



AltoChange Privacy Policy

This Privacy Policy provides our policies and procedures for collecting, using, and disclosing your information. Users can access the AltoChange service (the “**Service**”) through our website www.AltoChange.com, applications on Devices, through APIs, and through third-parties. A “**Device**” is any computer used to access the AltoChange Service, including without limitation a desktop, laptop, mobile phone, tablet, or other consumer electronic device. This Privacy Policy governs your access of the AltoChange Service, regardless of how you access it, and by using our Services you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy. All of the different forms of data, content, and information described below are collectively referred to as “information.”

1. The Information We Collect And Store

We may collect and store the following information when running the AltoChange Service:

Information You Provide. When you register an account, we collect some personal information, such as your name, phone number, credit card or other billing information, email address and home and business postal addresses. You may also ask us to import your contacts by giving us access to your third party services (for example, your email account) or to use your social networking information if you give us access to your account on social network connection services. When you invite others to join AltoChange by using our referral page, we send them a one-time email for that referral. You may also provide us with your contacts’ email addresses when sharing projects, sub-projects, actions, phases, to do lists, various reports, use of any sections of the online application, folders or files with them. We may also receive Personal Information (for example, your email address) through other users, for example if they have tried to share something with you or tried to refer AltoChange to you.

Files. We collect and store the files you upload, download, or access with the AltoChange Service (“**Files**”). If you add a file to your AltoChange that has been previously uploaded by you or another user, we may associate all or a portion of the previous file with your account rather than storing a duplicate.

Log Data. When you use the Service, we automatically record information from your Device, its software, and your activity using the Services. This may include the Device’s Internet Protocol (“IP”) address, browser type, the web page visited before you came to our website, information you search for on our website, locale preferences, identification numbers associated with your Devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata concerning your Files, and other interactions with the Service.

Cookies. We also use “cookies” to collect information and improve our Services. A cookie is a small data file that we transfer to your Device. We may use “persistent cookies” to save your registration ID and login password for future logins to the Service. We may use “session ID cookies” to enable certain features of the Service, to better understand how you interact with the Service and to monitor aggregate usage and web traffic routing on the Service. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of the Service.

2. How We Use Personal Information

Personal Information. In the course of using the Service, we may collect personal information that can be used to contact or identify you (“**Personal Information**”). Personal Information is or may be used: (i) to provide and improve our Service, (ii) to administer your use of the Service, (iii) to better understand your needs and interests, (iv) to personalize and improve your experience, and (v) to

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provide or offer software updates and product announcements. If you no longer wish to receive communications from us, please follow the “unsubscribe” or “cancel account” instructions provided in any of those communications, or update your account settings information, or contact your project manager, or contact AltoChange.com support whichever is appropriate to your account type and your account configuration.

Geo-Location Information. Some Devices allow applications to access real-time location-based information (for example, GPS). Our mobile apps may collect such information from your mobile device at any time while you download or use our mobile apps as of the date this policy went into effect and may do so in the future to improve our Services and provide extra information and improve the data managed by AltoChange.com. Some photos and videos you place in AltoChange may contain recorded location information. We may use this information to optimize your experience. If you do not wish to share files embedded with your geo-location information with us, please do not upload them. If you don’t want to store location data in your photos or videos, please consult the documentation for your camera to turn off that feature. Also, some of the information we collect from a Device, for example IP address, can sometimes be used to approximate a Device’s location and be used by the project manager or your colleagues to better use the features in AltoChange.com and get enriched information about the data uploaded to AltoChange.com. In doubt, please contact your project manager, your company manager or AltoChange.com support.

