

Privacy Policy

Date

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*Please consult our webpage
(http://www.massygroup.com/InfoCom/Content/Issue_Tracker/Issue_Tracker_Privacy_Policy.aspx) for the most
recent version of this Privacy Policy*

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PRIVACY POLICY

This Privacy Policy describes the policies and procedures of Massy Technologies Infocom (Trinidad) Ltd. and its affiliates (“Massy Technologies”, “we”, “our” or “us”) on the collection, use and disclosure of your information, including any Personal Information (as below), on the Issue Tracker website (the “Site”), mobile app and the services, features, content or applications we offer to users of our Site (collectively with the Site, the “Services”). This Privacy Policy, which is incorporated into and subject to Massy Technologies Terms and Conditions of Service, does not apply to information our subscribers or customers may collect about individuals when using our Site, our Services, or any other functionality, product, or service offered by Massy Technologies.

We may collect and receive information about users of our Site and/or Services (“users”, “you” or “your”) from various sources, including: (i) Through your user account on the Services (your “Account”) if you register for the Site and the Services; (ii) Your use of the Services; and (iii) From third-party websites and services. When you access or use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information, including any Personal Information, as set out in this Privacy Policy.

Please read this Privacy Policy carefully. Should you have any questions about this Privacy Policy or Massy Technologies' data collection, use and disclosure practices, please contact us as set forth below.

Privacy Policy Coverage

This Site is hosted in Trinidad West Indies by Massy Technologies, a company headquartered at 155 Tragarete Road, Port of Spain, Trinidad W.I. This Privacy Policy explains our practices for gathering and disseminating information we collect when you visit our Site and associated web pages. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using this Site, you agree to this Privacy Policy.

This Privacy Policy covers the treatment of any information or set of information that identifies or that is used by or on behalf of Massy Technologies to identify an individual, which may, in certain contexts, include information such as an identifiable individual's first and last name; home address, billing address, or other physical address; email address (so we may contact you); a telephone number; tax identification number; or date of birth (collectively “Personal Information”) we gather through the Services. This Privacy Policy also covers our treatment of any Personal Information that our business partners share with us or that we share with our business partners. You can navigate the majority of the website without giving us any Personal Information about yourself. However, we may track the technical information (see “Information Collected Using Cookies” below) provided to us by your browsing the Site to improve the navigation, content and design of our Site.

This Privacy Policy does not apply to the privacy practices of third parties that we do not own or control, including but not limited to any third party websites, services, applications, online resources to which

this Site may link, frame or otherwise reference (collectively “Third-Party Services”) that you may access through the Services. We take no responsibility for the content or privacy practices of those Third-Party Services. We encourage you to carefully review the privacy policies of any Third-Party Services you access.

Collected Information

The information we gather helps us to improve and operate the Services. You may voluntarily provide additional information about yourself to enable us to provide the information or Services you are requesting. We store the information you provide about yourself to provide you with the information or Services you request. Such information, with the exception of any Personal Information, is typically stored for the lifetime of the database unless you request that it be removed. The information you provide us about yourself will be shared with our employees or contractors to the extent necessary to accommodate your request. We will obtain your consent in order for us to share your Personal Information with third parties in a manner that is not permitted under the terms of this Privacy Policy. Unless otherwise described below, we will not use Personal Information provided to us online for purposes other than those you have requested without also providing you an opportunity to agree to or otherwise limit such uses.

We may collect the following types of information from our users, some of which will be Personal Information and some of which will not be Personal Information.

User Content and Account Information:

Some features of the Services may allow you to provide content to the Services that is not Personal Information. All such content submitted by you to the Services may be retained by us indefinitely, even after you terminate your Account. We may continue to disclose such content to third parties in a manner that does not reveal Personal Information, as described in this Privacy Policy.

