



Effective June 1, 2017; updated January 2, 2019

This Privacy Policy (“Policy”) applies to Ethics Suite, LLC, and its subsidiaries, Restaurant Ethics, LLC, Bar Ethics, LLC, Hotel Ethics, LLC (collectively, “Ethics Suite”), and the Ethics Suite websites, services and products that collect data and display these terms. It does not apply to any Ethics Suite, LLC global site, service or product that does not display or link to this statement or that contains its own privacy statement.

Ethics Suite is committed to protecting your privacy in a variety of ways including using industry accepted security measures to protect against loss, misuse and alteration of data contained in our systems. This Policy is designed to describe how we secure and maintain our customers’ and visitors’ personal information when collected on sites which link to this Policy. This includes EthicsSuite.com, RestaurantEthics.com, BarEthics.com, HotelEthics.com, and CT.EthicsSuite.com. Any information given to us will never be sold, rented, traded, shared or leased other than as outlined in this Policy.

Reports may be submitted by employees, board members, or others that a subscriber provides with access or by any person regarding a non-subscriber’s organization (“Reporter”). A “Subscriber” is any organization or location that has entered into a subscription agreement to receive reports, utilize the Ethics Suite Complaint Tracker, and other contracted services with Ethics Suite. A “Non-Subscriber” is any organization or location that does not presently have a contractual relationship with Ethics Suite (“Reporter,” “Subscriber,” and “Non-Subscriber” may also be referred to as “You”).

Ethics Suite does not publish text, images, or multimedia content that portray nudity, foul language, or violence, or other information not suitable for children. Web sites maintained by Ethics Suite are not directed to children under the age of 13. Ethics Suite will not knowingly collect or maintain personally identifiable information from or about anyone under 13. Ethics Suite is committed to complying with privacy laws to which it is subject and adhering to the highest industry standards for privacy.

Ethics Suite is not responsible for the content of information saved to any Ethics Suite system by Reporters, Subscribers, or Non-Subscribers.

Collection and Use of Information

Ethics Suite collects different kinds of information in order to provide you with the best products and services, and to operate effectively. Some of this information is provided directly by you, the Reporter, while other information may be provided by a Subscriber in connection with use of our products and services. We may also gather information by observing how you interact with our website, products and services.



What Information We Collect:

- **Registration:** When you, or your organization, sign up to use our sites or services, or you sign up to attend a webinar or to get additional information about our products and services, we may receive certain necessary information such as your name and job title and contact information such as email address, phone number, and address.
- **Account/Report Access:** To access some of our products and services you may be required to provide us specific information (such as your login credentials) that allows us to verify your authorization before accessing certain data we host. If you have chosen to remain anonymous, your anonymity will be preserved. This identity verification information is kept secure on our private servers and is only used to assist you in accessing your account or report; this information is not released outside of the relevant Ethics Suite system unless specifically authorized.
- **Reporters:** No personally identifying information is automatically collected from you as a Reporter using Ethics Suite applications. Personally identifying information, such as name and e-mail address, is stored only when you voluntarily give this information.

How We Collect Information:

Ethics Suite gathers information about how you use our sites and services in a number of ways, including:

- Web forms, such as when you type information into a registration form;
- Web logging, which enables us to collect the standard information your browser sends to every web site you visit, such as your browser type, language, and the site you came from, as well as pages you visit and links you click on within our site.

How We Use Personal Information:

Ethics Suite uses the information we collect to operate and improve our products and services and to respond to requests about promotions or products and services offered.

Visitors:

When Ethics Suite collects personally identifiable information from visitors to our sites, the information collected from opt-in users is used only to respond to visitors' requests. In instances where opt-in participants' requests relate to Ethics Suite partners, we will provide personally identifiable information only to respond to that request. Ethics Suite does not sell, rent, lease, trade or share visitors' personally identifiable information other than as outlined in this Policy. When you provide us with your personally identifiable information or otherwise choose to sign up to receive email communications from us, we will use that information to



send those communications to you. Individuals may “opt-in” and “opt-out” of receiving e-mail communications through selections available on e-mails received. For participants of our web seminars, the only personally identifiable information we share is web seminar registration information, and it is only shared with our web seminar presenters to provide this service. They are not permitted to use this information for their own marketing purposes.

Subscribers of Products and Services:

To become a Subscriber of Ethics Suite, the prospective user will be required to provide, for authorization purposes, some personally identifiable information such as name, contact information, username and password; which information is stored in our database for access to and use of certain website features. This information is kept secure on our private servers and is only used to assist you in accessing your account. No information is released outside of the Ethics Suite system unless specifically authorized.

Reporters:

No personally identifiable information is automatically collected from Reporters submitting an allegation. Personally identifying information, such as name and e-mail address, is collected and stored only when a Reporter voluntarily gives this information.

Use of Log File Technology

Server Log File Technology is used by us and our tracking utility partners. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and gathering demographic information about our user base 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.

