

Privacy Policy

1. Introduction

Alluster is committed to maintaining your privacy, and the accuracy and security of your personal information pursuant to applicable legislation. This Privacy Policy summarizes the principles and guidelines we follow in collecting, using and disclosing personal information about you and other individuals and in responding to requests for information in our custody or control.

Please note that we reserve the right to modify or amend this Policy at any time and for any reason. Please check the Alluster website, currently at www.Alluster.com at any time for the most current version of our Policy.

Other than as required or permitted by law, we will not change the purposes for which we collect, use or disclose your personal information without (a) giving you notice and (b) obtaining your consent to do so. We will give you such notice by posting any modification, change or amendment on our website or otherwise corresponding with you.

2. Personal Information

In this Policy, "personal information" or "personally identifiable information" means information or data about an individual who is or can be identified by the information or data, or who can be identified by our using that information or data in connection with other information or data that we may obtain about the same individual.

3. Our Need for Personal Information

We collect, use and disclose personal information in order to provide the services we offer, to operate our business and to comply with applicable law. It is our policy to do so lawfully and fairly and for reasonable purposes. Unless otherwise required by applicable law, Alluster will collect, use and disclose your personal information only in accordance with this Policy. If you register with us as a Member (as defined in our Terms of Use), we will be entitled to use and disclose your personal information for purposes reasonably related to our contract with you and the services we provide to you or on your behalf or at your request or as set out in this Policy.

4. Notification and Consent

Unless otherwise required or permitted by applicable law, we will first notify you of the purposes for which we collect, use or disclose personal information about you.

It is our policy to require consent from you before collecting, using or disclosing your personal information. Consent may be given orally, electronically (for example, by clicking a button) or in writing. There may be situations in which your consent may be implied or inferred from the circumstances, taking into account reasonable expectations of individuals and the sensitivity of the personal information in question.

If you register with us as a Verified Member, we will advise you of this Policy. If you object to any of your personal information being collected, used or disclosed as described in this Policy or as otherwise required or permitted by law, you should not register with us as a Verified Member.

It is our policy to obtain only as much personal information as is required for the purposes identified or as otherwise required or permitted by law.

Once you have provided personal information to us, your continuing to do so and to deal with us with knowledge of this Policy will be considered by us to confirm your ongoing consent to our collection, use and disclosure of your personal information in accordance with this Policy unless and until you advise us otherwise.

5. Third Party Web Sites

Third party web sites are governed by their own privacy statements and not by this Policy. Third party sites may also be subject to the laws of different countries where requirements and obligations to you are different. Alluster has no control over and is not responsible for the privacy practices or the content of third party web sites, third party referrals or web site links.

6. How and Why We Collect Personal Information

Required Information

To open and maintain an Account (as defined in our Terms of Use), we require that you provide us with the following information.

your company's name;
your first and last name;
your e-mail address;
a password;
your website information.
IP Address/Computer Information

We may collect the Internet address (IP address) of the computer or device you use to access your Alluster Account, as well as information about the computer or device you use, such as the CPU identifier or hard disk identifier, in order to analyze trends, administer the site, improve site performance, gather broad demographic or user profile information for aggregate use, and to help detect or prevent fraud, illegal activity or unauthorized transactions.

Information About You From Third Parties

In order to detect or prevent fraud, illegal activity or in order to assist us in investigating suspected violations of our Terms of Use, we may collect and disclose personal information from and to third parties. We may conduct a credit check or obtain a consumer report on you from a credit bureau or consumer reporting agency for identification verification and collection purposes.

Alluster, at its sole discretion, reserves the right to suspend or terminate an Account or decline a transaction based on information obtained from third parties.

Web Site Traffic Information

Because of the way that World Wide Web communication standards work, when you arrive at or leave the Alluster website, our servers automatically receive the Web address of the site that you came from or are going to. We also collect information on which pages of our Web site you visit while you are on the Alluster website, the type of browser you use and the times you access our Web site. We use this information only to try to understand our Members' preferences and user profiles better and to manage the load on our servers, so as to improve our service and your experience with Alluster. We may use the services of a third party to collect and analyze click stream or other user data. In such cases, we may then tie the data from such third party to your personal information stored by us internally.

Our Use of "Cookies"

"Cookies" are small files of data that reside on your computer and allow us to recognize you as a Alluster customer if you return to the Alluster site using the same computer and browser. We send a "session cookie" to your computer if and when you log in to your Account by entering your e-mail address and password. These cookies allow us to recognize you if you visit multiple pages in our site during the same session, so that you don't need to re-enter your password multiple times. Once you log out or close your browser, these session cookies expire and no longer have any effect.

Most browsers allow you to turn off cookies. If you want to know how to do this please look at the help menu on your browser. However, switching off cookies will severely restrict your ability to use the Alluster site.

Customer Service Correspondence and Phone Calls

If you send us correspondence, including e-mails and faxes, we retain such information in the records of your Account. We will also retain customer service correspondence and other correspondence from Alluster to you. We retain these records in order to measure and improve our customer service, and to investigate potential fraud and violations of our Terms of Use. We may, over time, delete these records if permitted by law and will destroy or render them anonymous once there is no legal or business purpose for retaining them.

In addition, your phone calls to and from us will be monitored and/or recorded for quality assurance, training and security protection purposes.

Questionnaires, Surveys and Profile Data

From time to time, we offer optional questionnaires and surveys to our Members for such purposes as collecting demographic information or assessing Members' interests and needs. The use of the information collected will be explained in detail in the survey itself. If we collect personal information from our Members in these questionnaires and surveys, the Members will be given notice of how the information will be used prior to their participation in the survey or questionnaire.

