

Nationwide Argosy Solutions Privacy Policy (Updated 9/18/2013)

Nationwide Argosy Solutions LLC (NWS LLC) respects your privacy and we are committed to protecting it. We recognize your need for appropriate protection and management of the Personal Information we learn about you while you visit the Website located at www.myargosy.com (the "Website") and our suite of Argosy software. This privacy policy lets you know how we use and protect that information. The information that we receive depends on what you do during your visit and use, and what service(s) you request.

Purpose and Scope

The purpose of this privacy policy is to provide you with about the information we gather when you visit or use our Web Site and Application software, how we use that information and how you can control it or opt-out of our collection.

User Consent

By submitting Personal Information through our Website or Argosy Software, you agree to the terms of this Privacy Policy and you expressly consent to the processing of your Personal Information in accordance with this Privacy Policy.

European Union Users

YOUR PERSONAL INFORMATION MAY BE PROCESSED IN THE COUNTRY IN WHICH IT WAS COLLECTED AND IN OTHER COUNTRIES, INCLUDING THE UNITED STATES, WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY. WE ADHERE TO AND HAVE CERTIFIED OUR COMPLIANCE WITH THE SAFE HARBOR PRIVACY PRINCIPLES, INCLUDING NOTICE, CHOICE, ONWARD TRANSFER, SECURITY, DATA INTEGRITY, ACCESS, AND ENFORCEMENT, OF THE UNITED STATES/EUROPEAN UNION DATA PROTECTION SAFE HARBOR FRAMEWORK AND THE UNITED STATES/SWITZERLAND DATA PROTECTION SAFE HARBOR FRAMEWORK, BOTH OF WHICH ARE MADE AVAILABLE BY THE U.S. DEPARTMENT OF COMMERCE AT [HTTP://WWW.EXPORT.GOV/SAFEHARBOR](http://www.export.gov/safeharbor). OUR CERTIFICATION CAN ALSO BE VIEWED AT [HTTP://WWW.EXPORT.GOV/SAFEHARBOR](http://www.export.gov/safeharbor). IF ANY CLAUSES IN THIS PRIVACY POLICY CONFLICT WITH ADHERANCE TO COMPLIANCE WITH THE SAFE HARBOR PRIVACY PRINCIPLES, THOSE CLAUSES SHALL NOT APPLY.

Collection and Use of Your Information

Customers and individuals who use the Applications are hereafter collectively called "Users", or individually "User". Customer Content and Users' personal and corporate information are collectively called "Customer Information."

Personal Information

When you register for the Website or the ARGOSY Software, request a service or information, place an order, submit feedback or participate in a forum or survey, we may need to ask you for personal information such as your name, address, email address and telephone number ("Personal Information"). In general, we may use any Personal Information you submit to us to create your account on our network; identify you as a user in our system; provide improved administration of our Website and ARGOSY Software; improve the quality of experience when you interact with our Website and ARGOSY Software; send you a welcome e-mail to verify the username and password provided when your account was created; send you administrative e-mail notifications, such as security or support and maintenance advisories; respond to your inquiries related to employment opportunities or other requests; and to make telephone calls to you, from time to time, as a part of our support and maintenance services. If you wish to update any of your Personal Information, please contact us at such email address, and we will use commercially reasonable efforts to update your contact information accordingly. Please be aware, however, even if we update your Personal Information in our contact list, or we remove such information, it may still be stored in other databases (including those kept for archival purposes) and may still be used to compile aggregated or demographic information for supply to third parties in accordance with this privacy policy. It is our policy to not provide information that identifies you personally to a third party without your permission, except to process or fulfill your requests, or as otherwise set forth in this privacy policy. We do not send you information unless you request it or we believe that the information would benefit your business needs. If you do not want to receive further information from us, simply contact us at the email address listed in the Feedback; Removal from Contact List section below, and request to be removed from the contact list. Once we receive your request, we will use commercially reasonable efforts to remove your name from the contact list.

Non-Identifying Information

We may collect information about our visitors, customers, page views, traffic patterns and related site and application information. This information helps us evaluate and improve our Applications and is sometimes useful for marketing and

investment analysis. We may share this information with third parties, but only in aggregate statistical form that includes no personally identifying information.

Use of "Cookies"

Cookies are small files that many web sites place on your hard drive that allow such web sites to identify you. The use of cookies is a standard and common practice of many web sites. For example, if you allow a site to remember your login name or password, the site places a cookie on your computer. We may place cookies on your computer to allow us to identify you during future visits to our Web Site and during use of our Applications. We may use cookies to measure Web traffic, to offer you certain services and to customize your visit. However, if you do not wish to receive cookies, or want to be notified of when they are placed, your browser may permit you to do so. In many browsers, you can change the browser settings to warn you before accepting cookies or to block cookies. If you block cookies, you may not be able to use certain site features or functions, or the Web Site may not operate in an optimal mode.