As part of your Account information, Massy Technologies collects and stores information, including the full name, company name, billing address, email address, IP address, landing page, and referring URL, for all users upon registration and use of the Services. You acknowledge that this information may be personal to you, and by creating an Account on the Services and providing Personal Information to us, you allow us, our affiliates, our service providers and our contractors to identify you and your use of the Services may not be anonymous.

Massy Technologies may process or store your Personal Information outside the jurisdiction in which you reside and, if it does so, your Personal Information will be governed by the privacy laws of the jurisdiction in which it is processed or stored and government and law enforcement agencies of that jurisdiction may be able to access such Personal Information without your consent. Wherever we are required to transfer your Personal Information, regardless of where this occurs, we will strive to take steps to ensure that your information is treated securely and in accordance with this Privacy Policy.

Please note that your submission of information or use of our Services will be deemed by us to signify explicit consent on your part to such transfer of information to any part of the world.

Email Communications:

In addition to any information you convey in emails to us, we may also receive a confirmation when you open an email from us. We collect and use this information to improve our customer service.

Financial Data:

We use third-party payment processing companies ("Payment Processors") who collect and store financial data, such as your payment method (valid credit card number, type, expiration date or other financial information), and their use and storage of that information is governed by the Payment Processors' applicable Terms and Conditions of Service and privacy policy.

IP Address Information and Other Information Collected Automatically:

We may automatically receive and record information from your web browser when you interact with the Services, including your IP address. An IP address is a number assigned to you by your Internet service provider so you can access the Internet. We receive IP addresses in the normal course of the operation of our Site. We may automatically collect and record information about your use of features of our Services, about the functionality of our Services, and other information related to your interactions with the Services. We use the information we automatically collect and record to analyze trends, to administer, monitor and improve the Site and Services, to track users' use of the Site and Services, and to gather broad demographic information for aggregate use. We do not use IP addresses to identify you personally or disclose them to others. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Services (e.g. what links you have clicked on).

Generally, the Services may automatically collect usage information, such as the number and frequency of visitors to the Site. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

Information Collected Using Cookies:

As with most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. To collect this information, when you visit our Site, a "cookie" may be set on your computer. Cookies contain a small amount of information that allows our web servers to recognize you whenever you visit. We store information that we collect through cookies, log files and/or clear gifs to create "settings" regarding your preferences. We do not tie your Personal Information to information in these settings.

Our cookies do not, by themselves, contain Personal Information, and we do not combine the general information collected through cookies with other Personal Information to tell us who you are. We do not link cookie data to any Personal Information collected on our Site. We use cookie information, which does not identify individual users, to analyze trends, administer the website, track users' movements and gather demographic information for aggregate use. No Personal Information is stored in cookies and we do not link collected data to Personal Information. Massy Technologies also may use cookies to enable our servers to recognize your web browser and tell us how and when you visit the Site and otherwise use the Services through the Internet.

Massy Technologies also uses Google Analytics, an analytics service provided by Google, Inc.

("Google"). Google

Analytics uses cookies to collect non-identifying information, which may be transmitted to and stored by Google on servers in the United States. Google provides some additional privacy options described at www.google.com/policies/privacy/partners/ regarding Google Analytics cookies.

Many browsers have an option for disabling cookies, which may prevent your browser from accepting new cookies or enable selective use of cookies. A user who does not accept cookies from our Site may not be able to access certain areas of the Site.

Information Related to Advertising:

To support and enhance the Services, we may serve advertisements, and also allow third-party advertisements, through the Services. These advertisements are sometimes targeted and served to particular users. Massy Technologies may partner with third parties to display advertisements targeted to visitors of the Services. To do so, Massy Technologies stores a cookie for visitors for the purpose of displaying advertising.

Aggregate Information:

We may collect statistical information about how users use the Services ("Aggregate Information"). Some of this information may be derived from Personal Information. This statistical information is not Personal Information.

Children's Privacy:

Protecting the privacy of children is especially important. For that reason, we do not collect or maintain information at our Site from those we know are under thirteen (13) years of age, and our Site is a general audience site not intended for users under the age of thirteen (13).

