MIS Privacy Statement

Our Privacy Commitments

MIS Training Institute Holdings, Inc. (together "we") respect the privacy of every person who visits or registers with our websites ("you"), and are committed to ensuring a safe online experience. This Privacy Statement outlines the information we may collect about you in relation to your use of our websites and services ("personal data") and how we may use that personal data. It also outlines the methods by which we and our service providers may monitor your online behaviour in order to deliver customised advertisements and marketing materials and other tailored services. This Privacy Statement also tells you how you can verify the accuracy of your personal data and how you can request that we delete or update it.

This Privacy Statement applies to all websites operated by us (as indicated on the relevant website) ("Sites"). For the purpose of this Privacy Statement "Group Company" shall mean MIS Training Institute Holdings, Inc. and any of its subsidiary companies. Please note that the Sites may contain links to external sites and may contain advertisements for, and/or the opportunity for you to purchase products or services from third parties. This privacy statement does not cover the activities of such third parties, and you should consult those third party sites' privacy policies for information on how your data is used by them.

By accessing and using the Sites you are agreeing to the terms of this Privacy Statement.

Information about us
Our principal business activities are:

- Organizers of Seminars, Conferences, Training Courses and Exhibitions for Internal Audit, IT Audit, Fraud, Risk and Information Security.

MIS Training Institute Holdings, Inc. Company Address:
153 Cordaville Road, Suite 200
Southborough
MA 01772

MIS Training (UK) Limited
Duke’s House
32-38 Duke’s Place
London
EC3A 7LP

Name of the Data Controller
The Data Controller is MIS Training (UK) Limited
MIS Training Institute Holdings, Inc. is subject to the UK Data Protection Act 1998 and is registered in the UK with the Information Commissioner’s Office.

Collection of Personal Data
Our primary goal in collecting personal data from you is to give you an enjoyable customised experience whilst allowing us to provide services and features that most likely meet your needs. We collect certain personal data from you, which you give to us when using our Sites and/or registering or subscribing for our products and services. However, we also give you the option to access our Sites’ home pages without subscribing or registering or disclosing your personal data. We do not collect information about our Site visitors, registered users or subscribers from other sources, such as public records or bodies, or private organisations.
Please note that we do not intend to collect any personal data from children under thirteen years of age and no child under thirteen should submit any personal data to any of the Sites. Should we discover that any such personal data has been delivered to any of the Sites, we will remove that information as soon as possible.

Types of Personal Data Held and its Use

1. **Customer Services and Administration**
   At some Sites, MIS Training collects personal data such as your name, job title, work and/or home address, and telephone number and email address in order to register you for access to certain content and subscriptions. This information may be supplemented with demographic information from your use of our Sites such as your postal area, age, gender, purchasing preferences and interests.
   At other Sites, MIS Training may only collect broad demographic information for aggregate use.
   This information is used to administer and deliver to you the products and/or services you have requested, to operate our Sites efficiently and improve our service to you, and to retain records of our business transactions and communications. By using the Sites and submitting personal information through the registration process you are agreeing that we may collect, hold, process and use your information (including personal information) for the purpose of providing you with the Site services and developing our business, which shall include (without limitation) the purposes described below in paragraphs 2 and 3.

2. **Monitoring use of our Sites**
   Where, as part of our Site services, we enable you to post information or materials on our Site, we may access and monitor any information which you upload or input, including in any password-protected sections. We also monitor and/or record the different Sites you visit and actions taken on those Sites, e.g. content viewed or searched for. If you are a registered user (e.g. a subscriber or taking a trial), when you log on, this places a cookie on your machine. This enables your access to content and services that are not publicly available.
   Once you are logged on, the actions you take - for example, viewing an article - will be recorded. We may use technology or a service provider to do this for us. This information may be used for one or more of the following purposes:
   - to fulfil our obligations to you;
   - to improve the efficiency, quality and design of our Sites and services;
   - to see which articles, features and services are most read and used
   - to track compliance with our terms and conditions of use, e.g. to ensure that you are acting within the scope of your user licence;
   - for marketing purposes (subject to your rights to opt-in and opt-out of receiving certain marketing communications) - see paragraph 3 below;
   - for advertising purposes, although the information used for these purposes does not identify you personally. Please see paragraph 5 below for more details;
   - to protect or comply with our legal rights and obligations; and
   - to enable our journalists to contact and interact with you online in connection with any content you may post to our Sites.

3. **Marketing:**
   Some of your personal data collected under paragraphs 1 and 2 above may be used by us and/or our other group companies and third party service providers to contact you by email, fax, telephone and/or post for sending information or promotional material on our products and/or services and/or those of our other group companies.
We give you the opportunity to opt-out of receiving marketing communications and will in certain circumstances need to obtain your consent before sending such communications to you. Further detail can be found on the applicable Site and in each marketing communication sent by us, our group companies or service providers. See also "Consents and opt-outs" section below.

4. **Trading in Personal Data:**
Some of your personal data may be collected and processed with the intention of selling it to other organisations, but this will not be done unless you have given your consent (separately to this privacy statement).

5. **Cookies and interest based advertising**
   5.1 **Cookies**
   All our Sites use "cookies". A cookie is a text file placed on your hard drive by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. They are uniquely assigned to you and can only be read by a Web server in the domain that issued the cookie. As mentioned above, cookies can be used to track behaviour on our Sites, building online profiles of our customers.

