

## **Privacy Policy**

Countable Web Productions (“Countable”, “we” or “us”) operates the website comment solution services (“the Program”) on the [www.htmlcommentbox.com](http://www.htmlcommentbox.com) website (the “Site”) (the Program and Site collectively referred the “Services”). This Privacy Policy applies to all users of our Services.

Countable acts in accordance with the principles of Fair Information Practice. If you have any questions about this Privacy Policy, please contact us.

### **1. Collection of Personal Information**

1.1 Countable collects your Personal Information to provide you with the best service possible.

“Personal Information” may include your name, age, home address, phone number, email address.

We may collect your Personal Information from any data you input into our Site, or any information you send us via correspondence such as telephone, email, mail, fax or directly through our Site.

1.2 We will only collect Personal Information in order to:

- (a) verify identity;
- (b) identify your preferences;
- (c) open and manage an account;
- (d) ensure you receive a high standard of service;
- (e) meet regulatory requirements; or
- (f) any other legal reasons as applied to your use of the Services.

### **2. Use, Disclosure and Consent**

2.1 We will not use or disclose your Personal Information to anyone except as described in this Privacy Policy.

2.2 Except as specified below, we will obtain your express or implied consent to collect, use or disclose your Personal Information. You can provide consent orally, in writing, electronically or through an authorized representative.

2.3 You provide us with implied consent where our purpose for collecting, using or disclosing your Personal Information would be considered obvious or reasonable in the circumstances. Your consent may also be implied where you have received notice and a reasonable opportunity to opt-out of having your Personal Information used, and you have not provided us with notice of your opting-out, including but not limited to use for mail-outs, marketing or fundraising.

2.4 We may collect, use or disclose your Personal Information without your consent in the following circumstances:

- (a) when permitted or required by law;
- (b) in an emergency that threatens an individual's life, health, or personal security;
- (c) when the Personal Information is available from a public source;

- (d) when we require legal advice from a lawyer;
- (e) for the purposes of collecting a debt or protection from fraud; or
- (f) other legally established reasons.

2.5 We will not sell your Personal Information to other parties without your explicit or implied consent. We retain your Personal Information for the time necessary to fulfill the identified purposes or a legal or business purpose.

### **3. Accuracy and Security**

3.1 We will make reasonable efforts to ensure that your Personal Information is accurate and complete. You may request a correction to your Personal Information. All requests must be in writing and provide sufficient detail to identify your Personal Information and the correction requested.

3.2 We are committed to ensuring the security of your Personal Information and may use passwords, encryption, firewalls, restricted employee access or other methods, in our discretion. We will use appropriate security measures when destroying your Personal Information such as shredding documents or deleting electronically stored information, in our discretion.

3.3 While we strive to use commercially acceptable means to protect your personal information, you acknowledge and agree that no method of transmission over the Internet, or method of electronic storage is 100% secure. We make no guarantee as to the absolute security of your Personal Information.

### **4. Log Data**

4.1 We may collect information that your web browser sends whenever you visit our Site, including but not limited to your computer's Internet Protocol address ("IP"), your browser type and version, the pages of our Website that you frequent, or other such statistics ("Log Data"). We may use third party services that collect, monitor and analyze Log Data to increase our Website's functionality and in turn offer more effective service to you. The third party service providers may have their own privacy policies addressing how they use such information.

### **5. Cookies**

5.1 We may use cookies to collect information. You may instruct your browser to refuse all cookies or to indicate when a cookie is being sent. If you do not accept cookies, you may not be able to use or access certain pages or services of our Site. If you do not instruct your browser to refuse all cookies or to indicate when a cookie is being sent, your consent to our use of your personal information may be implied.

### **6. Service Providers**

6.1 We may employ third party companies and individuals to perform Site-related services on our behalf, or to assist us in analyzing our Site's use. Such third party companies may have access to

your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **7. Links to Other Sites**

7.1 Our Site may contain links to other sites that are not operated by Countable or its subsidiaries or affiliates. We strongly advise you to review the privacy policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **8. Children's Privacy**

8.1 If you are a parent or guardian and you are aware that your minor child has provided us with personal information, please contact us. If we become aware that we have collected personal information from minors without verification of parental consent, we take steps to remove that information from our servers.

## **9. Changes to this Privacy Policy**

9.1 We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

9.2 If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Site.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us.