PLEASE NOTE: OUR PRIVACY POLICY CHANGES FROM TIME TO TIME AND CHANGES ARE EFFECTIVE UPON POSTING. PLEASE CHECK BACK FREQUENTLY FOR UPDATES AS IT IS YOUR SOLE RESPONSIBILITY TO BE AWARE OF CHANGES. SEACCELERATOR DOES NOT PROVIDE NOTICES OF CHANGES IN ANY MANNER OTHER THAN BY POSTING THE CHANGES AT THIS WEB SITE. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY PLEASE DO NOT PROVIDE ANY INFORMATION TO SEACCELERATOR OR USE ANY OF THE SERVICES OR PRODUCTS OFFERED OR PROVIDED ON ANY OF THE WEB SITES REFERRED TO IN THIS PRIVACY POLICY. This policy applies to SEaccelerator collection, use, storage and disclosure of information by Seaccelerator on its (a) websites, including all its divisions, subsidiaries and related companies (collectively, the "Websites"), (b) on various third party websites, and (c) to SEaccelerator other information collection, including the purchase of customer lists from third parties. SEaccelerator is not responsible for the information collection or privacy practices of third web sites or applications.

# 1. Collection of Information.

**Survey Information.** SEaccelerator collects information from individuals by various methods, including, but not limited to, when an individual voluntarily completes a SEaccelerator order form.

Third Party List Information. SEaccelerator collects information from individuals when an individual provides information to a third party and SEaccelerator subsequently purchases, licenses, or otherwise acquires the information from the third party (the "Seller"). Such purchased information may include, but is not limited

to, an individual's name, email address, street address, zip code, telephone numbers (including cell phone numbers and carriers), birth date, gender, salary range, credit card information, education and marital status, occupation, industry of employment, personal and online interests, and such other information as the individual may have provided to the Seller (together, "Third Party List Information"). When acquiring Third Party List Information, SEaccelerator seeks assurances from the Seller that the Seller has a right to transfer the Third Party List Information to SEaccelerator and that the Seller has a right to provide offers from advertisers to the individuals whose personal information is included on the Seller's list.

Other Information. Other occasions when SEaccelerator obtains information from individuals include (1) when an individual is making a claim for a prize or seeking to redeem an incentive offered by SEaccelerator or by a third party, (2) when an individual requests assistance through SEaccelerator's customer service department, and (3) when an individual voluntarily subscribes to a SEaccelerator service or newsletter (together, "Other Information").

## Cookies, Web Beacons, and Other Info Collected Using Technology.

(a) Cookies. A cookie is a small amount of data stored on the hard drive of the individual's computer that allows SEaccelerator to identify the individual with his or her corresponding data that resides in SEaccelerator's database. You may read more about cookies at http://cookiecentral.com. Individuals who use the Websites need to accept cookies in order to use all of the features and functionality of the Websites.

- (b) Web Beacons. A web beacon is programming code that can be used to display an image on a web page (by using an programming function see http://truste.org for more information), but can also be used to transfer an individual's unique user identification (often in the form of a cookie) to a database and associate the individual with previously acquired information about an individual in a database. This allows SEaccelerator to track certain web sites an individual visits online. Web beacons are used to determine products or services an individual may be interested in, and to track online behavioral habits for marketing purposes.
- (c) New Technology. The use of technology on the Internet, including cookies and web beacons, is rapidly evolving, as is SEaccelerator's use of new and evolving technology. As a result, SEaccelerator strongly encourages individuals to revisit this policy for any updates regarding its use of technology.

**Outside Information.**SEaccelerator may receive information about individuals from third parties or from other sources of information outside of SEaccelerator including information located in public databases ("Outside Information").

# 2. Use of Individual Information.

#### Discretion to Use Information.

SEaccelerator MAY USE INDIVIDUAL INFORMATION FOR ANY LEGALLY
PERMISSIBLE PURPOSE IN COMPANY'S SOLE DISCRETION. The following
paragraphs in Section 2 describe how SEaccelerator currently uses Individual
Information, but SEaccelerator may change or broaden its use at any time. As

noted below, SEaccelerator may update this policy from time to time.