   Cookies are either used only during your session ("temporary" or "session state" cookies) or stored on your computer's hard drive ("permanent" cookies).

   Temporary cookies are a mechanism for maintaining continuity between pages during your visit. These cookies are maintained in your browser's active memory and are terminated at the conclusion of the Site visit. Permanent cookies are used to recall on subsequent visits your login information and your agreement to our terms and conditions.

   Cookies are integral to the functioning of all the Sites. By using your browser's options to block cookies you will effectively prohibit effective use of the Sites. If you still wish to control the operation of cookies, then functionality is available through your browser. Generally you have the options to accept all cookies, to be notified when a cookie is issued or reject all cookies. Please consult your browsers help system for information on how to block cookies. If you are within a corporate environment your systems administrator may have set the preferences for you, in which case their assistance in changing the settings will be required.

   5.2 **Interest based advertising**
   Interest based advertisements on our site are provided by our advertising partner (DoubleClick by Google). Our advertising partner will serve ads that it believes are most likely to be of interest to you, based on certain information about your visit to this and other Sites. This information is collected and used, without reference to other data which could identify you in the real world, in that it does not include your name, street address, email address or telephone number.

   Please note that, to collect this information for advertising purposes, our advertising provider may need to place a cookie (a small text file) on your computer. You have the right to exercise control over the way we collect and use information about your online activities in this way and you are entitled to opt-out of receiving this type of interest based advertising.

   For more information about how cookies and this type of interest based advertising work and how to disable them, you can also visit www.youronlinechoices.co.uk for more information. You can also refer to the privacy policy of DoubleClick by Google if you do not wish to receive interest based advertising on other sites served by their system. DoubleClick can serve an "opt out" cookie to your device. Please note that the effectiveness of any opt-out for interest based advertising may be impacted by deleting all cookies on your browser.
Any other purposes for which MIS Training Institute Holdings, Inc. wishes to use your personal data will be notified to you and your personal data will not be used for any such purpose without obtaining your prior consent.

Consents and opt-outs
You can give your consent to or opt out of particular uses of your data as indicated above by:
- Indicating in a box at the point on the relevant Site where personal data is collected;
- Informing us by email, post or phone; or
- Updating your preferences on the applicable Site; or
- For behavioural advertising, see link in paragraph 5 above.
You can also use your browser's options to control the operation of cookies (please see section 5 above for more details).

Disclosures
Information collected at one Site may be shared between MIS Training Institute Holdings, Inc. and other group companies for the purposes listed above.
Your personal data may also be sold to other companies in the form of lists and directories, but only after permission from you in accordance with the provisions above.
We may also disclose your personal data to other third parties, including, without limitation, professional advisers, or governmental or State institutions or regulatory authorities, where necessary in order to exercise or defend legal rights or where required by law.
We may transfer, sell or assign any of the information described in this policy to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganisation of our business.

Public forums, message boards and blogs
Some of our Sites make message boards, blogs or other facilities for user generated content available and users can participate in these facilities. Any information that is disclosed in these areas becomes public information and you should always be careful when deciding to disclose your personal information.

Transfers outside the EEA
Services on the Internet are accessible globally so collection and transmission of personal data is not always limited to one country. MIS Training Institute Holdings, Inc. may transfer your personal data, for the purposes listed above, to other group companies, service providers or other third parties which may be located in countries outside the European Economic Area, whose laws may not give the level of protection to personal data as within the UK. This will include transfers to third parties who provide us with email and marketing services. Where we conduct any transfers we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement.

Confidentiality and Security of Your Personal Data
We are committed to keeping the data you provide us secure and will take reasonable precautions to protect your personal data from loss, misuse or alteration.
The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features described above to try to prevent unauthorised access.
We have implemented information security policies, rules and technical measures to protect the personal data that we have under our control from:
• unauthorised access
• improper use or disclosure
• unauthorised modification
• unlawful destruction or accidental loss

All our employees, contractors and data processors (i.e. those who process your personal data on our behalf, for the purposes listed above), who have access to, and are associated with the processing of your personal data, are obliged to keep the information confidential and not use it for any other purpose than to carry out the services they are performing for us.

We also give you the option of using a secure transmission method to send us personal data identifiers, such as credit card details and bank account number.

How to Access, Update and Erase your Personal Information

If you wish to know whether we are keeping personal data about you, or if you have an enquiry about our privacy policy or your personal data held by us, in relation to any of the Sites, you can contact the Data Protection Officer via:

North America
- Postal mail to this address: Data Protection Officer, MIS Training Institute Holdings, Inc, 153 Coralville Rd, Suite 200 Southborough, MA 01772
- Email: CustomerService@misti.com

Europe, Middle East, and Asia Pacific
- Postal mail to this address: Data Protection Officer, MIS Training (UK) Limited, Duke’s House, 32-38 Duke’s Place, London, EC3A 7LP
- Email: misti@misti.com

Upon request, we will provide you with a readable copy of the personal data which we keep about you. We may require proof of your identity and may charge a small fee (not exceeding the statutory maximum fee that can be charged) to cover administration and postage.

MIS Training allows you to challenge the data that we hold about you and, where appropriate in accordance with applicable laws, you may have your personal information:

• erased
• rectified or amended
• completed

Changes to this Privacy Statement

We will occasionally update this Privacy Statement to reflect new legislation or industry practice, group company changes and customer feedback. We encourage you to review this Privacy Statement periodically to be informed of how we are protecting your personal data.