contact us:

- by email at: privacy@torridonsolutions.com and include your name and telephone number or email or postal address so that we can contact you; or
- by letter to us at: Privacy Director, Torridon Solutions Limited, 2nd Floor, 145-147 St Johns Street, LONDON EC1V 4PY. UNITED KINGDOM; making sure to include your name and mailing address or telephone number so that we can contact you.

To Whom and to What this Statement Applies

This Statement only applies to Torridon, its subsidiaries, and to the website www.torridonsolutions.com and other websites directly operated by Torridon and its subsidiaries. This Statement does not apply to third parties. Torridon and its officers, directors, employees and sub-contractors are required to honour this Privacy and Security Policy.

The Personal Information We Collect: How It Is Gathered and Used

We only collect only the Personal Information you voluntarily provide to us or that is given to us by third parties that have your permission to share your Personal Information with us. "Personal Information" includes your name, shipping and / or mailing address, telephone number, email address, credit or debit card account number, company details and may also include your purchase history.

Personal information may be collected and used in the following ways:

- **Information Request:** When you make a request for information by email or through a website, we collect your email address and other personal information so that we can respond effectively to your query;
- **Trial Download:** When you want to download a Trial Version of one of our products, we ask you to provide your email address and some other personal details so that: a) we can send you a link to a download page; b) we can keep in contact with you to guide you through the Trial period, and c) we can follow up with you to get your feedback on our products. You may unsubscribe to the follow up emails by clicking on the unsubscribe link provided in the email messages;
- **Direct Purchase:** When you purchase from us directly (by phone or correspondence), we ask you to provide certain personal information, details about the company you work for (if relevant), and payment details which may include credit card information. Your credit card / payment details are only used for completing the purchase transaction, are not stored electronically in our systems, and are retained only as necessary for administration purposes.
 - Any payment processing using your credit card details is enacted through encrypted (SSL) web pages with our credit card processing bank / on-line payment partner;
 - Your personal information is used so that: a) we can send you your licence key, an invoice and a link to a download page; b) we can follow up with you to ensure that you are able to use the product successfully, and c) to get your feedback on our products. You can unsubscribe to any follow up emails by clicking on the unsubscribe link provided in the email messages.
- **Online Purchase:** When you purchase on-line from our website, we ask you to provide certain personal information and details about the company you work for (if relevant), with payment being handled by our on-line payment partner. Our on-line payment partner process your credit card / other payment details through encrypted (SSL) web-pages, and only advise us of the successful completion of the transaction. We do not receive your credit card information.
 - Your personal information is used so that: a) we can send you your licence key and a link to a download page; b) we can follow up with you to ensure that you are able to

use the product successfully, and c) to get your feedback on our products. You can unsubscribe to any follow up emails by clicking on the unsubscribe link provided in the email messages.

- **Email Newsletters:** subscription to a Torridon Newsletter is voluntary. On download of a Trial Version or on purchase of one of our products, the option to receive our periodic email newsletter is not checked. If you want to opt-in to receive the Newsletters please check the "Yes" box when registering or purchasing. You can unsubscribe from the Newsletters at any time by clicking on the unsubscribe link provided in the email messages.
- **Surveys:** occasionally, we may conduct voluntary surveys through the website or directly through emails. These surveys may ask customers and potential customers for background information and information about their preferences. You may at any time opt out of a survey by accessing the unsubscribe or "no thank you" link provided in the email message or survey. The information collected from surveys is aggregated and helps us to improve our understanding of customer needs and improve customer satisfaction. We do not sell any of the information gathered in these surveys.
- **Forums:** Membership of our forums is voluntary. When you provide your username, password and email address you can access on-line support and receive input from other users and Torridon support personnel.

How We Use Your Personal Information

Other than the uses described above, we may use your Personal Information to help us market our products and services. For example, we may:

- Undertake analyses improve the effectiveness of our marketing. For example, we may analyse our sales by geography, sector, or company size.
- Send you email newsletters and specials offers.

The Personal Information We Share and Who We Share It With

Torridon does not rent, sell or share its email address lists under any circumstances. We may share segments of your Personal Information with our on-line payment partner as necessary to complete a transaction that you specifically request. Other than this, we do not share your personal information with anyone.

Personal Information We Do Not Share

Torridon does not rent, sell or share its email address lists, or lists of other Personal Information we may possess. We do not share your name, email address, telephone number or credit card information with other companies, except our on-line payment partner as necessary to complete a transaction that you specifically request.

How You Can Control the Use of Your Personal Information and Control Email Communications You Receive From Us

We give you choices and control over the collection and use of your Personal Information at the time you are providing it and on an ongoing basis. You have the opportunity to choose to receive email communications such as our newsletter and / or special offers and change your mind at any time. If you choose not to sign up for these email services, we will send you only email that relates to a specific purchase or in response to an email inquiry from you. You can update your Personal Information or ask to have your email address removed from our newsletter list by emailing privacy@torridonsolutions.com

E-Mail Abuse

There are known methods that spammers can use to hide their identity by using other people's email address to send out emails. If you have any question about the genuineness of an email you receive that appears to be from Torridon, contact us at privacy@torridonsolutions.com and do not furnish personal information in response to the email

Other Types of Information We Gather, How it is Used and Our Use of Cookies and GIFs

We use technology to collect anonymous, non-Personal Information that indicates how our site is used by visitors. We use this information to improve our site, for example by enhancing pages or features that are visited frequently, and on occasion we may share this information with third party companies to provide them with an indication of the amount of interest in our site for advertising purposes and to

help us plan for technical improvements. This information will not identify you or any other user of our web site as an individual. We use clear gifs in our HTML-based emails to let us know which emails the recipients have opened. We use cookies to understand how our site visitors link to our site and what pages they view during their visit. Cookies also allow us to personalize your shopping experience and speed the check-out process.

How We Protect Personal Information

Torridon has implemented a variety of encryption and security technologies and procedures to protect information stored in our computer systems from unauthorized access. We also maintain procedural safeguards that restrict access to your Personal Information to employees (or people working on our behalf and under confidentiality agreements) who need to know your Personal Information in order to provide the products and services that you request.

Links to Other Sites

We may provide links to other sites we think you may find useful or enjoy. These sites operate independently of Torridon and will have established their own privacy and security policies. We encourage you to review these policies before submitting any Personal Information through these sites.

Consent to Transfer

The website www.torridonsolutions.com is operated in the United Kingdom, but company information is shared between UK and overseas offices and subsidiaries. Please be aware that any information you provide to us may be transferred to the United States. By using this web site and / or providing us with your Personal Information through this web site, you consent to this transfer.

Accessing your Information

Customers may access their contact information in order to correct discrepancies and update records with new address information by email or letter. (See the contact information at the beginning of this Statement).

Updates to this Statement

We will update this Statement from time to time to reflect changes in our business. If we change how we use your Personal Information or the purposes or entities for and to which we disclose your Personal Information we will post the policy change notification on our web site.

Our current Statement was last updated February 8th, 2008.