

We self-certify compliance with



for more information visit: www.export.gov/safeharbor

APVO PRIVACY POLICY

APVO respects your right to privacy and complies with the relevant laws governing the privacy of your information in the countries in which we and our related companies operate. APVO complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. APVO has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view APVO's certification, please visit <http://www.export.gov/safeharbor/>.

We have established a comprehensive privacy program, including a global privacy office and a chief privacy officer, designed to help us respect and protect your data privacy rights. This statement includes both APVO's U.S. Safe Harbor Privacy Statement and the Website Privacy Statement.

It describes APVO's policies and procedures on the collection, use and disclosure of your information.

We believe in protecting your privacy. When we collect personal information from you on our website, we comply with the U.S.-EU Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union.

Definitions:

The terms "APVO," "viadeo.com," "we," "us", "our," "You(r)", and "Website" have the same meaning here as they do in the "Terms of Use" section of our website.

"Personal Information" or "Information" means information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about or pertains to a specific individual; and (4) can be linked to that individual.

Here are our promises to you:

Information We Collect and Use

APVO receives your information through the disclosures you and some third-parties make and uses it to provide our services to you. The information that we collect, store and use is exclusively intended to help you build your professional network.

When using any of our services you expressly consent to the collection, transfer, manipulation, storage, disclosure and other uses of your profile information as described in this Privacy Policy.

Irrespective of which country that you reside in or create information from, Your Personal Information may be used by APVO in the United States and any other country where we or our related companies operate.

For personal information of individuals that we receive from the European Economic Area, we have committed to handling such personal information in accordance with the Safe Harbor Principles. Our Safe Harbor certification can be found at <http://web.ita.doc.gov/safeharbor/shlist.nsf/webPages/safe+harbor+list>.

We collect information at different times and in different ways as follows:

Information Collected Upon Registration: You need an APVO account to access the services. You must provide personal information, such as your name, email address, country of origin and password when you create the account. You will also provide some additional information, such as your biography, your location, or a photograph. This information is listed publicly on our services.

Additional Information: You may customize your account with information imported from your webmail address book so that we can help you find users you know. We may use your contact information to send you information about our services. If you email us, we may keep your message, email address and contact information to respond to your request.

Internet Protocol Address: This website uses Internet Protocol (IP) Addresses. An IP Address is a number assigned to your computer by your Internet service provider so you can access the Internet. Generally, an IP Address changes each time you connect to the Internet (it is a “dynamic” address). Note, however, that if you have a broadband connection, depending on your individual circumstance, it is possible that your IP Address that we collect, or even perhaps a cookie we use, may contain information that could be deemed identifiable. This is because with some broadband connections your IP Address doesn’t change (it is “static”) and could be associated with your personal computer. We use your IP Address to report aggregate information on use and to help improve the website.

Lists and other Public Information: Our services are designed to help you share professional information with the world. Most of the information you provide to us is information you are asking us to make public.

Our default is almost always to make the information you provide public but we give you the opportunity to make the information more private if you want. Your public information is broadly and instantly disseminated. For example, your public information is searchable by many search engines and is immediately delivered to a wide range of users and services. As a result, you should be careful about all information that will be made public by APVO.

Log Information: Our servers automatically record information (“Log Information”) created by your use of the services. Log Information may include information such as your browser type and version, operating system, IP address, the referring domain, pages visited, and search terms. Other actions, such as interactions with advertisements, may also be included in Log Information.

Cookies: Like many websites, we use “cookies” to provide our services when you visit our site. “Cookies” are small alphanumeric files that are transferred to your computer's hard disk. We use them for several purposes. For example, they allow us to recognize you so you do not have to reenter your login information every time you log onto our website. They also allow us to collect website usage information so we may monitor aggregate user usage, understand better

how users interact with our services and route web traffic most efficiently. We do not require cookies for many parts of our services such as searching and looking at public user profiles or lists. You may deactivate the use of cookies by changing your preferences in your Internet browser. In this case, certain APVO features may no longer be available.

Information Sharing and Transfer

We use Your Personal Information to provide to you our various services. We do not and will not disclose Your Personal Information to third parties, except in the limited circumstances described here.

Your Consent: We may share or disclose Your Personal Information with your express or implied consent, such as when you use a third party web client to access your account.

Service Providers: We engage certain trusted third parties to perform functions and provide services to us. We may share Your Personal Information with these third parties, but only to the extent necessary to perform these functions and provide such services, and only pursuant to obligations that include the protections of this privacy policy.

Legal: We may disclose your information, including your IP address, in order to comply with a law, regulation, court order, or other legal request to protect the security of persons and property, to address technical issues, or to protect APVO's rights or property.

Business Transfers: We may also provide Your Personal Information to a third party in connection with the sale or other transfer of the business of this website to which the information relates, in which case we will require any recipient of Your Personal Information to agree to treat Your Personal Information in accordance with this privacy policy. The promises in this privacy policy will apply in full to the recipient of your information.

Non-Private or Non-Personal Information: We may share or disclose your non-private, aggregated or otherwise non-personal information, such as the number of users who clicked on a particular link.

Modifying Your Personal Information

You own your personal information. You have a full right of access, modification and deletion of your personal information. You may exercise this right by accessing the APVO Web site, clicking on the "Profile" and "Edit" section and using the tools we have provided to you or by writing to the customer service department at contact@viadeo.com.

Protection of Your Information

Areas of this website that collect Your Information use industry standard secure socket layer encryption (SSL); however, to take advantage of this your browser must support encryption protection (found in Internet Explorer release 3.0 and above).

Our Policy Towards Minors

Our services are not directed to minors (persons under the age of 18). If you are under the age of 18, we ask that you not open an APVO account. If you know that a minor has provided us with personal information, please contact us at privacy@viadeo.com. If we become aware that a minor has provided us with personal information, we will take steps to remove such information and terminate the minor's account.

Your Responsibility

Users may make certain information or contents (including but not limited to biographical data, photos and videos) available on the website. Users are wholly responsible for all such information and contents, including information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health.

By providing such information on the website, users explicitly consent to the processing of this information by APVO and freely accept exclusive responsibility for doing so.

Changes to this Policy

We may revise this privacy policy from time to time. The most current version of the policy will govern our use of your information and will always be accessible at <http://www.viadeo.com/privacy>. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an update or e-mail to the email associated with your account. By continuing to access or use the services after those changes become effective, you agree to be bound by the revised Privacy Policy.

Data Security

We take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have put in place physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. Company has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Company cannot guarantee the security of Information on or transmitted via the Internet.

Data Integrity

We only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, we take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Access

We allow each individual to access his Personal Information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

Enforcement

We use a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Safe Harbor Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

When we receive formal written complaints at this address, it is our policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between us and an individual.

Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on this website.

More information

We adhere to the US Safe Harbor Privacy Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement, and are registered with the [U.S. Department of Commerce's Safe Harbor Program](#). For more information about the Safe Harbor framework or our registration, please visit the U.S. Department of Commerce's Website at <http://export.gov/safeharbor/>.

Contact Information

Questions, comments or complaints regarding the Company's Safe Harbor Policy or data collection and processing practices can be mailed or emailed as follows:

APVO Corporation
Attn: Chief Privacy Officer
301 Howard Street, Suite 1440
San Francisco, California 94105

Email: privacy@viadeo.com

Effective date: August 15, 2010