SEaccelerator may use Individual Information to provide promotional offers to individuals by means of email advertising, telephone marketing, direct mail

marketing, online banner advertising, and package stuffers, among other possible

uses.

#### Email.

SEaccelerator uses Individual Information to provide promotional offers by email to individuals. SEaccelerator may maintain separate email lists for different purposes. If email recipients wish to end their email subscription from a particular list, they need to follow the instructions at the end of each email message to unsubscribe from the particular list.

## Content of Email Messages.

In certain commercial email messages sent by SEaccelerator, an advertiser's name will appear in the "From:" line but hitting the "Reply" button will cause a reply email to be sent to SEaccelerator. The "Subject:" line of SEaccelerator email messages will usually contain a line provided from the advertiser to SEaccelerator.

#### Solicited Email.

SEaccelerator only sends email to individuals who have agreed on the Websites to receive email from SEaccelerator or to individuals who have agreed on third party websites to receive email from third parties such as SEaccelerator.

SEaccelerator does not send unsolicited email messages. As a result, statutes

requiring certain formatting for unsolicited email are not applicable to SEaccelerator's email messages.

#### **Targeted Advertising.**

SEaccelerator uses Individual Information to target advertising to an individual. When an individual is using the Internet, SEaccelerator uses Technology Information to associate an individual with that person's Individual Information, and SEaccelerator attempts to show advertising for products and services in which the person has expressed an interest, indicated an interest by means of Technology Information, and otherwise. SEaccelerator may, at its discretion, target advertising by using email, direct mail, telephones, cell phones, and other means of communication to provide promotional offers.

### **Use of Technology Information.**

SEaccelerator uses Technology Information (1) to match a person's Survey Information and Third Party List Information to other categories of Individual Information to make and improve profiles of individuals, (2) to track a person's online browsing habits on the Internet, (3) to determine which areas of SEaccelerator's web sites are most frequently visited. This information helps SEaccelerator to better understand the online habits of individuals so that SEaccelerator can target advertising and promotions to them.

#### Profiles of Individuals.

SEaccelerator uses Individual Information to make a profile of an individual. A profile can be created by combining Survey Information and Third Party List

Information with other sources of Individual Information such as information obtained from public databases.

#### Storage of Individual Information.

SEaccelerator stores the Individual Information in a database on SEaccelerator computers. Our computers have security measures (such as a firewall) in place to protect against the loss, misuse, and alteration of the information under SEaccelerator's control. Not withstanding such measures, SEaccelerator cannot guarantee that its security measures will prevent SEaccelerator computers from being illegally accessed, and the Individual Information on them stolen or altered.

# 3. Privacy Practices of Third Parties.

#### Advertiser cookies and web beacons.

Advertising agencies, advertising networks, and other companies (together, "Advertisers") who place advertisements on the Websites and on the Internet generally may use their own cookies, web beacons, and other technology to collect information about individuals. SEaccelerator does not control Advertisers' use of such technology and SEaccelerator has no responsibility for the use of such technology to gather information about individuals.

#### Links.

The Websites and email messages sometimes contain hypertext links to the web sites of third parties. SEaccelerator is not responsible for the privacy practices or the content of such other web sites. Linked web sites may contain links to web

sites maintained by third parties. Such links are provided for your convenience and reference only. SEaccelerator does not operate or control in any respect any information, software, products or services available on such third party web sites. The inclusion of a link to a web site does not imply any endorsement of the services or the site, its contents, or its sponsoring organization.

## **Affiliated Companies.**

SEaccelerator may disclose, transfer, and sell Individual Information to entities affiliated with SEaccelerator in SEaccelerator's discretion.

#### **Business Transfers.**

As we continue to develop our business, we might sell or buy stores, subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise).

# 4. Unsubscribe Procedures.

If you wish to discontinue receiving email messages from SEaccelerator please write to <a href="mailto:rc@seoaccelerator.ru">rc@seoaccelerator.ru</a>