



## Astrea Website Privacy Policy

This website privacy policy (“Privacy Policy”) describes the practices of CCI Systems, Inc. d/b/a/ Astrea (“Astrea”) regarding Personal Information collected via its website at [www.astreaconnect.com](http://www.astreaconnect.com) (the “Website”). This Privacy Policy applies only to Personal Information that we gather or collect via the Website. It does not apply to any information collected offline or otherwise outside of the Website.

**1. What Information Does the Website Collect?** When you visit our Website, we may collect two types of information that can be used to identify you (“Personal Information”): (1) information that you voluntarily provide to us, and (2) information related to your activities on the Website that we automatically collect as you interact with the Website (“Website Usage Information”).

**(a) Personal Information You Voluntarily Provide.** We collect Personal Information when you voluntarily fill out a form on the Website, register, subscribe to a newsletter, send us a message, or if you use another feature on the Website that requires Personal Information. We will collect whatever Personal Information you voluntarily provide (e.g., name, phone number, postal address, e-mail address, credit card number, cardholder name, expiration date, message content, order information). If you fill out an online form, we will collect whatever information you enter into the form and whatever data, files or materials you upload. Please note that information submitted to the Website via a “Contact Us” form or similar function may not receive a response. You are under no obligation to provide Personal Information, but if you elect not to provide it, you may be unable to use certain features of the Website or to communicate with us via the Website.

**(b) Website Usage Information.** When you visit the Website, we and our service providers use a variety of technologies that automatically or passively collect or store certain Website Usage Information related to your activities on the Website. Website Usage Information may include your IP address or other unique identifier; your device functionality (e.g., browser, operating system, hardware, mobile network information); the URL that referred you to our Website; the areas within the Website that you visit and your activities there; your device location and characteristics and certain other device data, including the time of day and other information. For example, we use Google Analytics to help us understand how our customers interact with the Website – you can read more about how Google uses your information here: <https://policies.google.com/privacy>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>. The technologies used on the Website may set, change, alter or modify settings or configurations on your device. These technologies may include, without limitation, cookies (a small data file placed on your computer when you visit the Website), web beacons (small graphic images or other web programming code that may be included in our web pages and e-mail messages), embedded scripts (code that is designed to collect information about your interactions with the Website, such as which links you click on), ETags, or other similar technologies. Many browsers have an option for disabling cookies, which may

prevent your browser from accepting new cookies or enable selective use of cookies. A user who has disabled cookies may not be able to access certain areas of the website.

**(c) Children.** The Website does not offer products or services to children, and we do not knowingly collect any Personal Information from children younger than the age of thirteen (13). We will delete any Personal Information collected that we later determine to be from a person younger than the age of thirteen (13).

**2. How do we use the Information Collected?** We may use your Personal Information or Website Usage Information for various purposes. For example, we use such information to: (1) respond to your inquiries and personalize your experience on the Website; (2) improve our Website or our products and services; (3) provide you with information about products, services, and special offers and other information you request; (4) solicit information from you, manage your account and process payment transactions; (5) for internal business purposes; (6) administer a contest, promotion, survey or other Website feature; (7) provide you with services and products; (8) to comply with applicable laws; and (9) for any other purpose disclosed to you at the time of collection or that you consent to. In addition, Website Usage Information we collect may be used for a number of purposes, such as system administration or security, to help us understand the demographics of visitors to the Website, to enhance the performance and usefulness of the Website, and to audit use of the Website.

**3. Sharing of Personal Information With Third Parties.** We may share Personal Information with third parties under various circumstances. These include, for example:

**When You Request Information From or Provide Information to Third Parties.** You may be presented with an option on the Website to receive certain information or marketing offers directly from third parties or to have us send certain information to third parties or give them access to it. In these instances, your Personal Information and other information may be disclosed to third parties and all the information you disclose will be subject to the privacy policies and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and therefore you should review their privacy policies prior to requesting information from or otherwise interacting with them.

