

# **Privacy Policy**

# **Overview**

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used by TPC. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website or our services.



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#### Personal Information Collection

# What personal information do we collect from the people that visit our blog, website or utilize our services?

When visiting or requesting information on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, or other details to help you with your experience. If we are providing services, additional information such as user name, passwords and VPN credentials may be collected as well.

#### When do we collect information?

We collect information from you when you enter information on our site or we enter into a services contract with you.

#### How do we use your information?

We may use the information we collect from you when you register, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To contact you in response to your request for more information
- To provide consulting services

#### How do we protect your information?

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted in transport and at rest for data we directly handle.

In providing our suite of services it may be necessary for some customer data, which may contain PII to reside in services provided by Google, Atlassian, Slack, Dropbox and Microsoft's Skype for Business. Their respective privacy policies would apply in those cases.



#### Cookies

#### Do we use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

#### We use cookies to:

- Understand and save user's preferences for future visits.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, it won't affect the user's experience.



# **Third-Party**

#### Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information. The only exception to this is storing of data on the 3<sup>rd</sup> party services noted above that are used in the discharge of services we are contractually obligated to provide.

#### Third-party links

We do not include or offer third-party products or services on our website.

#### Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

https://support.google.com/adwordspolicy/answer/1316548?hl=en

#### We have implemented the following:

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

#### **Opting out:**

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.



# **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. - See more at: http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf

#### According to CalOPPA, we agree to the following:

Users can visit our site anonymously.

Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.

Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.

You will be notified of any Privacy Policy changes:

On our Privacy Policy Page

Can change your personal information:

By emailing us

# **Tracking**

#### How does our site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

#### Does our site allow third-party behavioral tracking?

It's also important to note that we allow third-party behavioral tracking.

### COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years old.



#### **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach be discovered:

We will notify you via email

• Within the most expedient time and without unreasonable delay unless specific state law requires otherwise



#### **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

## We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Send you additional information related to your contracted service
- Market to our mailing list or continue to send emails to our clients after the original engagement has occurred.
- Communicate with you while providing services.

#### To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

#### If at any time you would like to unsubscribe from receiving future emails:

• Follow the instructions at the bottom of each email and we will promptly remove you from **ALL** correspondence.



# **Contact Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

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