

PRIVACY POLICY

Effective November 6, 2013

This Privacy Policy (“**Privacy Policy**”) is designed to help you understand how Trade Area Systems, Inc. (collectively, “**TAS**”, “**we**” or “**us**”) collects and uses the information that you share when you use www.tradeareasystems.com and/or other applications and online services that are accessible through various desktop, tablet and mobile web browsers from time to time, including TAS Mobile, TAS Online, TAS Analyst and TAS Viewer (collectively, the “**Sites**” and each a “**Site**”). Except where otherwise expressly indicated in this Privacy Policy or on any Site, this Privacy Policy applies only to information collected on a Site or through the use thereof and does not apply to information that we receive offline. For the purposes of this Privacy Policy, “**you**” or “**your**” shall refer to you as a user of a Site. The term “**Sites**” as used throughout this Privacy Policy shall include the public areas of any Site and any non-public area of a Site that are restricted to Registered Users (as defined in the Terms of Use). This Privacy Policy is incorporated into, and forms an integral part of, the Terms of Use available here http://www.tradeareasystems.com/policies/en_terms.pdf .

Before submitting information to us, please review this Privacy Policy carefully. **BY USING OR ACCESSING ANY SITE, YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE, PLEASE DO NOT USE OR ACCESS THE SITES.** You are responsible for submitting accurate information to the Sites. If you prefer that we not collect your personal information, please do not provide it to us. When you submit your personal and other information on any Site, you hereby consent to the collection, use and disclosure of such information as set forth in this Privacy Policy. Notwithstanding the foregoing, the terms of this Privacy Policy are in addition to, and do not nullify, any other agreement between you and TAS, including any obligations of confidentiality between you and TAS contained in any Authorized User Agreement (as defined in the Terms of Use) between us. In the case of any direct conflict between these Terms of Use and any other agreement between you and TAS related to any Site, the terms of such other agreement shall control but only to extent applicable to the conflicting provisions.

INFORMATION WE COLLECT

TAS collects the following types of information from users of the Sites:

1. Personal Information

TAS may receive and store any information that you enter on any Site or provide to TAS in any other way on or through a Site that would allow TAS to identify you or contact you (“**Personal Information**”). Personal Information will be used by TAS only in accordance with this Privacy Policy. The following are examples of the Personal Information we may gather from you in connection with your use of the Sites:

- your name, email address, telephone number, employer’s name and address, your job title and other personal information provided on a registration form, if you are a Registered User;
- the names and email addresses of those who communicate with TAS by email;
- email address of any person that you provide in connection with your use of certain features of a Site; and
- information you provide about yourself when you apply for employment via a Site.

We maintain one or more databases to store your Personal Information and may retain it as reasonably required to fulfill the purposes identified herein. Providing your Personal Information to us is your choice. If you choose not to provide us with certain Personal Information, you may not be able to take advantage of certain features of the Sites and/or related services.

2. General Information

TAS may receive and store certain types of technical information and other categories of general non-personal information (“**General Information**”) whenever you interact with TAS through a Site. We may combine such General Information with Personal Information and may use and disclose the combined information as described in this Privacy Policy. Examples of the General Information that TAS may collect from you are:

(a) Aggregate Information

In connection with your visit to or use of any Site, TAS may automatically collect usage information, such as the numbers of users and frequency of use and other statistical information. This data is only used in the aggregate as a statistical measure and not in a manner that would identify you personally.

(b) Information Collected Automatically

TAS may receive and record your browser information, operating system information, IP address, the page you requested, the page that directed you to a Site, search terms used to locate a Site, the date, time and length of stay, specific pages accessed during visits to a Site, the website that you go to when you leave a Site and, any downloading you performed from a Site. This information does not identify or track you personally.

(c) Cookies and Tracking Devices

When you view a Site, we may store some information on your computer. This information will be in the form of a “cookie” or similar file or device that allows TAS to deliver customized information to you. These files and devices allow us to tailor a Site to better match your interests and preferences. You may set your browser to notify you of or decline the receipt of such files or devices. Certain features of a Site may not, however, function properly or be available to you if your browser is configured to disable such files or devices.

(d) Email Communications

When you send an email to TAS, either through the “Contact” area on a Site or otherwise, TAS may retain your e-mail address and the contents of the email that you send. This Privacy Policy does not apply to content, business information, ideas, concepts or inventions that you send to TAS by email. Please refer to the Terms of Use for TAS’ policy with respect to such information. If you want to keep the information in your email(s) private or proprietary, please do not send such information in an email to TAS.