Security of Information

Massy Technologies is committed to protecting Personal Information. To do so we employ a variety of security technologies and measures intended to protect our information from unauthorized access, use, or disclosure. Massy Technologies has a corporate policy in place that requires all personnel not to disclose Personal Information to any third party that is not entitled to have that information. If you have any questions about the security at our Site, you can send an email to

profservices.tt@massytechnologies.com. Please note, however, that Massy Technologies cannot fully eliminate security risks associated with the collection, disclosure and storage of your information and that mistakes and security breaches may occur. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

Sharing Information

Summary of Sharing Information:

Except as described in this Privacy Policy, Massy Technologies will never intentionally share, sell, or rent individual Personal Information with anyone without your permission or unless ordered by a court of law.

Information submitted to us is only available and utilized by employees and systems responsible for providing services to our customers and to contracted service providers for the purposes of providing Services relating to our communications with you.

Massy Technologies may share your information with contracted service providers if sharing your information is necessary to provide a Service you have requested, as part of a joint sales promotion or to pass sales leads to one of our distribution partners, or to keep you up-to-date on product announcements, software updates, special offers or other information. If your information is shared with third parties, we will strive to only provide the information they need to deliver the Service. We will aim to restrict these companies from using your information for any other purpose, and you may choose not to have your information given to such a third party.

Massy Technologies employees and contracted service providers have been trained to handle such data properly and in accordance with our security protocols and strict standards of confidentiality. Although we cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data, we take diligent precautions to prevent such unfortunate occurrences.

We will not otherwise use or disclose any of your Personal Information, except as described in this Privacy Policy, including, to the extent reasonably necessary: (i) To correct technical problems and malfunctions and to technically process your information; (ii) To protect the security and integrity of our Site; (iii) To protect our rights and property and the rights and property of others; (iv) To take precautions against liability; (v) To the extent required by law or to respond to judicial process; or (vi) To the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety, or to effectuate the sale, merger, bankruptcy, or similar disposition of Massy Technologies or its assets.

Information Shared with Our Service Providers:

We employ and contract with people and other entities that perform certain tasks on our behalf (our “Service Providers”). We may need to share Personal Information with our Service Providers in order to provide products or services to you. Our Service Providers do not have any right to use Personal

Information or other information we share with them beyond what is necessary to assist us in order to provide the products or services requested by you.

Public Information Regarding Your Activity on the Services:

Some of your activity on and through the Services may be public, such as content you post publicly on the Site or otherwise through the Services. By posting such information on the Site, you agree that it may be viewed and used by other users or otherwise. Please also remember that if you choose to provide Personal Information using certain public features of the Services, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information.

IP Address Information:

While we may collect and store IP address information, we do not make that information public. We may at times, however, share this information with our partners and service providers, and as otherwise specified in this Privacy Policy.

Email Communications with Us:

Massy Technologies may send occasional promotional materials to you via email. We try to respect your time and attention by controlling the frequency of our mailings. Each email sent contains an easy way for you to cease receiving email from us. If you wish to do this, simply follow the instructions found at the end of any email. If you have received unwanted, unsolicited email sent via this system or purporting to be sent via this system, please forward a copy of that email with your comments to profservices.tt@massytechnologies.com. Regardless, we reserve the right to contact you for informational or account related purposes when we believe it is necessary.

Information You Elect to Share:

You may access other Third-Party Services through the Services – e.g. by clicking on links to those Third-Party Services from within the Site. We are not responsible for the privacy policies and/or practices of these Third-Party Services, and you are responsible for reading and understanding those Third-Party Services' privacy policies. This Privacy Policy only governs your Personal Information and other information collected on the Services.

Aggregate Information:

We may share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non -Personal Information about you that they have independently developed or acquired.

Access to Payment Processor Information:

As stated above, we use Payment Processors to collect and store financial information. However, we may from time to time request and receive some of your financial information from our Payment Processors for the purposes of completing transactions you have initiated through the Services, protecting against or identifying possible fraudulent transactions, and otherwise as needed to manage our business.

