

# TerraNua

## Privacy Statement

## TABLE OF CONTENTS

<b>1. OUR COMMITMENT TO PROTECTING YOUR PRIVACY</b>	<b>3</b>
<b>2. HOW AND WHY WE OBTAIN PERSONAL INFORMATION</b>	<b>3</b>
<b>3. HOW WE PROTECT INFORMATION ABOUT YOU</b>	<b>4</b>
3.1 ACCESSING, CORRECTING, OR DELETING PERSONALLY IDENTIFIABLE INFORMATION	5
3.2 TRACKING TECHNOLOGIES	5
3.3 TRUSTE	5
<b>4. ABOUT SAFE HARBOR</b>	<b>6</b>
<b>5. PRIVACY PRINCIPLES</b>	<b>6</b>
5.1 NOTICE	6
5.2 CHOICE	7
5.3 ONWARD TRANSFER (TRANSFERS TO THIRD PARTIES):	7
5.4 SECURITY	7
5.5 DATA INTEGRITY	7
5.6 ENFORCEMENT	7
<b>6. DO WE SHARE INFORMATION ABOUT YOU WITH OUR 3RD PARTY SERVICE PROVIDERS?</b>	<b>8</b>
<b>7. SECURITY OF OUR HOSTED SOLUTIONS</b>	<b>8</b>
<b>8. LINKS TO OTHER WEBSITES</b>	<b>9</b>
<b>9. SOCIAL MEDIA WIDGETS</b>	<b>9</b>

**10. CONTACT INFORMATION ..... 9**

**1. OUR COMMITMENT TO PROTECTING YOUR PRIVACY**

TerraNua Ltd. And TerraNua U.S. Corp (collectively known as “TerraNua”) acknowledges that the privacy of the data provided to use is of paramount importance to our clients and our prospective clients. Consequently, TerraNua considers the obligation to ensure the proper security of all personal data that passes through its control as critical to its business model via electronic or non-electronic methods. This Privacy Statement (“Statement”) describes how TerraNua collects, uses, and discloses certain personally identifiable information that it receives in the United States from the European Union ("EU Personal Data") both on our Web site located at [www.mycomplianceoffice.com](http://www.mycomplianceoffice.com) and offline.

TerraNua uses a range of security measures to ensure the highest level of security of data passing between our clients and our hosted systems, designed to prevent confidential information being viewed or tampered with by unauthorized persons.

If we decide to change our privacy statement, we will post those changes to this privacy statement, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this statement, we will notify you here, by email, or by means of a notice on our home page prior to the change becoming effective.

**2. HOW AND WHY WE OBTAIN PERSONAL INFORMATION**

There may be certain sections of the [www.mycomplianceoffice.com](http://www.mycomplianceoffice.com) website owned by TerraNua that ask you to provide personal information. Examples include request for product information, requesting a demo, contacting us, or a Free Trial. We use this information to respond to inquiries from you or your representative. If you choose not to register and provide this information, you can continue to view our sites anonymously.

The information we collect is Name, Company, Email address and phone number.

Receiving our newsletter is provided as part of the service that we offer. If you no longer wish to receive our newsletters you may opt-out at any time by following the instructions included in each newsletter or by emailing us at [info@mycomplianceoffice.com](mailto:info@mycomplianceoffice.com).

Within the customer login the only information users are able to view your assignments, cases assigned to you or created by you, your trades, brokerage accounts and holdings.

### **3. HOW WE PROTECT INFORMATION ABOUT YOU**

For users registered on [www.mycomplianceoffice.com](http://www.mycomplianceoffice.com), each user has a unique username and password, which is authenticated on login. Any data transmitted over the website is protected by SSL, which is a method of encrypted communication transfer. This maintains the security of your online session.

Personal data is stored in a protected environment (Firewalls). We use privacy protection controls and restrictions on employee access in order to safeguard your personal information. TerraNua employees must abide by all procedures designed to incorporate the principles herein. Authorized personnel only access personal information to conduct business on your behalf, service your account, and help you achieve your compliance objectives.