HOW TAS USES YOUR INFORMATION

When you provide TAS with your Personal Information, TAS may use it to manage its registry of Registered Users, facilitate communication between TAS and you and/or provide you with other information TAS feels may be of interest to you. TAS also uses information collected to customize, analyze, adjust and improve the Sites to meet users’ needs. TAS also may use the information to enforce TAS’ agreements with you, to prevent fraud and other prohibited or illegal activities and for other legally permissible purposes. Additional uses of your Personal Information may include, without limitation, the following:

1. Public Areas

Personal Information collected in public areas of the Sites is used solely for the purpose for which it is collected. For example, Personal Information provided in connection with your request for a demonstration of our products and services is used solely to contact you about a demonstration; likewise, Personal Information that you submit to a Site in connection with your interest in the TAS employment opportunities described on such Site is used solely to consider you for such employment opportunities.

2. Restricted Areas

Information that you make available in or through non-public areas of the Sites or on Sites that are restricted solely to users with certain login credentials provided by TAS may be viewed, accessed or collected by, or disclosed to, other users that you invite to view such information or who otherwise have rightful access to such non-public area or Site, and such information may be used by such other users in ways neither you nor TAS are able to control or predict, including, without limitation, disclosure of your information to the public or to contact you for unauthorized purposes.

TAS may use the Personal Information that you provide when you become a Registered User (as defined in the Terms of Use) to send you information about Registered User benefits, features of the Sites that are accessible to you as a Registered User and other information that TAS believes is relevant and useful to you. TAS does not sell the names, mailing addresses and email addresses of Registered Users to third parties.

3. Aggregate Information

TAS uses information collected from you to determine user trends and needs and to improve the Sites, as well as to produce aggregate statistics of Site users that include anonymous statistical demographic information, in part to supply market research to potential advertisers and partners. This information is only used in the aggregate (e.g., as a statistical measure) and not in a manner that would identify you personally.

4. Emails and Newsletters

From time to time, TAS may use your Personal Information to send you important administrative information regarding the Sites and related services or changes to this Privacy Policy, the Terms of Use or other terms and policies. TAS also may use your Personal Information to send you periodic emails and newsletters with information on new products and services, updates to the Sites or upcoming events. You may at any time “opt out” of having your Personal Information as part of TAS’ mailing list (see “Controlling Your Information” below).

WITH WHOM TAS SHARES INFORMATION

TAS will not disclose your Personal Information to any third party, other than under the following circumstances:

1. Third-Party Service Providers

TAS may retain other companies and individuals to perform functions on TAS’ behalf. TAS may share your Personal Information with such third-party service providers to perform these functions consistent with this Privacy Policy, and such third parties may not use your Personal Information for any other purpose.

2. Compliance with Law and Fraud Protection

TAS may disclose any information, including without limitation Personal Information, that TAS deems necessary, in its sole discretion and without your prior permission, to comply with any applicable law, regulation, legal process or governmental request. TAS also may exchange information, including without limitation Personal Information, with other companies and organizations for credit fraud protection, risk reduction and related activities or to protect the rights, property or safety of TAS and its agents, employees or affiliates or others. TAS reserves the right to disclose a user’s Personal Information if TAS believes the user is in violation of this Privacy Policy, the Terms of Use or any other user policy available on a Site, even without a subpoena, warrant or other court order.

3. Sale or Transfer of Information

In the event of a sale, merger, liquidation, dissolution or sale or transfer of substantially all of the assets of TAS or the Sites, Personal Information and/or other information collected about you via the Sites may be sold, assigned or transferred to TAS’ lender(s) or prospective acquiror(s), as well as the party acquiring all or substantially all of the equity and/or assets of TAS or any of the Sites, in order to permit the party to continue the operation of the

applicable Site or service. By using the Sites, you consent to the sale and transfer of your information as described in this paragraph.

CONTROLLING YOUR INFORMATION

TAS respects your privacy. If you tell TAS that you do not wish to have your Personal Information used as a basis for further contact with you, TAS will respect your wishes. You also may choose not to provide TAS with certain information, but that may result in your inability to use certain features of the Sites and related services.

You may instruct TAS to stop sending you materials (e.g., email messages, newsletters) or to remove your Personal Information from TAS' database by (a) sending an email with your email address and your opt-out instructions to info@tradeareasystems.com, (b) if available, following the unsubscribe instructions provided in those materials or (c) sending your opt-out request via post to the mailing address for TAS below.

TAS may, however, continue to use your Personal Information to contact you to service your account, or as otherwise authorized by law. Please note that if you use more than one name or email address when communicating with TAS or using the Sites, you may continue to receive communications from TAS to any name and/or e-mail address not specified in your opt-out request. If you would like to modify or delete your Personal Information (including, without limitation, your username, password, email address, contact information or other Personal Information), please send an email to info@tradeareasystems.com with clear instructions about the information that you would like to have modified or deleted. You must promptly update your Personal Information if it changes or is inaccurate.

