

Cogent Global Performance Solutions, Inc.**PRIVACY STATEMENT**

Last revised: February 21, 2017

When you or your representative or agent give us personal information of, or about, you, you consent (and/or your agent consents on your behalf) to the collection, storage, processing, sharing and other activities with respect to your information as provided for in this Privacy Statement.

When this Privacy Statement refers to “Cogent,” “we,” “us,” “our,” or similar terms, it means Cogent Global Performance Solutions, Inc. a Texas, USA, corporation, or the specific division, subsidiary, or affiliate that collects, stores, uses, and/or shares personal information under a Cogent brand.

When this Privacy Statement refers to “you” or uses similar words, it means the subject of the personal information discussed in this Privacy Statement.

Other privacy statements may also apply to specific services for which you sign up, or to Cogent apps and/or resources that you use. Those privacy statements should be read together with this one. Other third-party services or applications that are used in connection with Cogent’s services might also have their own privacy statements. Those statements have separate terms and should be read independently from this Privacy Statement.

Note that Cogent has subscribed to the US-EU Privacy Shield program and that Cogent transfers certain personal data of citizens of European Economic Area member states (and, when applicable, Switzerland) to the United States in reliance on the Privacy Shield program. You can see the Cogent Privacy Shield Privacy Statement at <http://snix-it.com/> and see Cogent’s certification at <https://www.privacyshield.gov/list>. If your personal data is covered by the Privacy Shield Privacy Statement, the Privacy Shield Privacy Statement will apply to that personal data.

What information does Cogent collect?

Cogent collects personal information like name, address, telephone number, other contact information, billing and payment information, information about business roles, information about training required and/or received, certifications, preferences for goods and services, group membership, association membership, occupation, and demographic information, as well as information about your participation in Cogent’s or its affiliates’ programs or services.

Additionally, Cogent’s customers may provide information to Cogent about their enterprises and personnel that helps those customers use Cogent’s services to improve process management.

Cogent, or its Internet service provider, may collect log-file information, such as Internet protocol (IP) addresses, browser type, Internet service provider (“ISP”), referring/exit pages, platform type, date/time stamp, and number of clicks.

If you provide personal information of a third party to Cogent (such as when you sign up a colleague to receive information from or about Cogent or when you provide information

about a person to enable the person to have credential or receive services), you represent and warrant to Cogent that you have all necessary authority to provide that information to Cogent and to grant to Cogent all rights in the information necessary for Cogent to do everything with that information that this Privacy Statement permits Cogent to do.

How does Cogent collect personal information?

Cogent collects some of the information directly from you when you provide it to Cogent, whether through Cogent's website(s) or Cogent applications, at conferences or marketing events, and when you acquire goods and/or services from Cogent or its affiliates or suppliers. Cogent collects personal information from its customers, who provide it to Cogent so that Cogent can provide process-management improvement services. Such personal information can be directly entered by customers into Cogent's systems, provided in batches for entry by Cogent, or otherwise.

Cogent collects information from other sources, as well, such as directories, membership lists, conference attendee information, people who acquire Cogent services for you or for your benefit, and third-party information providers.

How does Cogent use the information that it collects?

Cogent uses personal information in the following ways.

- To provide goods and services to you and/or to your organization;
- To analyze trends, administer websites, apps, and other resources;
- To communicate with you, and
- To provide offers by Cogent or third parties that might interest you.

If Cogent anonymizes the information (combines it with other information, redacts it, or otherwise makes it so that it no longer reasonably identifies you), Cogent can use the information for any purpose.

How does Cogent treat information of persons under the age of 18?

It is Cogent's policy to refrain from knowingly collecting or maintaining personally identifiable information relating to any person under the age of 18. If you are under the age of 18, please do not supply any personal information to Cogent. If you are under the age of 18 and have already provided personal information to Cogent, please have your parent or guardian contact Cogent immediately using the information below so that Cogent can remove such information from its files. If you are the parent or guardian of a person under the age of 18 and you have reason to believe that that person's personal information has been collected by Cogent, please contact Cogent immediately.

How does Cogent use online tracking methods?

Cogent uses cookies and other methods on its website(s) and/or other resources to provide offers that might interest you and to personalize the content that Cogent provides to you on Cogent's website(s) and/or other resources. Cogent may also serve, provide, or designate the content of ads or other presentations on third-party websites, including on third-party websites or as part of third-party services. Some cookies or similar devices exist only during a particular session, and some are persistent over multiple sessions over time.