All TerraNua employees are provided training to ensure that they can identify personal data, classify it correctly and handle this information according to our privacy protection controls. Annual reviews of our control process are carried out. This ensures that we can determine the effectiveness of our controls and keep up to date on new legislation as well as process changes.

We maintain physical, electronic and procedural safeguards to protect personal information to comply with the applicable laws and regulations of the client's country of operation, and we regularly adapt these controls to respond to changing requirements and advances in technology. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We therefore cannot guarantee absolute security. If you have any questions regarding security on our site, you can contact us at [info@mycomplianceoffice.com](mailto:info@mycomplianceoffice.com).

TerraNua aim to comply with all applicable country, state and federal privacy law, including (but not limited to) California and Massachusetts privacy law. TerraNua employees are prohibited from sending data over an unencrypted connection that includes both accounts and names. If clients are sending data in this manner, they should load it into a file in the Firm Documents section of MyComplianceOffice which uses an encrypted transmission. These data files can then be removed later. In the event of a security breach, TerraNua will notify the relevant authorities to comply with all applicable legislation. This includes notification of security breaches to appropriate local, state, provincial or federal authorities such as Information/Privacy Commissioners or as applicable by the relevant legislation.

TerraNua provide clear accountability to protect all privacy information. A Chief Security Officer (CSO) is appointed who is responsible for all security and privacy related issues. The CSO is a member of the senior management team and is accountable for management buy-in, oversight on privacy training, attestations and handling of complaints.

### 3.1 Accessing, Correcting, or Deleting Personally Identifiable Information

If your personally identifiable information changes, or if you no longer desire our service, you may update or delete inaccuracies by emailing our Customer Support at [support@mycomplianceoffice.com](mailto:support@mycomplianceoffice.com) or by contacting us by postal mail at the contact information listed below. We will respond to your request to access within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [support@mycomplianceoffice.com](mailto:support@mycomplianceoffice.com). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### 3.2 Tracking Technologies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site for authentication, and for tracking user activity so as to enhance the user's experience of our site. Users can control the use of cookies at the individual browser level and can choose to reject them. You may continue to use our site if you reject cookies, but your ability to use some features or areas of the site may be limited.

Technologies such as cookies, beacons, tags, and scripts are used by TerraNua, our third party tracking utility partner, affiliates, and/or analytics or service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

As is true of most web sites, we gather certain information automatically and store it in log files. The information gathered may include Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do link this information to other information we collect about you.

### 3.3 TRUSTe

TerraNua has been awarded TRUSTe's Privacy Seal signifying that this privacy statement and practices have been reviewed by TRUSTe for compliance with TRUSTe's program requirements including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program covers only information that is collected through this Web site,

[www.mycomplianceoffice.com](http://www.mycomplianceoffice.com) and does not cover information that may be collected offline. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy statement or practices, please contact us at [info@mycomplianceoffice.com](mailto:info@mycomplianceoffice.com). If you are not satisfied with our response you can contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.

TerraNua participates in the EU and Swiss Safe Harbor Privacy Framework as set forth by the United States Department of Commerce. As part of our participation in the safe harbor, we have agreed to TRUSTe dispute resolution for disputes relating to our compliance with the Safe Harbor Privacy Framework.

You can find TRUSTe's fax and postal mail information at <http://www.truste.com/about> <http://www.truste.com/about-TRUSTe/contact-us>  
TRUSTe's Dispute Resolution process is only available in English.

TerraNua complies with the U.S. – E.U. 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 data from European Union member countries and Switzerland. TerraNua 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 TerraNua's certification, please visit <http://export.gov/safeharbor>.

## 4. ABOUT SAFE HARBOR

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (the "Safe Harbor Principles") to enable U.S. companies to satisfy the requirement under European Union law that adequate protection be given to personal information transferred from the EU to the United States. The EEA also has recognized the U.S. Safe Harbor as providing adequate data protection (OJ L 45, 15.2.2001, p.47). Consistent with its commitment to protect personal privacy, TerraNua adheres to the Safe Harbor Principles.

## 5. PRIVACY PRINCIPLES

The privacy principles in this Statement are based on the following Safe Harbor Principles.

