

DRFortress respects your privacy and is committed to maintaining the privacy and confidentiality of personal data we collect. The purpose of our Privacy Statement is to demonstrate our firm commitment to the privacy and protection of all persons who provide personal data to DRFortress and its affiliates. This Privacy Statement describes the ways we collect information from and about you, and what we do with the information, so that you may decide whether or not to provide information to us.

By visiting DRFortress websites or otherwise providing your personal information to DRFortress through any other means, you accept and consent to the practices described in this Privacy Statement.

For purposes of this Privacy Statement, the term "visitor" includes visitors to our websites who are not yet customers, those who become customers, as well as those who do not become customers; whether you upload information to our websites, download it, or are merely viewing our websites. You can choose not to provide certain information when using our websites but this may result in you not being able to take advantage of many of its features.

#### 1. What do we collect and where?

The information we collect may include your personal information, such as your name, contact information, financial account numbers, IP addresses, Live Chat Messages, Telephone conversations, product and service selections and orders or other things that identify you individually.

Generally, we may collect information about you in the following manners:

- you may provide your personal information to us via chat, email or other written or electronic correspondence, telephone calls, web based forms, or other means;
- we use automated technical means to collect information about all website visitors (for example, using cookies);
- via third party providers

#### Web Visit

You may visit our Websites in any of the following ways:

- By using your browser to navigate to our Websites including, but not limited to, drfcloud.com and drfortress.com and their sub-domains.
- By viewing an advertisement displayed on a third party website that is served content by our web server;
- By viewing an email that is served content by our or a third party web server.

When you visit our Website, our server logs your IP address (unique network addresses), the time and duration of your visit, and the time and duration of the pages on our website you view. If you arrive at our website by clicking a paid advertisement (including a paid search engine result) or a link in an email, then we will capture information that tracks your visit from that link. If you arrive at our Website by

clicking a non-paid source, such as link in a non-paid search engine result or an unsponsored link on another website, we may capture information that tracks your visit from that source, to the extent we are able to do so. We may also capture information about your computer system, such as your browser type and operating system.

We will likely place a cookie on your hard drive during the web visit. A cookie is a unique alphanumeric identifier that we use to help us identify the number of unique visitors to our Website, whether or not those visitors are repeat visitors, and the source of the visits. Cookies cannot be executed as code or used to deliver a virus. Other servers cannot read them and personal information cannot be gathered from them. They are simply an identifier shared between you and us to allow us to improve the services we offer to you through our Website. If you do not wish cookies to be placed on your computer, then they can be disabled in your web browser. The option to do so is normally found in your browser's "security settings" section. However, please note, permanently disabling cookies in your browser may hinder your use of our Website as well as other websites and interactive services.

We reserve the right to use a web beacon, also known as a web bug, which is a small graphic (usually 1 pixel x 1 pixel), that is embedded in a web advertisement, email, or page on our web site, but is invisible to you. When you view a page on our web site, an email or an advertisement your web browser will request the web beacon from a web server, which in turn will set a cookie in your web browser containing a unique identifier. This unique identifier will be linked to log information that is used to track your movements on our web site in order to determine the effectiveness of content and advertising campaigns.

We do not collect personal information about you as part of a web visit, but web visit information may be tied to other information (including personal information) we collect from you via chat, web forms, and the other means we describe in this Privacy Statement.

Our service providers may also use web beacons, cookies, and other means to track your activity on our website. Our service providers maintain their own privacy policies, and you should also review those as they are not covered by this Privacy Statement.

#### Links to non-DRFortress Websites

We may provide links to third-party websites for your convenience and information. The privacy practices of those sites may differ from DRFortress practices and are not controlled by DRFortress and are not covered by this Privacy Statement. We do not make any representations about third-party websites. We encourage you to review their privacy policies before submitting your personal data.

#### Sensitive Information

We will not intentionally collect or maintain, and do not want you to provide, any information regarding your medical or health condition, race or ethnic origin, political opinions, religious or philosophical beliefs or other sensitive information.

#### Children's Online Privacy Protection

Our services are not designed for or directed to children under the age of 13, and we will not intentionally collect or maintain information about anyone under the age of 13.

## 2. What do we use this information for?

### Personal Information

We may use your information to process your service requests, handle orders, deliver products and services, process payments, communicate with you about orders, provide access to secure areas of the Website, recommend merchandise and services that might be of interest to you, to personalize your visit to our Website, and to enable us to review develop and continually improve the products services and offers we provide online. We also use this information to prevent or detect fraud or abuses of our Website and to enable third parties to carry out technical, logistical or other functions on our behalf.

### Contact Information

We use visitor information to send information about our company to visitors and to get in touch with them when necessary. We also use the information we collect to improve the content of our websites and as training aides for our employees. Visitors are given the choice at the point when we request their information.

### Financial Information and payment card details

We may ask visitors to enter credit card or account information in order to process orders for services placed with DRFortress or its affiliates. Financial information provided via our website or via the DRFortress portal is transferred over a secure connection. We collect this information on a transaction-by-transaction basis and will not authorize the release of the information with anyone not directly involved in processing the transaction. This information may be encrypted and stored for logging purposes in accordance with applicable regulatory requirements.