Security

NWAS LLC has used commercially reasonable efforts to design ARGOSY's Web Site, Applications and Customer's Web Site to make sure that only authorized Users may obtain Customer Information about their projects. Users have a password that must be used each time a User logs-in to ARGOSY's Applications. Users may change their password at any time. NWAS LLC strongly urges Users not to share their passwords with others. Also, NWAS LLC strongly recommends that each User log-out completely after User is finished using ARGOSY's Applications. Unfortunately, no data transmission over the Internet can be guaranteed to be secure, and every system that allows online access is potentially vulnerable to outside attacks from unauthorized third parties. As a result, while NWAS LLC strives to protect Customer Information, NWAS LLC can't and doesn't guarantee or warrant the security of any Customer Information User transmits to NWAS LLC, and User does so entirely at User's own risk. We use reasonable security procedures to protect the information you share with us from unauthorized access or disclosure.

Privacy Protections for Children

Our Web Site and Applications are not directed at children. Therefore, we do not wish to receive, nor do we knowingly collect, Personal Information from minors.

Linked Sites

Our Applications may link to other web sites not controlled by NWAS LLC. Although we try to be careful in the selection of our strategic service and technology partners, we are not responsible for the privacy or security practices of any other web sites, and you acknowledge and agree that any use of such other web sites is entirely at your own risk. You should carefully review the privacy and security practices of the other web sites before you provide such web sites with any of your Personal Information.

Links to Other Sites Users may find links from the ARGOSY Application to independently owned, controlled and/or managed web sites whose content NWAS LLC believes will be of possible interest and value to our Users. Additionally, Users may see links from advertisers, sponsors and other partners that may use NWAS LLC's logo as part of a co-branding agreement. Once a User leaves NWAS LLC's servers, either directly or indirectly, the use of any Customer Information a User provides is governed by the privacy policy of the operator of the site the User is visiting. That policy may differ from NWAS LLC's. If a User can't find the privacy policy of any of these sites via a link from the site's homepage, the User should contact the site directly for more information.

Other Disclosures

Except as otherwise stated in this policy, we do not generally share the Personal Information collected from our services with other entities. However, we may share your Personal Information with third party contractors or service providers to provide you with the services that we offer you through our Website and ARGOSY Software. These third party contractors or service providers are required not to use your Personal Information other than to provide the products or services requested by us. You expressly consent to the sharing of your Personal Information with our contractors and other service providers for the sole purpose of providing products or services to you. We cannot fully ensure, nor do we represent or warrant, that your private communications and other Personal Information will not be disclosed to third parties. For example, we may be required to disclose your Personal Information to the government or other third parties under certain circumstances, or third parties may unlawfully intercept or access transmissions or private communications. Additionally, in the unlikely event we need to investigate or resolve possible problems or inquiries, we can (and you authorize us to) disclose any information about you (including Personal Information) to private entities, law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate. In all instances, we will cooperate fully when required by law to provide information regarding visitors.

Changes to the Privacy Policy

This Privacy Policy is subject to occasional revision, and if we make any substantial changes in the way we use your Personal Information, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our Website. Any material changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our site. These changes will be effective immediately for new users of our Website, ARGOSY Software or related services. Please note that at all times you are responsible for updating your Personal Information to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. In any event, changes to this Privacy Policy may affect our use of Personal Information that you provided us prior to our notification to you of the changes. If you do not wish to permit changes in our use of your Personal Information, you must notify us prior to the effective date of the changes that you wish to deactivate your account with us. Continued use of our Website, ARGOSY Software, or related services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Dispute Resolution

If you believe that NWS LLC has not adhered to this Statement, please contact NWS LLC by e-mail at support@myargosy.com. We will do our best to address your concerns. If you feel that your complaint has been addressed incompletely, we invite you to let us know for further investigation. If you and NWS LLC are unable to reach a resolution to the dispute, you and NWS LLC will settle the dispute exclusively under the rules of the American Arbitration Association.).

Feedback; Removal from Contact List

If you have a question or comment about the Website and/or NWS LLC Software, or wish to update your contact information or be removed from our contact list, please email us support@myargosy.com.

Transfer of Information

Notwithstanding anything expressed or implied in this privacy policy, in connection with an assignment, sale, joint venture or other transfer or disposition of some or all of the assets of NWS LLC, or its affiliated entities, you agree that we can accordingly assign, sell, license or transfer any information, including Personal Information, that you have provided to us to those third parties directly involved in the transfer or disposition of such assets.