These methods can allow you to maintain your account log-in information and other information between visits, and they allow Cogent to measure and record activity.

Cogent may use advertising service providers to serve Cogent advertisements on other websites or resources that you visit or use. In serving Cogent advertisements, these companies may use cookies and other tracking devices to collect information about your visits to other websites and resources, like browser type, IP address, which page or content was visited, and time of day. Cogent uses this information to evaluate advertising, customize user experience, and focus marketing and other communications to you and users like you.

Third parties whose websites or other resources you use might also use cookies or other tracking methods. This Privacy Statement does not apply to third parties' practices. You should obtain and read the privacy statements of those third parties to understand their practices with respect to cookies and other tracking devices.

You can set your web browser to reject cookies. Each browser is different, so you should check your browser's "Help" menu to learn how to change your cookie preferences. If you reject or block cookies, Cogent's website(s) might not function as intended.

Many web browsers have a "do not track" setting. That said, there is no widely-accepted standard (through the World Wide Web Consortium or otherwise) governing what should happen when a user selects "do not track" in his or her browser. If and when an industry consensus is reached about how to treat a "do not track" setting, Cogent will determine whether to follow that consensus approach. In the meantime, enabling "do not track" in your browser will not change what information is exchanged with your computer, or how that information is used.

You might be able to exercise choices regarding third-party cookies and/or tracking devices. You can obtain more information about those choices at <http://www.networkadvertising.org/choices/> or <http://www.aboutads.info/choices/>.

With whom, and how, does Cogent share your information?

(a) Anonymized information. If Cogent anonymizes information (i.e., combines it with other information, redacts it, or otherwise makes it so that it no longer reasonably identifies you), Cogent may share that information with anyone for any purpose.

(b) Outsourcing providers. Cogent may provide your information to outsourcing providers to process and ship orders, provide technical support, provide training, or perform other functions in support of Cogent's conduct of its business.

(c) Successors. If Cogent sells or otherwise transfers (or investigates the potential sale or other transfer of) all or a part of its business, Cogent may transfer to, or share with, the actual or potential buyer or other transferee, the personal information associated with the potentially or actually transferred business. Such transfer would be for the purpose of facilitating due diligence and/or allowing the buyer or other transferee to operate the business.

(d) General use. Cogent may share your information with others, (whether in return for compensation or otherwise) for joint marketing initiatives or to permit third parties to market goods or services to you.

(e) To comply with legal requirements. Cogent may share your information if required by law enforcement, government agencies, courts, or others where Cogent believes that its cooperation with information requests is required by law.

(f) International Transfer. Cogent may transfer your information to, and store and process your information in, jurisdictions other than the jurisdiction in which you live and/or work. Such other jurisdictions might have laws that treat your privacy differently from the jurisdiction in which you live and/or work. You consent to any such transfer, storage, and/or processing.

What about links and other information provided by others?

One or more Cogent websites or other resources might contain links to other websites or other resources that are not operated by Cogent. Cogent does not operate those websites or resources, and Cogent cannot control the information that the operators of such websites gather or what the operators of such websites do with the information. Cogent is not responsible for the activities of the operators of such other websites or resources.

How does Cogent secure and safeguard my information?

Cogent uses, and requires that its service providers use, commercially reasonable physical, technical, and other safeguards designed to prevent unauthorized access to, use of, or alteration of, your information.

Does Cogent supplement the information that I provide?

Cogent sometimes supplements the information that it receives from you with other information that Cogent receives from third-party sources, such as credit card issuers, directories, and/or information clearinghouses.

How May Cogent notify me in the case of a data breach?

For the purposes of any applicable law regarding notification of persons whose personal information was, or is reasonably believed to have been, acquired by an unauthorized person, Cogent's information security policy provides that any required notification may, where permitted by law, be made by the use of e-mail, telephone, fax, mail (including, but not limited to, a notice printed in an available area of a bill or statement) or posting a notice on a Cogent website or other electronic resource. The specific means used is up to Cogent, and Cogent will use its commercially reasonable judgment based on the circumstances. Where any notice is to be sent to a specific address or number (such as e-mail address, physical address, telephone number, etc.), Cogent will use the latest available address in its records. EXCEPT TO THE EXTENT PROHIBITED BY LAW, YOU AGREE TO THIS MEANS OF NOTIFICATION.

