PRIVACY DISCLOSURE STATEMENT

PLEASE READ THIS PRIVACY DISCLOSURE STATEMENT CAREFULLY

Thank you for visiting http://www.colsonassociates.com/ (the “Website”). Colson Associates, Inc. (referenced further as “Company,” “we,” “us” and “our”) respects your individual privacy and values your confidence. This Privacy Disclosure Statement (this “Statement”) explains what information may be collected on our Website, how we may use this information, including our successors, parents, subsidiaries, affiliates, and related companies, and under what circumstances we may disclose the information to third parties.

We keep this Statement posted on our Website, and you should review it frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Statement.

IMPORTANT – THIS IS A LEGAL AGREEMENT BETWEEN YOU AND THE COMPANY. WHEN YOU ACCESS OUR WEBSITE, YOU CONSENT TO THE TERMS OF THIS STATEMENT. IF YOU DO NOT AGREE TO THIS STATEMENT, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITE.

TYPES OF INFORMATION WE MAY COLLECT

Personally Identifiable Information: Personally Identifiable Information (“PII”) is any information that may be used to specifically identify or contact you, such as your name, postal and email addresses, or phone number. Certain information may not be personally identifiable when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and name). As a general rule, we do NOT collect PII when you visit our Website, unless you choose to provide such information to us. You do not have to provide any PII to visit or use the Website. If you choose to provide us with information about yourself, as in an email message, questionnaire, form, or other tool submitted through our Website, we only use that information to respond to your message. By providing such information, you are giving us your permission to do so. We will not disclose, give, sell, or transfer any PII about visitors to our Website, unless required by law enforcement or by statute.

Non-Personal Information: Non-personal information is any information that does not personally identify you. Non-personal information can also include certain PII that has been de-identified; that is, information that has been rendered anonymous. Non-personal information related to your visit to our Website may be automatically collected and temporarily stored, such as your IP address or other unique identifiers that are automatically assigned to your computer, mobile or other device used to access the Website; the type of browser you are using; the third party website from which your visit originated; the operating system you are using; the domain name of your Internet service provider; the search terms you use on our Website; the specific areas within our Website or Service that you visit; and/or the time of day and duration of your visits. We may also obtain non-personal information about you from information that you voluntarily provide us. We do not disclose, give, sell, or transfer any non-personal information about visitors to our Website, unless required by law enforcement or by statute.

USE OF COLLECTED INFORMATION

The information collected through our Website may be used to fulfill your requests and respond to your inquiries, and in other ways naturally associated with the circumstances in which you provided the information. We also reserve the right to disclose and transfer all such information to a subsequent owner, co-owner or operator of the Company’s business, Website or applicable database; or in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our stock and/or assets or other corporate change, including, during the course of any due diligence process. We may use non-personally identifiable information that we may collect in a variety of ways, including to administer the Website, help us analyze site traffic, understand trends, improve the quality of the pages that make up our Website, gather broad demographic information, and to improve our Website services. We may use your non-personal information by itself or aggregate it with information we have obtained from others.

Notwithstanding anything herein to the contrary, we reserve the right to disclose any PII or non-personal information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website, or other users; or (d) in an emergency to protect the health and safety of our users or the general public.
ADDITIONAL DETAILS

A few of the methods and/or avenues that may be used to collect non-personal information include, without limitation, the following (and subsequent technology and methods hereafter developed):

**Cookies.** “Cookies” are small text files or other similar files placed and stored on the hard drive of a computer, mobile or other device when it is used to access the Website. Cookies may be used for many purposes, including, but not limited to, remembering you and your preferences and tracking your visits to our Website. If you do not want information to be collected through the use of cookies, your browser allows you to deny or accept the use of cookies. Cookies can be disabled or controlled by setting a preference within your web browser or on your device. You should be aware that the Company cannot control the use of cookies (or the resulting information) by third-parties, and use of third party cookies is not covered by this Statement.

