

## Privacy Policy – November 10, 2011

### **Introduction**

We respect your privacy. We have created this privacy policy (“Privacy Policy”) to provide you information about how the private information that you supply is used and to inform you about your privacy-related choices. We refer to the ExpensAble web and mobile services collectively as “ExpensAble” or the “Service.” ExpensAble is a trademark of Insperity Expense Management, Inc. (“Insperity” or “we”), which owns and operates the Service. This Privacy Policy states our policy for our ExpensAble web and mobile sites and services; it does not apply to other services or sites owned or operated by Insperity or its affiliates. By using ExpensAble, you agree to this Privacy Policy.

This Privacy Policy discloses the information gathering and use practices for ExpensAble. This Privacy Policy applies to all information that you, or the company which has arranged for you to be a designated user, provide to ExpensAble and that ExpensAble maintains electronically. Additionally, this Privacy Policy applies to any personal information obtained from your use of ExpensAble.

### **What information does ExpensAble collect?**

ExpensAble provides services for companies that are its customers (each a “Customer”) and permits access and use of the Service by individuals that are our Customer’s designated users (each a “User”). The Service also obtains information about visitors to our web site (“Site Visitors”) who may or may not be Users.

If you are a User of the Service, ExpensAble collects personally identifiable information (“PII”) about you and your use of the Service. This PII includes information that you, or the company for which you are a User, provides with regard to your User profile, for example:

- name, phone number and address (street and e-mail)
- username and password
- job title

When we collect this kind of PII, it is because you or the company for which you are a User voluntarily submits the information to us in order to participate in the services we provide or offer.

When, as a User, you use the functionality of ExpensAble for expense-reporting-related activities, such as flights, travel, hotel, meals, gifts, and other expenses (“Transactional Data”), the Service records and processes this Transactional Data. While this information relates to you, it is considered to be the Customer’s information, because it relates to the Customer’s business and financial affairs.

We may collect PII from Site Visitors through methods such as sponsored contest, online surveys or requests for information.

We may also collect information about Users and Site Visitors by means of automated information-gathering methods that are discussed in more detail below.

We may also request and retain information about the company for which you are a User such as:

- your company's size, revenue, type, and industry codes (SIC and NAIC)
- your company name, phone number, physical address and URLs

**ExpensAble also collects the following information through automated means:**

- ***IP Address***

IP addresses are numbers that are automatically assigned to your computer, and, if associated with other individually identifiable information, could be considered personal information. We use your IP address to operate the Service, help diagnose problems with our server or systems, and to administer and improve ExpensAble. Your IP address is also used to help identify you and to gather broad demographic information (for example, your region, city, postal zip code), some of which we aggregate and then share with our strategic alliance companies, potential strategic alliance companies, and other third-party organizations (collectively, "partner organizations"). We also use your IP address to keep track of the information you have entered, viewed, or used by means of the Service.

- ***Site Access, Browser Type, Operating System, Etc.***

We may also collect the name of the Internet service that provides you access to the Internet (e.g., Comcast, Verizon, AOL, or ATT), your browser type, operating system, the date and time you access ExpensAble, and the Internet address of any web site from which you link directly to ExpensAble, as well as collecting other information in a User's log file. A User's log file tells ExpensAble where a User comes from when entering ExpensAble, which part of ExpensAble the User visits as well as where the User goes when leaving ExpensAble, and how much time the User spends on ExpensAble. We collect and use this information for operation and management of the Service and for monitoring and improving its performance.

- ***Use of Cookies***

Cookies are a standard technology used by commercial web services to store small pieces of information on your hard drive by sending a string of text to your browser. They make your use of the ExpensAble more pleasing and efficient by "personalizing" your User interface, for example, or identifying which parts of a site you have previously visited. They also enable the Service to pre-populate, or automatically fill out, forms and schedules. They enable us to tailor the information you receive and to assist partner organizations by identifying you as an ExpensAble User. Most web browsers automatically accept cookies, unless the browser has been configured not to accept them. ExpensAble does not use cookies to collect individually identifiable information or to collect non-individually identifiable information by using a cookie that is combined with a personal identifier. We may use one or more third party analytic services that allow us to obtain aggregate information regarding the use of the Service, and this kind of service

may place a cookie on your computer. If we decide to include advertisements, such as banner advertizing, advertisers or advertising networks may include their own cookies. The use of cookies by third party web sites is not covered by our Privacy Policy; we do not have access to or control over these cookies.