How can you correct your personal information?

If your personal information changes, if you have reason to believe that your personal information as Cogent maintains it is incorrect, or if you no longer desire service, you may contact Cogent using the contact information below and Cogent will accommodate all reasonable requests for such changes.

How does Cogent handle choice and opt-out?

Users who no longer wish to receive newsletters, digital notifications, or promotional materials or have their information provided to third parties may opt to not receive such communications or have information shared by contacting Cogent using the information below. Please be prepared to tell us the specific Cogent good or service with respect to which you wish to opt out. Cogent will comply with such requests as soon as is commercially practicable. Such compliance may involve batch processing and other processes that take 30 days or longer. If

you opt not to receive such communications or allow Cogent to share your information and then give your personal information to Cogent again using a site or under other circumstances that permit us to use your information, Cogent will regard your opt-out as rescinded.

Note that opting out will not have any effect on information that Cogent has shared with third parties as permitted by this Privacy Statement.

To change your preference with regard to the way your information is treated:

Privacy Office
Cogent Global Performance Solutions, Inc.
17031 Vista Bluff
San Antonio, TX 78247
Telephone: +1 855-476-4948
E-Mail: privacy@coagentgps.com

What if I opt out and then do things that opt me back in?

If, after opting out, you do certain things that invite us to use your personal information again, Cogent will regard you as having opted back in. Examples include, but aren't limited to, asking one of Cogent's personnel (verbally or otherwise) to send you information, signing up for an event, or similar communications or transactions. As always, Cogent will abide by the provisions of this privacy statement with respect to your personal information that you provide to Cogent.

How quickly does Cogent respond to requests?

Cogent will use commercially reasonable efforts to timely make any changes you request. Many such changes are accomplished using batch processing (i.e. collecting a number of similar change requests and making all such changes at once), so the changes might not be immediately effective. If you require an immediate change to your personally identifiable information and are unable to make such a change using the available site resources, please contact us.

How does Cogent handle changes to this Privacy Statement?

If Cogent decides to change this privacy policy, Cogent will post the changes on one or more websites and/or other places that Cogent reasonably believes will give you notice of the change if you're paying reasonable attention to the privacy provisions of Cogent's website(s) and/or resources.

Except as stated below, Cogent will use information in accordance with the privacy statement, or version of the privacy statement, under which the information was collected.

If Cogent decides to use information about you in a manner different from that stated in the privacy statement in effect at the time of collection, Cogent will notify you by e-mail if, and to the extent that, you have provided your e-mail address. If you reply to such an e-mail within a reasonable time and request that Cogent not use your personally identifiable information in the proposed new manner, Cogent will honor your request, but Cogent reserves the right to suspend your access to all or part of the services offered through one or more sites if you do so.

If you do not reply to such an e-mail, or Cogent receives a reply of "undeliverable" or similar message from your last known e-mail address, in either case after a reasonable time, Cogent will use the information in the proposed new manner.

Please be sure to update your e-mail and other contact information from time to time so that you don't miss any communication by Cogent of the kind contemplated by this section.

Are there exceptions to the other provisions of this Privacy Statement?

Notwithstanding anything else in this privacy statement to the contrary, Cogent may collect personally identifiable information and use such information in ways other than those described above if Cogent is required to do so by law or if Cogent deems it advisable in the course of assisting law enforcement activities or protecting Cogent's sites, resources, or property. Without limiting the foregoing, Cogent reserves the right to use and disclose any information that you provide to us if Cogent deems it advisable in the prosecution or defense of any litigation involving your use of a good or service of Cogent.

How do you contact Cogent?

If you feel that Cogent is not abiding by this privacy policy or if you have questions regarding the policy, you may contact Cogent's privacy liaison using the following information.

Privacy Office
Cogent Global Performance Solutions, Inc.
17031 Vista Bluff
San Antonio, TX 78247
Telephone: +1 855-476-4948
E-Mail: privacy@coagentgps.com

If you (a) wish to begin or end receipt of newsletters, digital notifications or promotional information (b) wish to update your user information, or (c) wish to opt in or out of any other service offered through the site, please contact Cogent using the following information. Please be sure to include your name and your email address, but do not include any information regarding your password(s), if any.

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