

Privacy Policy (Safe Harbor)

This document was last updated January 26th, 2009.

Scope:

Decipher Inc (the Company) has developed the following privacy policy to protect individually identifiable information. This policy covers *Decipher Inc* and applies to all individually identifiable information that *Decipher Inc* obtains when a client uses an *Decipher Inc* service, including survey programming, data collection, data processing and reporting.

Decipher Inc protects individually identifiable information as follows:

Disclosure:

Decipher Inc will not sell, trade, or disclose to third parties any individually (either client or *Decipher Inc* employee) identifiable information, derived from the use of any *Decipher Inc* service, (except as required by subpoena, search warrant or other legal process or in the case of imminent physical harm to the customer or others). When *Decipher Inc* uses other agents, contractors or companies to perform services on its behalf, *Decipher Inc* will ensure that the company protects the individually identifiable information consistent with this policy

Security:

Decipher Inc has implemented technology and security features and strict policy guidelines to safeguard the privacy of identifiable information from unauthorized access or improper use, and we will continue to enhance our security procedures as new technology becomes available.

E-Mail Contents:

The Company will not read or disclose to third parties private e-mail communications that are sent or received as part of using *Decipher Inc* services, except as required to operate the service or as otherwise authorized by law.

Survey Collected Data:

The Company will not disclose to third parties, any data collected from respondents to surveys hosted by the company, except as required to provide the service or as otherwise authorized by law.

Improper Conduct:

Decipher Inc may use individually identifiable information to investigate and help prevent potentially unlawful activity or activity that threatens the network or otherwise violates the customer agreement for that service.

Account Information:

Decipher Inc honors requests from clients for changes in account information, such as name and password and will correct any such information that is inaccurate.

Safe Harbor:

The United State Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (FAQ) to enable U.S. companies to satisfy European Union (EU) law requirements for adequate protection of personal information transferred from the EEA to the United States. *Decipher Inc Inc.* adheres to the Safe Harbor Principles outlined below.

Privacy Principles:

The privacy principles in this policy are based on the Safe Harbor Principles.

Notice and Choice:

Decipher Inc Inc. may collect personal information directly from individuals in the EU, as part of conducting surveys for the company's clients. This information is freely given by survey respondents and as far as is reasonably practicable, the information remains anonymous when it is reported. Personal information may exist in survey information that is provided to *Decipher Inc Inc.*, from an EEA organization for processing. To the extent permitted in the Safe Harbor Agreement, we reserve the right

to process personal information in the course of providing survey data collection and hosting services to our clients with or without the knowledge of individuals involved.

Onward Transfers and Disclosures to Agents:

Decipher Inc Inc. will not knowingly disclose an individual's personal information to third parties, except when one or more of the following conditions is true:

- We have the individual's permission to make the disclosure.
- The disclosure is required by law or professional standards.
- The information in question is publicly available.
- The disclosure is reasonably necessary for the establishment or defense of legal claims.

Data Security:

Decipher Inc takes data security seriously and has put in place appropriate physical, electronic, and procedures to safeguard and secure the information we process.

Data Integrity:

Decipher Inc will use personal information only in ways that are compatible with the purposes for which it was collected, which is in the confines of survey data collection and reporting.

Access:

Upon request, Decipher Inc will grant individuals reasonable access to personal information that it holds about them. In addition, Decipher Inc will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

Enforcement:

Decipher Inc Inc. utilizes the self-assessment approach to assure its compliance with our privacy statement. Decipher Inc Inc. periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and in conformity with the Safe Harbor Principles

Changes in Practices: *Decipher Inc* will keep this policy current and will inform you of any changes that we make.

Contact Information

Decipher Inc welcomes your comments regarding this privacy statement; please contact us at:

Decipher Inc

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