- ***Web beacons***

ExpensAble uses electronic images known as Web beacons (sometimes called single-pixel gifs) which are used along with cookies to compile aggregated statistics to analyze how our Service is used and may be used in some of our emails to let us know which emails and links have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns.

- ***Location-based Information***

An ExpensAble mobile access application will ask you for permission to obtain your location, which it may use to pre-populate forms and schedules. If you do not grant permission (or turn off this function), the application will not use your location data.

### **What is this information used for?**

We use this information to provide you with the services available on ExpensAble and to operate, study, improve, or enhance the Service. We also use your information in other ways which may include, but are not limited to, the following:

- ***Emails***

ExpensAble uses your PII to communicate with you in the course of your relationship with the Service. ExpensAble will send emails from time to time regarding services offered or industry related news or information.

- ***Commercial Offers***

We may also contact you to tell you about products and services provided by ExpensAble partner organizations. If you do not wish to receive e-mail communications from ExpensAble regarding these offers or other third-party products and services, you may opt out of receiving such communications by following the procedure set forth in such e-mail. E-mail communications from third parties may have their own procedures for opting out. Opting out of third party communications will not affect communications sent directly by ExpensAble that relate to the Service; you cannot opt out of these emails.

- ***Pre-populated Forms***

Some PII will be used to pre-populate forms for use on ExpensAble or used when submitting information to third parties.

- ***Targeted Online Displays (Banners)***

Based on your preferences and PII, ExpensAble may decide to include in our Service select banners or other ads which may be of interest to you or your company.

If we choose to use PII in a manner different than the purpose for which it was collected or as discussed in this Privacy Policy, then we will offer you an effective way to opt out of the use of PII for those other purposes.

### **With whom is this information shared?**

ExpensAble shares personal information only as described below:

- ***Affiliated Companies and Third-Party Contractors***  
We may share your information among related companies of ExpensAble. In addition, we may from time to time transfer our database of PII to third-party contractors who analyze such information on behalf of ExpensAble for the purpose of, among other things, targeting e-mails to Users regarding partner organization offers, or who mail marketing materials to Users regarding partner organization offers. Additionally, we may from time to time transfer certain PII such as credit card and billing information to a third-party contractor who provides payment processing services on behalf of ExpensAble. Such third-party contractors will be contractually bound to hold all such information in confidence under the terms of this Privacy Policy and, when applicable, the U.S.-European Union Safe Harbor and U.S.-Swiss Safe Harbor Privacy Principles, and not to share such information with any parties other than ExpensAble.
- ***Compliance with Law and Protection of ExpensAble and Others***  
ExpensAble will also disclose PII to third parties if compelled to do so by a judicial or other government subpoenas, warrants or orders, or, as necessary, to protect ExpensAble's rights or the rights of third parties.
- ***Partner Organizations***  
ExpensAble has entered into marketing agreements, strategic alliances and other relationships with partner organizations that may offer or provide products and services to you, sometimes under discounted or preferential terms. We may sometimes agree to give these partner organizations PII about our Users. If you initiate an inquiry with respect to a third party's product or services by clicking on the icon or link relating to such product or service on ExpensAble, we may also furnish such third party with certain PII for the purpose of, among other things, pre-populating forms or facilitating the exchange of information between you and the third party.
- ***Business Transfers***  
As ExpensAble and its affiliated companies continue to develop its businesses, it may sell various aspects of its business. If ExpensAble sells, transfers, or assigns a portion of its business it reserves the right to transfer all PII associated with that business as part of such a transaction. Also, in the event that ExpensAble or substantially all of its assets are acquired, the PII may be one of the transferred assets.

### **What access do you have to the information that you provide?**

If you are a User, you have access to much of your profile information through logging into ExpensAble and clicking Preferences under the Help menu. Here you can view, delete and

update profile information about you that we maintain, such as your name, company name, email address and phone number. If you use the Service but are not a Customer or User, you may contact ExpensAble at the address at the bottom of this Privacy Policy to request a copy of your information or to make any changes to your information.

