

# Celtic-Link Privacy Policy

*October 1, 2016*

## Introduction

This privacy policy ("Privacy Policy") is designed to assist you in understanding the information that Celtic Capital Corporation ("Celtic", "we", "our", or "us") collects on our clients.celticapital.com extranet site (the "Extranet Site"). Your use of the Extranet Site indicates to us that you have read and accepted our privacy practices as outlined in this Privacy Policy. This Privacy Policy is effective as of the date in the subtitle above.

## Scope of This Privacy Policy

This Privacy Policy only covers information collected on this Extranet Site. This Privacy Policy does not cover any information collected at any other web site provided by us or any information collected by any third party web sites linked to this Extranet Site.

Access to this Extranet Site is permitted only to authorized adults (18 years of age or older) working on behalf of Celtic or our current clients. This Privacy Policy does not cover any information collected from unauthorized, unlawful, or malicious use of the Extranet Site.

This Privacy Policy covers personally identifiable information, such as your name, title, occupation, address, telephone number, or e-mail address ("PII") that can be used to identify or locate you as an individual.

The purpose of the Extranet Site is to exchange business information between Celtic and our clients. Business information includes, but is not limited to, financial statements and other accounting reports, loan and collateral balances, customer lists, and copies of sales and shipping documents. Unless it contains PII, such business information is not covered by this Privacy Policy, and it is handled in the same manner as such information transmitted between us via any other medium.

## Information Collected

To use the Extranet Site, you must log in with unique credentials. These login credentials, when combined with other information we possess, can be used to determine your name and other PII. In addition, documents that you upload via the Extranet Site may contain your PII.

When you visit, interact or download information from the Extranet Site, our web servers may automatically collect web site usage information. Web site usage information is non-personally identifiable information ("non-PII") that describes how our visitors use and navigate this Extranet Site. Web site usage information may include, without limitation, the number and frequency of visitors to each web page, the length of stay on each web page, browser type, the preceding and subsequent page viewed, and an Internet Protocol ("IP") address.

An IP address is a number that is automatically assigned to your computer or network when you are on the internet. When you request pages from the Extranet Site, our servers log your IP address. Celtic may use IP addresses for a number of purposes, including, without limitation, system administration, and audits of our Extranet Site. We may also use IP addresses in cooperation with internet service providers or law enforcement agencies to identify users if we deem it necessary to comply with the law, to enforce compliance with this Privacy Policy, or to protect the Extranet Site or its users and visitors.

Web site usage information may be used by us to determine the applicable technology available in order to serve the visitor the most appropriate version of a web page. In addition, web site usage information may be used by us to determine how visitors arrive at the Extranet Site and what type of content is most accessed.

We may also collect a unique identifier for the particular device you use to access the internet (the "Device Identifier"). A Device Identifier is a number that is automatically assigned to your computer, cell phone, or other device used to access the internet. Our computers identify your device by its Device Identifier. We may associate your Device Identifier with other information you provide.

We and our third-party service providers may use a variety of technologies that automatically collect information when you use this Extranet Site. The methods that may be used to collect this information include the following:

- *Cookies.* A cookie is a data file placed on a computer when it is used to visit this Extranet Site. Cookies may be used for many purposes, including, without limitation, tracking user preferences and web pages visited while using this Extranet Site. You may disable cookies using your browser's preferences, but this Extranet Site may not function properly if you disable cookies.
- *Web Beacons.* A web beacon is a small graphic image or other web programming code (also known as "1×1 GIFs" or "clear GIFs") that may be included in our Extranet Site pages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to serve users with relevant content at the Extranet Site, count Extranet Site visitors, and/or to monitor Extranet Site traffic patterns.
- *Embedded Scripts.* An embedded script is programming code that is designed to collect information about your interactions with this Extranet Site, such as which links you click on. The code is temporarily downloaded onto your computer from our web server or third party provider, is active only while you are connected to the Extranet Site, and is deactivated or deleted thereafter.
- *Mobile Device Identifiers.* Mobile device identifiers are certain mobile service providers which uniquely identify mobile devices. We or our third-party providers may receive such device information if you access the Extranet Site through mobile devices. Additionally, some mobile phone service providers operate systems that pinpoint the physical location of devices that use their services. Depending on the provider, we or our third-party service providers may receive this information.

Information collected through such means may be non-identifying or may be associated with you. In the latter case, it will be treated as PII.

## Use of Information Collected

Celtic does not share PII collected through the Extranet Site with third parties except as set forth in this Privacy Policy. Celtic may use the PII we collect from you on the Extranet Site or from e-mails you send directly to us as follows:

- To respond to your inquiries, comments, questions or requests, or in the ordinary course of doing business with you;
- To monitor and statistically analyze usage of the Extranet Site and to improve the Extranet Site;

- To administer the Extranet Site's systems, to audit the Extranet Site, and for other internal business purposes;
- To customize the content that you see;
- To contact you about the Extranet Site, including, without limitation, to notify you in our discretion of changes to this Privacy Policy or other policies that affect your use of the Extranet Site;
- To verify and monitor compliance with the Privacy Policy;
- To comply with a judicial, administrative or similar proceeding or order such as a subpoena, search warrant, discovery request or other valid law enforcement measure or investigation;
- To protect the legal rights, interests and safety of the Extranet Site, our users or others in cooperation with copyright owners, internet service providers, wireless service providers and law enforcement agencies;
- When we employ third parties to perform functions or services on our behalf, including, without limitation, third party hosting companies, communication services, and data analysts;
- To share with and among our affiliates or in the event there is any transfer, sale, or assignment of any of our business and/or assets or in the event of any other corporate change.

Celtic may provide third parties with non-PII information such as aggregate information regarding users of the Extranet Site, demographic information, the number of unique page requests, unique users of our Extranet Site, and aggregate information on the types of activities users conducted while on the Extranet Site.

## **Our Commitment to Security**

Your privacy is important to us. Celtic uses reasonable efforts and safeguards to protect the PII we collect on this Extranet Site from unauthorized access, use, modification or disclosure. However, due to the design of the internet and other factors outside of our control, we cannot guarantee that PII will be protected in all situations and circumstances. All information you transmit to Celtic via the Extranet Site is at your own risk.

## **Consent to Transfer**

This Extranet Site is operated in the United States. If you are located in Canada, the European Union, or elsewhere outside the United States, please be aware that any information you provide to us will be transferred to the United States. By using the Extranet Site or by providing us with your information, you consent to this transfer.

## **Updating Your PII and Contacting Celtic**

You can contact Celtic directly in order to update or correct the PII that we store about you. See the "Contact Us" page on the Extranet Site for information on how to contact us.

## Acceptance and Privacy Policy Changes

By using this Extranet Site, you accept our privacy practices as outlined in this Privacy Policy. Celtic reserves the right to modify, revise, or otherwise update this Privacy Policy at any time for any reason. We will post any new or revised policies on the Extranet Site so that it always contains the current policy. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE EXIT THIS EXTRANET SITE AND DO NOT ACCESS IT IN THE FUTURE.