

# Privacy Statement

## April 2009

### Privacy

Fetter Logic, Inc. (“Fetter Logic”) firmly believes that protecting the privacy and security of our customers’ information is one of our primary and fundamental responsibilities. We are dedicated to protecting your confidential information as set forth in this Privacy Statement.

We understand that you expect the information you have entrusted to us to be handled with great care. We do not disclose any nonpublic information about our customer or former customers to anyone, except as necessary to provide Fetter Logic services or as otherwise permitted or required by law. Please be assured that we will never provide information that we may obtain to any affiliate or to any associate without a need to know.

### Security Procedures

We keep your information secure by:

- Maintaining physical, electronic, and procedural safeguards that comply with or exceed federal standards to protect your nonpublic information
- Limiting access to information about you to those associates who need to know to provide you products or services
- Training our associates about the importance of maintaining the confidentiality of customer information; and
- Taking appropriate disciplinary action to enforce our associates’ privacy responsibilities

### How and Why We Obtain Client Information

Fetter Logic uses information collected about you or your organization to provide you with the highest quality of service you have come to expect from us. We may use this information in order to offer, develop and deliver products and services; process transactions for you; respond to inquiries from you; or fulfill regulatory and legal requirements.

If you are a former client, your information is treated in the same manner as the information of current clients

## How We Protect Your Information

Fetter Logic has always considered the protection of sensitive information to be a mandatory business practice and a foundation of client trust. We employ extensive information protection controls in keeping with industry standards and practices, and we regularly improve these physical, electronic and procedural controls to respond to changing requirements and advances in technology.

We have and actively enforce very strong confidentiality agreements with all employees. The agreements clearly identify customer information and require that it be held in the strictest confidence. These agreements delineate (a) Fetter Logic's information and (b) that of our customers and clients. It clearly states that the employee is responsible for understanding what constitutes confidential information and maintaining it as such. We also practice "ongoing education." Security and confidentiality policies are re-published to employees every quarter and policies are re-discussed regularly in company meetings. We require that employees adhere the privacy policies including some of the following examples:

- Employees log off all computers and servers before leaving the premises
- All administrator passwords are in sealed envelopes and securely locked up with only manager level access
- All passwords are changed every 45 days or less; and
- Any document to be discarded with client information, internal financial information, project lists, personnel information, or anything with a client name appearing anywhere must be shredded or put into the shredding bins daily before the employee leaves the office

Within Fetter Logic and among our partners, we restrict access to information to those who require that access in order to provide products and services to you. We maintain physical and system barriers to our IT equipment and systems. These include redundant firewalls, strong passwords, multiple physical locks, virus protection, alarms and constant monitoring.

We may share the personal information that we collect with the following entities:

- Affiliates, including affiliated service providers
- Government agencies, other regulatory bodies and law enforcement officials; and
- Other organizations, with your consent (for example, if you use us as a financial reference in applying for credit with another institution)

## Additional Online Protection

Fetter Logic uses a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures. We also use cookies and similar files that may be placed on your hard drive for security purposes, to facilitate site navigation, and to personalize your experience on our site.

When you visit Fetter Logic's Internet sites, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web sites. This information may be used, for example, to alert you to software compatibility issues; or it may be analyzed to improve our Web design and functionality.

## Version History

| Version Number | Date           | Reason/Comments                               |
|----------------|----------------|---|
| V1.00          |                | Original Draft                                |
| V1.10          | April 23, 2009 | Updated formatting and reworted some sections |
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