Ethics Suite uses session ID Cookies for access to products and services by our users. These session Cookies are used to make it easier to navigate our site, products and services. A session ID Cookie expires when your browser is closed. “Cookies” are small computer files that we transfer to your computer's hard drive that allow us to know how often someone visits our Web site, and the activities they conduct while on our Web site.

As is true of most Web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link automatically-collected data through the use of Cookies and log files to personally identifiable information.



Secure Communications

Ethics Suite will take reasonable precautions to protect personal information in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

For all users, communications between the Ethics Suite site and a user's web browser are accomplished using, at a minimum, 128 bit SSL encryption and various third party security certificates to protect confidential data. Ethics Suite does not allow users to transfer or receive confidential information unless they are using a validated 128 bit (or greater) encrypted session.

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

If you have any questions about security on our Web site, you can e-mail us at support@EthicsSuite.com with "Questions about Web site Security" in the subject line. We do not link this automatically-collected data to personally identifiable information.

Automatic Information Storage

Session Variables are similar to Cookies except that they remain on our servers and are not transferred to your computer. Session Variables may be used temporarily in our system cache to create ease-of-use during your transaction. Session Variables may be used to collect nonidentifying information such as automatically-produced alphanumeric numbers held during your session on our Web site to facilitate page-to-page transactions. Session Variables also may store name, e-mail, phone, address, company name or any other identifying information for users. Session Variables do not store identifying information for other users unless otherwise stated in this policy.

Use of Third Party Services

Ethics Suite contracts with select third parties for Web-based services that include e-mail delivery and content streaming, and for services that may collect non-personally identifiable visitor data such as IP address and pages visited. These third parties may only use personally identifiable information, for example, e-mail addresses, for the service requested and not for their own marketing purposes.

Ethics Suite also contracts with select third parties in connection with the delivery of services to our clients. These third parties may not use any personally identifiable information other than to provide the specific contracted services.



Public Forums

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@EthicsSuite.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.

If you choose to comment on our blog, you will be required to login to our third party vendor's site to do so. Any information you choose to submit within this section of the site will be collected and used by our vendor and is subject to their privacy policy. Please contact them directly should you have any questions or concerns regarding your posting.

Links to Other Sites

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

Social Media Features and 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 Web 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 Web site. Your interactions with these features are governed by the privacy policy of the company providing it.

Terms

No company other than Ethics Suite is allowed to access information stored on our servers, unless expressly authorized by Ethics Suite. Unauthorized access to this information is a violation of the law. Ethics Suite has placed security measures and firewalls on all network servers in an attempt to prevent outside parties from accessing private information. In the event of a breach of security, Ethics Suite will press charges to the fullest extent possible against those parties illegally accessing information on our servers.



Access to Personal Information

Upon request, Ethics Suite will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To make a request please contact us at privacy@EthicsSuite.com with “Personal Information Request” in the subject line, and provide us with full details in relation to your request, including your contact information, your company’s name and any other detail you feel is relevant.

Upon request by mail or e-mail (to the addresses noted below in the Contact Information section), Ethics Suite will grant individuals reasonable access to personal information that it holds about them, unless otherwise legally unable to do so. In addition, Ethics Suite will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. Ethics Suite shall provide a response to an access request within 30 days of receiving such request.

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

Disclosure Pursuant to Judicial or Government Subpoenas, Warrants, or Orders

In certain situations, Ethics Suite may be required to disclose personal data in response to lawful requests by public authorities, or to requirements of national security or law enforcement requirements.

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on us.

Business Transfer

In the event Ethics Suite goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personally identifiable information will likely be among the assets transferred. You will be notified via prominent notice on our Web site for 30 days of any such change in ownership or control of your personal information.

Breach of Privacy Policy

If you have received unwanted, unsolicited e-mail sent by Ethics Suite or from any Ethics Suite system or purporting to be sent via Ethics Suite, please forward a copy of that e-mail with your comments to info@EthicsSuite.com for review.



If you have questions or complaints regarding our privacy policy or practices, please contact us at privacy@EthicsSuite.com with “Privacy Inquiry” in the subject line and provide detail on your question or complaint so that we may adequately respond.

Contact Information

Questions or comments regarding this Policy should be submitted to Ethics Suite by mail or email as follows:

Ethics Suite, LLC
Attention: Privacy Officer
28150 Alma School Pkwy, Suite 254
Scottsdale, AZ 85262
privacy@EthicsSuite.com

Changes To This Privacy Policy

Ethics Suite will post any updates or changes to our Policy to this privacy statement, the home page, and other places that Ethics Suite deems appropriate. Ethics Suite wants you to be aware of what information we collect, how we use such information, and under what circumstances, if any, we disclose such information. We reserve the right to modify this Policy at any time, so please review it frequently. If we make material changes to this Policy, we will notify you here, by e-mail, or by means of a notice on our home page prior to the change becoming effective.