If you have been provided a username and password to access a Site or a non-public area of a Site, you are responsible for all actions taken with your username and password. Therefore, we recommend that you do not disclose such username or password to anyone. You may not allow others to use your username or password to access or use any part of a Site. If your username or password has been compromised for any reason, you should contact us immediately for a new username and password. Upon your request, we will deactivate your password and remove your contact information from our active databases. We will retain in our files the Personal Information you have asked us to remove from our active databases to prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our user policies and comply with legal requirements. Therefore, you should not expect that your Personal Information will be completely removed from our databases in response to your request. However, such Personal Information will only be available to select employees, service providers and governmental persons or entities.

THIRD PARTY LINKS

The Sites may contain links to third party websites. Please be aware that TAS cannot control and is not responsible for the information collection practices of such websites, which may differ from those of TAS. TAS encourages you to review and understand the privacy policies of these websites before providing any information to them.

SECURITY

TAS maintains a variety of commercially reasonable physical, electronic and procedural safeguards designed to protect your Personal Information from unauthorized access and disclosure. For example, TAS uses accepted tools and techniques to protect against unauthorized access to TAS' systems. You should be aware that TAS has no control over the security of other websites on the Internet that you might visit or with which you might interact even when a link may appear to another site from the Sites. Although TAS takes steps to secure your information, TAS does not promise, and you should not expect, that your Personal Information, searches or other communications will always remain secure. In the event of a breach of the confidentiality or security of your information, including your Personal Information, TAS will notify you as necessary and if possible so that you can take appropriate protective steps. TAS may notify you under such circumstances using the email address(es) that TAS has on record for you and/or by regular mail (if available).

CHILDREN'S PRIVACY

To use any of the Sites, you must be the age of legal majority in your place of residence. By using any Site, you hereby represent that you are at least the age of legal majority in your place of residence. All information provided to TAS will be treated as if it was provided by an adult. If, however, we learn that a minor has submitted information about himself or herself to us, we will delete the information as soon as possible and comply with all applicable laws, including the U.S. Children's Online Privacy Protection Act. TAS does not knowingly market to, solicit information, accept service or collect information online from minors without verifiable parental consent.

CHANGES TO THIS PRIVACY POLICY

At any time without prior notice, TAS may update this Privacy Policy to reflect changes in TAS' practices. If TAS makes any material change to this Privacy Policy, TAS will notify you by sending an email to the last email address provided by you to TAS or by prominently posting notice of the changes on the Sites. TAS will offer you the opportunity to opt-out of any materially changed Privacy Policy. TAS encourages you to 'bookmark' this Privacy Policy and to periodically review it to inform yourself of changes to it or any of TAS' other policies. Any changes to this Privacy Policy will become effective upon TAS' posting of the updated policy. Use of any of the Sites constitutes your acceptance of the terms of this Privacy Policy then in effect.

CALIFORNIA PRIVACY RIGHTS

If you are a resident of California ("**California Users**"), in addition to the rights set forth in this Privacy Policy, you generally have the right to request information from TAS regarding the manner in which TAS shares certain categories of Personal Information with third parties for their direct marketing purposes.

Under the law, however, a business is not required to provide this information if it adopts and discloses to the public (in its privacy policy) a policy of not disclosing customer's Personal Information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying California Users of their rights to prevent disclosure of Personal Information and providing a cost-free means to exercise that right. As stated above, TAS does not share such Personal Information with third parties for their direct marketing purposes unless you have requested TAS to do so or have otherwise consented and then only subject to your right to opt-out of sharing your Personal Information for third party marketing purposes.

Please note that whenever you opt in to receive future communications from a third party, your information will be subject to such third party's privacy policy. If you later decide that you do not want such third party to use your information, you will need to contact such third party directly, as TAS has no control over how third parties use information. You should always review the privacy policy of any party that collects your information to determine how it will handle your information.

If you wish to make such a request, please send an e-mail to TAS at: info@tradeareasystems.com.

USERS FROM OUTSIDE THE UNITED STATES

Each of the Sites is hosted in the United States. The Sites are governed by applicable federal, state and local laws. If you are visiting a Site from outside the United States, your information may be transferred to, stored and processed in the United States. The data protection and other laws of the United States and other countries may not be as comprehensive as those in your country. By visiting the Sites, submitting information or using any of TAS' products or services, you acknowledge that you accept the practices and policies outlined in this Privacy Policy and consent to having your data transferred to and processed in the United States. If you do not agree to this Privacy Policy, please do not use any of the Sites.

NO RIGHTS OF THIRD PARTIES

This Privacy Policy does not create rights enforceable by third parties.

CONTACTING US

If you have any questions about this Privacy Policy, the practices of any of the Sites or your dealings with us, please feel free to contact TAS at:

Trade Area Systems, Inc.

555 Pleasant Street

Suite 201

Attleboro, MA 02703

<http://www.tradeareasystems.com>

Phone: 508-223-3003

Fax: 508-222-5055

Email: info@tradeareasystems.com