### **Security measures**

ExpensAble makes access to your PII subject to certain reasonable security measures, including technological controls such as a "firewall", in accordance with industry standards. When the use of ExpensAble involves the Internet transmission of confidential information about you or ExpensAble, we use Secure Socket Layer (SSL) technology to allow the transmission of encrypted information from your PC to our server and back again; use of SSL is the industry standard for Internet platform security. No data transmission over the Internet or data storage can be guaranteed to be 100% secure, so while ExpensAble strives to protect your PII, we cannot ensure or warrant the security of any information that you transmit to or that is stored by ExpensAble.

### **Disclaimer of responsibility for privacy policy and content at linked sites**

ExpensAble may provide you with links to other web sites. We are not responsible for those sites and cannot control the use of information that you submit or that is gathered from your computer once you reach those sites, nor can we control the content of what is offered on those sites or on links from those sites. You should access such third-party web sites directly to determine their privacy policies.

### **Use of information from third parties**

We may use information about you provided by third parties (such as credit reporting agencies or strategic alliances) in order to offer their services and products, to improve the Service, or to evaluate a Customer's or potential Customer's eligibility for the Service.

### **This is not a children's website**

ExpensAble is a commercial service and does not knowingly solicit data from children or knowingly market to children. All Users must be of the legal age in their jurisdiction that qualifies them to make enforceable contracts.

### **Forums**

ExpensAble may choose to offer chat rooms, forums, message boards, and/or news groups to its Users. Any information that is disclosed in these areas becomes publicly available information, and you should exercise caution when deciding to disclose any personal information.

### **Data retention**

Because most, if not all, of the information that we collect from Users pertains to the User's role as a User for our Customer, we retain the right to retain that data indefinitely until and unless the Customer wishes to delete it, although we also have the right to erase it after a Customer discontinues using our services.

## **TRUSTe Certification and EU Safe Harbor Principles**

ExpensAble 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](#) including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program does not cover information that may be collected through downloadable software. 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 the email, phone number or address listed at the bottom of this Privacy Policy. If you are not satisfied with our response you can contact TRUSTe [here](#).

ExpensAble complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. ExpensAble has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view ExpensAble's certification, please visit <http://www.export.gov/safeharbor/>

If you have any complaints regarding our compliance with the EU Safe Harbor framework, you should first contact us via the email address, phone number, fax number or physical address listed at the bottom of this Privacy Policy. If contacting us does not resolve your complaint, you may raise your complaint with TRUSTe by Internet at [http://www.truste.com/consumers/watchdog\\_complaint.php](http://www.truste.com/consumers/watchdog_complaint.php), fax at 415-520-3420, or mail at Watchdog Complaints, TRUSTe, 55 Second Street, 2nd Floor, San Francisco, CA, USA 94105. If you are faxing or mailing TRUSTe to lodge a complaint, you must include the following information: our name, the alleged privacy violation, your contact information, and whether you would like the particulars of your complaint to be shared with us. For information about TRUSTe or the operation of TRUSTe's dispute resolution process, see [http://www.truste.com/consumers/watchdog\\_complaint.php](http://www.truste.com/consumers/watchdog_complaint.php) or request this information from TRUSTe at the addresses listed above. The TRUSTe dispute resolution process shall be conducted in English.

## **California Residents - Your Privacy Rights**

California Civil Code Section 1798.83 permits California residents who provide personal information in obtaining products or services for personal, family or household use to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for their direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to the address provided at the end of this Privacy Policy. Please be aware that not all information sharing is covered by Section 1798.83 requirements, and only information on covered sharing for California customers will be included in our response.

**Changes in these policies and practices**

ExpensAble reserves the right to change its Privacy Policy at any time. ExpensAble will provide notification of material changes to this Privacy Policy by posting a new privacy policy on ExpensAble.com at least thirty (30) calendar days prior to the change taking effect. Changes will not be marked so it is your responsibility to review the entire policy. You agree that it is your responsibility to monitor such updates. Your continued use of ExpensAble after such revisions have been made or your failure to object in writing to any notice of such change will constitute your full acceptance of such revised privacy policy. This Privacy Policy was last updated on November 10, 2011.

**More information**

If you have any questions about this Privacy Policy, please write to:

Insperty Expense Management, Inc.

Attn: Web Support (Privacy Policy Inquiry)

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