Information Disclosed for Our Protection and the Protection of Others:

We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to: (i) Satisfy any applicable law, regulation, legal process or governmental request; (ii) Enforce this Privacy Policy and our Terms and Conditions of Service, including investigation of potential violations hereof; (iii) Detect, prevent, or otherwise address fraud, security or technical issues; (iv) Respond to user support requests; or (v) Protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

Information We Share With Your Consent:

Except for data sharing described in this Privacy Policy, you will be notified when your Personal Information may be shared with third parties, and will be able to refuse the sharing of such information.

Information Disclosed Pursuant to Business Transfers:

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this Privacy Policy.

Accessibility to Personal Information

If you are a registered user, you can access information and ask for correction of your information, if necessary, that is associated with your Account by logging into the Services. Registered and unregistered users can access and delete cookies through their web browser settings.

Deletion of Personal Information

Registered users shall have the ability to delete Personal Information related to their full name, company name, and identifiable billing information through their Accounts. Such deleted Personal Information will no longer be stored in Massy Technologies databases, with the exception of: email address, network logs or cases where fraudulent or otherwise illegal activity has been deemed to have occurred as determined by law enforcement or Massy Technologies, in which case such information may remain in Massy Technologies database for the purposes of addressing any such fraudulent or otherwise illegal activity.

To have your email permanently removed, or to delete your Account, please email Massy Technologies at profservices.tt@massytechnologies.com. If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

Options Regarding Personal Information

You can use some of the features of the Services without registering, thereby limiting the type of information that we collect.

You can always opt not to disclose certain information to us, even though it may be needed to take advantage of some of our Services' features.

You may update or remove the information you provided to us by contacting us as described in the Section "Questions or Concerns" below or by emailing us at profservices.tt@massytechnologies.com. To protect your privacy and security, we may also take reasonable steps to verify your identity before updating or removing your information. The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business for disaster recovery purposes. Where permitted by law, your ability to access and correct Personal Information will be limited where access and correction could: (i) Inhibit Massy Technologies ability to comply with a legal or ethical obligation; (ii) Inhibit Massy Technologies ability to investigate, make or defend legal claims; (iii) Result in disclosure of Personal Information about a third party; or (iv) Result in breach of a contract or disclosure of trade secrets or other proprietary business information belonging to Massy Technologies or a third party.

International Data Transfers

Massy Technologies is a regional business with business partners, offices, personnel, regulators, suppliers, etc. in various geographies. We may transfer Personal Information to countries other than the country in which the data were originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your Personal Information to other countries, we will protect that information as described in this Privacy Notice.

In particular, to offer our services, we need to transfer your Personal Information to Canada, where one of our service providers is headquartered. By agreeing to the Privacy Policy, you consent to the transfer of your Personal Information for the purposes described in the Privacy Policy. You have the right to withdraw your consent at any time, but please note that if you do not consent to the transfer or if you withdraw your consent, you may not be able to benefit from all or some of our services.

Questions or Concerns

Massy Technologies is responsible for the processing of your Personal Information. If you have any questions or concerns regarding privacy using the Services, or if you'd like to exercise your rights or choices, including the right to withdraw your consent, please send us a detailed message to profservices.tt@massytechnologies.com. Please note the name of the Site or other online resource to which you provided the information, as well as the nature of the information that you provided. We will use reasonable efforts to respond promptly to requests, questions or concerns you may have regarding our use of Personal Information about you. Except where required by law, Massy Technologies cannot ensure a response to questions or comments regarding topics unrelated to this Privacy Policy or our privacy practices.

Changes to Privacy Policy

This Privacy Policy may be modified from time to time, so please review it frequently. Changes to this Privacy Policy will be posted on the Site and we recommend that you review the Privacy Policy to ensure you are aware of any changes made to it. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Services for the first time after such material changes are made. Please check the Privacy Policy each time you use our Site for the most current information.