Alluster will not sell or rent any of your personal information to third parties.

Alluster will not share any of your personal information with third parties except in the limited circumstances described below, or as required or permitted by applicable law, or with your express permission. These third parties, where possible, are limited by law or by contract from using personally identifiable information for secondary purposes beyond the purposes for which the information is shared.

We may share personal information with organizations that help us process the transactions you request, such as payment processing companies or credit card processing companies, or organizations that verify and validate your identification and financial information, or that help protect our Members' transactions from fraud, such as sharing your credit card number with a service that screens for lost and stolen card numbers. We may also share personal information with organizations that provide support for our internal operations, including, without limitation, contact centre support service providers and server and database service providers, so that we may fulfill our obligations to you.

In order to detect or prevent fraud, illegal activity or in order to assist us in investigating possible instances of fraud, illegal activity or suspected violations of our Terms of Use, we may disclose personal information to third parties where we believe it is reasonable to do so.

We disclose personal information to government agencies, court or law enforcement personnel in response to applicable legislation or regulations, or to any subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action. We reserve the right to cooperate with legal authorities having actual or potential jurisdiction over us.

We may disclose personal information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).

We may disclose personal information to third party service providers who manage various marketing programs or promotional initiatives on our behalf or who provide us with demographic information.

As with any other business, it is possible that Alluster in the future could amalgamate or merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to personal information maintained by Alluster, including customer account information, but would continue to be bound by this Policy unless and until it is amended as described in this Policy.

7. Our Contacts with Alluster Customers

We communicate with users on a regular basis via e-mail to provide and assist in requested services, and we also communicate by phone to resolve customer complaints or investigate suspicious transactions. We use your e-mail address to confirm your opening of a Alluster Account, to send information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, Members cannot opt out of these communications, but they will be primarily informational in nature rather than promotional.

8. Information Security and Protection

Alluster is committed to handling your personal information with high standards of information security. We restrict access to your personally identifiable information to employees who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

We protect your information from error, loss, and unauthorized access. Our employees who have access to your information are made aware of how to keep it confidential. Each employee must sign an agreement stating that maintaining confidentiality is a condition of employment with Alluster. All of your personal information is collected, used, and disclosed for business purposes only.

The security of your Alluster account also relies on your protection of your Alluster security identification. You may not share your password or Account with anyone. Alluster will never ask you to send your password to us in an e-mail, though we may ask you to enter this and other personal information on the Alluster website, which will always have a URL beginning with <https://www.Alluster.com>

Any e-mail or other communication asking you to provide personal information via email, or linking to a website with a URL that does not begin with <https://www.Alluster.com> should be treated as unauthorized and suspicious and should be reported to Alluster immediately. If you do share your password or Account with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your Account and your personal information, and you will be responsible for actions taken using your password or Account. If you believe someone else has obtained access to your security identification or password, please change it immediately by logging in to your account at www.Alluster.com and changing your Options settings, and also contact us right away.

We retain your personal information for as long as required to provide services to you. Following the end of any relationship we may have with you, your personal information will be retained for as long as is necessary for reasonable business or legal purposes, following which it will be securely destroyed or rendered anonymous. If we or you terminate your Account, we will mark your Account in our database as "Closed," but will keep your Account information in our database. This is necessary in order to investigate potential fraud, for instance by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their Account and opening a new Account. However, if your Account is terminated, your personally identifiable information will not be used or disclosed by us for any further purposes, nor sold or shared with third parties, except as necessary to detect or prevent fraud and assist law enforcement, or as required by law.

9. Updating Your Information

You can review the personal information you provided us and make any desired changes to such information, or to the settings for your Account, at any time by logging in to your Account on the Alluster web site and changing your preferences in the Account Summary page of your Account.

10. Your Choices

You may refuse to provide personal information to us. You may also withdraw your consent at any time, subject to applicable legal or regulatory restrictions, and reasonable notice. We do require that withdrawal of consent be in writing. However, if you refuse to provide personal information or withdraw your consent to our using or disclosing your personal information, this may severely limit our ability to provide our services to you as we may be unable to process your transactions. If you do withdraw your consent, it is our policy to advise you of the consequences of doing so.

11. Accessing Your Personal Information

You may contact us at any time to pursue your rights to access personal information about you in our custody or control. All such requests must be in writing. To make a request, simply contact us as set out below in Section L. Upon request and subject to applicable law, we will respond in writing with, as applicable in the circumstances, the following information:

Whether we have personal information about you;

If so, details of what information we have, the purposes for which it is being processed or used and disclosed, and the recipients or classes of recipients to which such information is or may be disclosed; and

Any information available to us with respect to the source of information where we are able to determine that and where we are legally able to disclose such information to you. It is our policy to respond to such requests within 30 days wherever possible. We reserve the right to charge any fee permissible by law to provide a response to your request. We will also require that you provide sufficient information to allow us to locate your information to deal with your request. In some circumstances, we may be able to extend the period of time within which we respond and, if we do so, we will advise you of that.

An individual's ability to access his or her personal information is not absolute. The law imposes restrictions on our ability to provide you with access. For example, where responding to a request requires providing personal information about another individual, we generally cannot do so without that individual's consent, which may not be granted. However, we will provide as much information as we can without breaching any other legal requirements or the privacy rights of other individuals. There are also situations, such as the prevention, detection or investigation of crime or breaches of the law, in which our ability to provide information may be restricted. We reserve all our rights under applicable law.

12. Contacting Us

You may contact us if you have any questions or concerns about this Policy, our personal information practices, or the accuracy or completeness of any personal information concerning you in our files, or to update any of your personal information. You can contact us via e-mail at support@Alluster.com, Attention: Privacy Compliance.