**IP Addresses.** An IP address is a number that is assigned to your computer, mobile or other computing device whenever you are surfing the Internet. Web servers (computers that “serve up” web pages) automatically identify your computer or other computing device by its IP address. When users request pages from our Website, our servers may log their IP addresses. We may collect IP addresses for the following purposes, among others: system administration, to report non-personal aggregate information, and to track the use of our Website.

**Email Communications.** If you send us an email with questions or comments, we may use your PII to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public personal information to us by email. We reserve the right to send you transactional emails such as customer service communications.

COLLECTION OF INFORMATION BY OTHER WEBSITES

Our Website may contain links to the sites of our affiliates, subsidiaries or other third parties. These sites may have information practices different from ours. You should exercise caution and consult the privacy notices of all other websites before accessing such websites. Company has no control over the privacy practices employed by any other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide while visiting such websites and such websites are not governed by this Statement.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits Users that are residents of California to request from companies conducting business in California a list of all third parties to which the company has disclosed certain PII as defined under California law for such third parties’ direct marketing purposes. If you are a California resident and would like to make such a request, please email Company at administration@colsonassociates.com or write Company at the address noted below.

PROTECTING CHILDREN

We take special care to protect the safety and privacy of children. Any features or aspects of our Website which may require the submission of information are not intended for anyone under 18 years of age. No one under age 13 may provide us any information to or on the Website. We do not knowingly collect PII from children under the age of 13. If you are under 13, do not use or provide any information about yourself on this Website. If you use the Website, you hereby represent and warrant that you are at least 13 years of age. In compliance with the Children’s Online Privacy Protection Act, any information we receive from users we believe to be under the age of 13 will be purged from our database.

KEEPING YOUR INFORMATION SECURE

For site security purposes and to ensure that our Website remains available to all users, we may employ software programs to identify unauthorized attempts to upload or change information, or otherwise cause damage. When you submit information to us through our Website, you should be aware that your information is transmitted across the Internet, and that no method of transmission over the Internet is 100% secure. We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. While we strive to protect your privacy, we cannot guarantee or warrant the security of any information you choose to disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your PII. In the event your PII (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) is compromised, we may notify you by e-mail (at our sole and absolute discretion) to the last e-mail address you have provided us in the most expedient time reasonable under the circumstances; provided, however, delays in notification may occur while we take necessary measures to determine the scope of the breach and restore reasonable integrity to the system as well as for the legitimate needs of law enforcement if notification would impede a criminal investigation.
MEDICAL ADVICE / HEALTH DISCLAIMER
THE INFORMATION CONTAINED ON THE WEBSITE IS PRESENT FOR THE PURPOSE OF GENERAL EDUCATION, AND IS NOT INTENDED TO CONSTITUTE MEDICAL ADVICE, INSTRUCTION FOR MEDICAL DIAGNOSIS, OR INSTRUCTION FOR MEDICAL TREATMENT. THE INFORMATION CONTAINED ON THE WEBSITE IS NOT A SUBSTITUTE FOR PROFESSIONAL MEDICAL ADVICE, DIAGNOSIS OR TREATMENT. IN NO EVENT WILL COMPANY BE LIABLE TO USER OR ANYONE ELSE FOR ANY DECISION MADE OR ACTION TAKEN BY USER OR ANYONE ELSE IN RELIANCE UPON THE INFORMATION PROVIDED ON OR THROUGH THE WEBSITE.

CONTACT INFORMATION
You may contact us as at the following contact information if you have questions or comments about our Statement. To protect your privacy and security, we will take reasonable steps to help verify your identity before responding or granting any requests.

Contact Information:
Colson Associates, Inc.
One North Franklin Street, Suite 2400
Chicago, Illinois 60606 USA
Phone: 312.980.1100
Fax: 312.980.1111
administration@colsonassociates.com

SOLE STATEMENT
This Statement as is posted on the Website at http://www.colsonassociates.com/, and is the sole statement of our Privacy Disclosure Statement with respect to this Website. No summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy.

Last Updated: September, 2016.