Credit card numbers are used only for processing payments and are not used for any other purposes. When we use third party service providers for credit card processing services we will enter into a written agreement with such third party ensuring appropriate security and confidentiality measures are in place in safeguarding your personal data.

We use web visit information to measure interest in and develop our web pages and marketing plans, customize the content you view on your web visits based on your activity on past visits, and administer our Website.

- We may use the visitors' IP address to help diagnose problems with our servers, and to administer our Websites.
- We may use cookies to help us recognize visitors as unique visitors (just a number) when they return to our websites. For example, if there are 1,000 visits to our website on a certain day, we can use cookies to discover how many of those visits were made via the same browser (same visitor). We may

also use the cookie to discover whether a certain visitor has visited our site more than once, and the source for each visit. We also use cookies to: allow us to tailor content or advertisements to match your preferred interest; avoid showing visitors the same advertisements repeatedly; compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our Website (we cannot identify visitors personally in this way); count the number of anonymous users of our sites.

- When electing to use them, we use web beacons to count the number of times that our advertisements and web-based email content are viewed. We combine web beacon information with cookies to track activity on our website originating from advertisements and web-based email content.

We use information you provide to us via telephone calls, chat, email, web forms and other communications to correspond with you about services you may be interested in purchasing. If you elect to purchase a service online using a web form, we will use the information to establish your account. Information you submit in writing, such as chat, email, and web form information may be archived and may be tied to information that we collect about your web visits. Your telephone call may be recorded for training purposes and we may enter information you provide via telephone into our systems to use for the purposes described in this paragraph.

### 3. Disclosure of Personal Information

Personal information we gather is for internal use only and we will not authorize the release of this information to anyone outside DRFortress (except to third party service providers to DRFortress who perform functions on our behalf but in such event personal information will only be shared to the extent reasonably necessary to perform their functions.

Should you breach our terms and conditions or website terms, or if we are under a duty to disclose or share your personal data in order to comply with a legal obligation, we may disclose your information to a relevant authority without notification to you. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. In particular, we may release the information we collect to third parties when we believe it is appropriate to comply with the law, to enforce our legal rights, to protect the rights and safety of others, or to assist with industry efforts to control fraud, spam or other undesirable conduct.

We may release the information we collect to third parties, where the information is provided to enable such third party to provide services to us, provided that the third party has agreed to use at least the same level of privacy protections described in this Privacy Statement, and is permitted to use the information only for the purpose of providing services to us.

### 4. Opting out of communications

DRFortress provides you an opportunity to opt-out of personal data being disclosed to third parties (except for meeting applicable legal requirements, required for the provision of services, or permitting third party service providers who perform functions on our behalf as described in section 3 of this

Privacy Statement), including your opting out of receiving future marketing mailings. We will not use your contact information to correspond with you about our services if you ask us not to. Please send your request to [info@drfortress.com](mailto:info@drfortress.com) or write us at Legal Department, DR Fortress, LLC, 3375 Koapaka St, Ste D198, Honolulu, HI 96819, return receipt requested. Please note that it may take up to ten days to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request.

#### 5. Security of your information

DRFortress is committed to industry best practices approaches concerning security measures to prevent the loss, misuse and alteration of the information in our possession. We use various security measures to protect the information we collect, as appropriate to the type of information, including encryption, firewalls, and access controls. We store information you provide to us on a computer system located in a controlled facility with a limited access. Visitor textual information is encrypted during transmission, our company databases are accessible only by DRFortress employees, contractors and agents on a need to know basis and who have entered into and are bound by a confidentiality and nondisclosure agreement with DRFortress.

#### 6. Data Integrity

Personal data we collect is relevant for the purposes for which it is to be used. DRFortress takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

#### 7. Right to access your personal information

If you believe that any personal information we have about you is incorrect, or is, has been, or might be used inappropriately, please contact us immediately at [info@drfortress.com](mailto:info@drfortress.com), and we will take steps to correct or delete the information, or restrict its use, as set forth above upon reasonable verification of identity.

#### 8. Verification

DRFortress utilizes the self-assessment approach to assure its compliance with its Privacy Statement. DRFortress regularly verifies that the privacy statement is accurate, comprehensive, prominently displayed, completely implemented and in conformity with the Safe Harbor Principles and conducts its self-assessment on an annual basis to ensure that all relevant privacy practices are being followed. Appropriate employee training is in place and internal procedures for periodically conducting objective reviews of compliance are in place. A statement verifying this self-assessment is completed by a corporate officer or other authorized representative annually.

#### 9. Inquiries or complaints

If you have a question or complaint about this Privacy Statement or our information collection practices, please contact us at [info@drfortress.com](mailto:info@drfortress.com) or write us at DR Fortress, LLC, attn: information, 3375

Koapaka St, Ste D198, Honolulu, HI 96819. We will investigate the matter and are committed to resolve any reasonable and legitimate privacy concerns.

#### 10. Changes

Our business changes constantly and our Privacy Statement may also change from time to time. You should check our website frequently to see recent changes, however, we will never materially change our policies and practices to make them less protective of personal information collected in the past without providing significant advanced and conspicuous warning. This Privacy Policy was last updated on July 16, 2014.