**Third Parties Providing Services on Our Behalf.** We may share Personal Information with third parties who perform services on our behalf. This includes, without limitation, third parties that: host the Website; operate certain functions or features of the Website; archive data; send communications; analyze data; and provide other services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys or contests, data security functions, and fraud prevention.

**Affiliates, Business Transfers and Corporate Changes.** We reserve the right to share Personal Information with our affiliates and in connection with a corporate divestiture, merger, consolidation, or restructuring, the sale of substantially all of our ownership interests and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process or in the event of bankruptcy, insolvency or dissolution.

**Administrative and Legal Reasons.** We may also disclose and transfer Personal Information to third

parties: (i) in the event we are required to do so to satisfy an applicable law or regulation, to respond to a court order, subpoena, discovery request, or other legal process, or if in our good faith opinion such disclosure is required by law; (ii) at the request of governmental authorities conducting an audit, investigation or other inquiry; (iii) to verify or enforce compliance with other agreements or policies governing the Website, or applicable laws, rules, and regulations; or (iv) whenever we believe disclosure is necessary to limit our legal liability or to protect or enforce the rights, interests, or safety of our company, customers or the Website, its users or other third parties; and in connection with our Terms of Use and other agreements. We also reserve the right to investigate, prevent, or take action regarding illegal or suspected illegal activities and to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful.

**Sweepstakes, Contests and Promotions.** We may offer sweepstakes, contests and promotions (any, a “Promotion”) through the Website that may require registration. By participating in a Promotion, you are agreeing to official rules that govern it, which may contain specific requirements of you, such as, allowing the Promotion sponsor to use your name, voice and likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of the Promotion, including in connection with winner selection, prize fulfillment and as required by law or permitted by the official rules, such as on a winners list.

**4. User Generated Content.** The Website may permit you to submit ideas, photographs, data, music, video, audio recordings, user profiles, graphics, questions, comments, suggestions or other content, including Personal Information, on blogs, message boards and forms (collectively, “User Content”). User Content is public and shared with any third party that visits our Website, and others may have access to User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, including Personal Information, as User Content.

**5. Third Party Content and Links on the Website.** The Website may contain content that is supplied by third parties and those third parties may collect Website Usage Information when pages from the Websites are served to you. In addition, when you are on the Website you may be directed to other sites operated and controlled by third parties that we do not control. We are not responsible for the data collection and privacy practices used by any of these third parties or their sites. We encourage you to note when you leave our Website and to review the third party privacy policies of all third party locations and exercise caution in connection with them.

**6. Security.** We strive to protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission, or electronic storage of information can be guaranteed to be completely secure, which means we cannot and do not guarantee the security or confidentiality of any Personal Information you provide to us. Please consider this prior to submitting Personal Information to us via the Website. The confidentiality of your password for the Website is your responsibility.

**7. Your Choices About Personal Information.** You may opt-out of receiving future communications from us by clicking on the “unsubscribe” link at the bottom of any email from us. If you have any questions regarding your Personal Information or our use of Personal Information, please contact us via one of the methods provided below.

**8. Changes to the Privacy Policy.** We reserve the right to change this Privacy Policy at any time without notice to you. Any changes will be effective immediately upon the posting of the revised Privacy Policy. By continuing to use our Website after such revisions are in effect, you accept and agree to the revisions. We encourage you to periodically review this Privacy Policy to be informed of how we use your Personal Information.

**9. Contact Us; Questions.**

If you have any questions about this Website you may contact us via e-mail at [ask@astreaconnect.com](mailto:ask@astreaconnect.com), via phone at +1-800-236-8434, or via mail at:

Astrea  
Attn: Website Administrator Astrea  
105 Kent Street  
Iron Mountain, MI 49801

If you have any questions about Privacy you may contact us via e-mail at [privacy@ccisystems.com](mailto:privacy@ccisystems.com), via phone at 1-906-771- 2500, or via mail at:

Astrea  
Attn: Privacy Astrea  
105 Kent Street  
Iron Mountain, MI 49801

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