### 5.1 Notice

TerraNua will inform employees about the purposes for which personal information will be collected and used. Information will be provided on how employees can contact TerraNua with any inquiries or complaints regarding the use of this data. TerraNua will give notice on the type of third parties to

whom it discloses this information and the means the organizations use to restrict the disclosure and use of this data.

## 5.2 Choice

For personal information it collects from individuals, TerraNua will offer these individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. For personal information, individuals will be given affirmative and explicit (opt-in) choice as to whether their information can be disclosed to a third party or used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. TerraNua also treats any sensitive information it received from a third party when that third party identifies it as sensitive information.

## 5.3 Onward Transfer (Transfers to Third Parties):

Before disclosing any sensitive information to a third-party, TerraNua will apply the Safe Harbor Notice and Choice Principles. Where TerraNua needs to transfer information with a third party it will first ascertain if it subscribes to the Safe Harbor Principles or is subject to the directive. If required, TerraNua will enter into a written agreement with a third party to ensure that it provides at least the same level of personal data protection. If the third party handles personal information contrary to this statement then TerraNua will take reasonable steps to prevent or stop such processing.

## 5.4 Security

TerraNua uses reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. This applies to all personal information created, maintained, used and disseminated by TerraNua.

## 5.5 Data Integrity

TerraNua will only use personal information according to the Safe Harbor Principles and consistent with the purposes for which it intended. TerraNua will not process personal information in a way that is incompatible with the purposes for which it was collected and authorized by the individual who provided the information. TerraNua will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete and current.

## 5.6 Enforcement

TerraNua's privacy practices are self-certified as defined by the Safe Harbor Framework. In order to ensure compliance with the Safe Harbor Principles, TerraNua take the following measures:

- Provides an independent recourse mechanism by which individual complaints and disputes are investigated and resolved by reference to the Principles and damages awarded where the applicable law or private sector initiatives so provide.

- Provide a follow up procedures for verifying that attestations and assertions that businesses make about their privacy practices are true and that privacy practices have been implemented as presented.
- Are obliged to resolve problems arising out of failure to comply with the Principles by organizations announcing their adherence to them and consequences for such organizations.
- All questions and concerns regarding the use or disclosure of personal information will be handled by the TerraNua compliance office, available at the address given below. TerraNua will attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this statement. For complaints that cannot be resolved between TerraNua and the complainant, TerraNua has agreed to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles.

## 6. DO WE SHARE INFORMATION ABOUT YOU WITH OUR 3RD PARTY SERVICE PROVIDERS?

TerraNua does not share, sell, rent, or trade personal information about our current and prospective clients with third parties other than as disclosed within this privacy statement.

We may use third-party service providers to help us analyze certain online activities. These are restricted to helping us measure the performance of our website advertising, or analyze aggregate visitor activity on our websites. These companies are authorized to use your personal information only as necessary to provide these services to us. They do not personally identify the visitor.

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site.

If TerraNua is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email, and/or a prominent notice on our Web site, of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

## 7. SECURITY OF OUR HOSTED SOLUTIONS

Our SaaS (Software as a Service) products are hosted with SSAE 16 Type II compliant providers who have signed a Non-disclosure agreement with TerraNua. This infrastructure is audited by external experts to ensure fully up to date SSAE 16 Type II compliance. No personal client information is ever disclosed to our service providers.



## 8. LINKS TO OTHER WEBSITES

TerraNua websites may contain links to other websites. If you link to another website, you will leave TerraNua's site, and its privacy statement is no longer applicable.

## 9. SOCIAL MEDIA WIDGETS

Our Web site includes Social Media Features, such as the Twitter and LinkedIn buttons and Widgets or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy statement of the company providing it.

## 10. CONTACT INFORMATION

You can contact us regarding any of our policies at

TerraNua,  
535 5<sup>th</sup> Avenue, 4<sup>th</sup> Floor,  
New York, NY 10017

Ph 212-852-9028

[info@TerraNua.com](mailto:info@TerraNua.com)

Effective Date: March 2015