



February 18, 2015

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# Privacy Policy

## Our Commitment

CPC has adopted this Privacy Policy (hereinafter “Privacy Policy”) to inform you of its collection and use of your personal or personally identifiable information. CPC values your privacy and has adopted this policy in an effort to remain transparent with respect to its collection of this information.

It is our commitment to maintain the principles of integrity and trust with respect to the protection of personal information. As part of our commitment, we will protect the privacy of personal information of employees, clients, customers and others individuals whose personal information we collect, use and disclose.

## Definitions

“business contact information” means information that enables an individual to be contacted at work, including his/her name, title, business address, business telephone number, fax number and e-mail address.

“employee personal information” means personal information about an employee that is collected used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship, but does not include other personal information about the employee.

“personal information” means any information that personally identifies an individual, but does not include business contact information or work product information.

”work product information” means information prepared or collected by an individual or group of individuals as part of their employment or business responsibilities or activities related to their employment or business.

## Responsibility

We are responsible for all personal information under our control.

## Purposes

We collect personal information for the following purposes:

- to communicate separately with you;
- to facilitate your movements throughout our website;
- to be able to selectively send you communications that may be of interest to you, either electronically or otherwise;



## **Collection**

We will only collect personal information for the purposes we have identified above and that are reasonable in the circumstances.

Depending on how you have configured your browser, when you access our website, a small file – a “cookie” – may be created by our server and stored on your computer. A cookie cannot be used to access or otherwise compromise the data on your hard drive. If you arrive at our website with your browser configured to disable cookies, you will not be identified.

## **Aggregate Information**

We use this aggregate information to help diagnose problems with our servers, to administer our website, and to gather broad demographic information. None of this information is connected with your personal information.

## **Links to Other Sites**

We are not responsible for the content or the privacy policies of websites to which our website may link and our privacy policy does not apply to those websites. These other websites may send their own cookies to users, collect data, or solicit personal information. While we strive to protect our clients’ personal information, we cannot guarantee the security of any information you disclose online, you disclose such information at your own risk.

## **Revisions to this Policy**

CPC reserves the right to suspend, replace, modify, amend, or terminate this Privacy Policy at any time and within its sole and absolute discretion. In the event CPC replaces, modifies, or amends this Privacy Policy, the Last Updated date, located at the top of this Agreement, will change. Your continued use of the Website after a change in the Last Updated will constitute your manifestation of assent to and agreement with any replacement, modification, or amendment herein.