Analytics. We also collect some information (ourselves or using third party services) using logging and cookies, such as IP address, which can sometimes be correlated with Personal Information. We use this information for the above purposes and to monitor and analyze use of the Service, for the Service’s technical administration, to increase our Service’s functionality and user-friendliness, and to verify users have the authorization needed for the Service to process their requests. As of the date this policy went into effect, we may use Google Analytics. To learn more about the privacy policy of Google Analytics, please visit <http://www.google.com/intl/en/policies/>

3. Information Sharing and Disclosure

Your Use. We will display your Personal Information in your profile page and elsewhere on the Service according to the preferences you set in your account. Any information you choose to provide or your project manager choose to provide should reflect how much you want others to know about you. Please consider carefully what information you or is disclosed in your profile page and your desired level of anonymity or presence. You can review and revise your profile information at any time. We do not sell your personal information to third parties. We may also share or disclose your information with your consent, for example if you use a third party application to access your account (see below). Through certain features of the Service, you may also have the ability to make some of your information public. Public information may be broadly and quickly disseminated.

Service Providers, Business Partners and Others. We may use certain trusted third party companies and individuals to help us provide, analyze, and improve the Service (including but not limited to data storage, maintenance services, database management, web analytics, payment processing, and improvement of the Service’s features). These third parties may have access to your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy.

Third-Party Applications. We may share your information with a third party application with your consent when you choose to access our Services through such an application. We are not responsible for what those parties do with your information, so you should make sure you trust the application and that it has a privacy policy acceptable to you.

This E-mail / letter is confidential and may also be privileged. If you are not the intended recipient, please notify us immediately. You should not copy it or use it for any other purpose, nor disclose its contents to any other person. All our transactions and correspondence are subject our general terms and conditions. Copy available on request.

Compliance with Laws and Law Enforcement Requests; Protection of AltoChange's Rights. We may disclose to parties outside AltoChange files stored in your AltoChange and information about you that we collect when we have a good faith belief that disclosure is reasonably necessary to (a) comply with a law, regulation or compulsory legal request; (b) protect the safety of any person from death or serious bodily injury; (c) prevent fraud or abuse of AltoChange or its users; or (d) to protect AltoChange's property rights. If we provide your AltoChange files to a law enforcement agency as set forth above, we will remove AltoChange's encryption from the files before providing them to law enforcement. However, AltoChange will not be able to decrypt any files that you encrypted prior to storing them on AltoChange.

Business Transfers. If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our website) of any change in control or use of your Personal Information or Files, or if either become subject to a different Privacy Policy. We will also notify you of choices you may have regarding the information.

Non-private or Non-Personal Information. We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our Service.

4. Changing or Deleting Your Information

If you are a registered user, you may review, update, correct or delete the Personal Information provided in your registration or account profile by changing your "account settings." If your personally identifiable information changes, or if you no longer desire our service, you may update or delete it by making the change on your account settings. In some cases we may retain copies of your information if required by law. For questions about your Personal Information on our Service, please contact support@AltoChange.com. We will respond to your inquiry within 30 days.

5. Data Retention

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, you may delete your account. We may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Consistent with these requirements, we will try to delete your information quickly upon request. Please note, however, that there might be latency in deleting information from our servers and backed-up versions might exist after deletion. In addition, we do not delete from our servers files that you have in common with other users.

6. AltoChange in Business Use

If you have an AltoChange project administrator he may be able to:

- access information in and about your AltoChange account;
- disclose, restrict, or access information that you have provided or that is made available to you when using your AltoChange account; and
- control how your AltoChange account may be accessed or deleted.

Please refer to your organization's policies if you have questions about your Administrator's rights.

7. AltoChange Community

Our Service offers publicly accessible community services such as blogs, forums, and wikis. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. Your posts may remain even after you cancel your account. For questions about your Personal Information on our Service, please contact support@AltoChange.com.

This E-mail / letter is confidential and may also be privileged. If you are not the intended recipient, please notify us immediately. You should not copy it or use it for any other purpose, nor disclose its contents to any other person. All our transactions and correspondence are subject our general terms and conditions. Copy available on request.

Our Site may include links to other Web sites whose privacy practices may differ from those of AltoChange. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any Web site you visit.

8. Security

The security of your information is important to us. When you enter sensitive information (such as project files, reports, lists, production data, photos etc.) on our site pages and uploaded folders, we encrypt the transmission of that information using secure socket layer technology (SSL).

We follow generally accepted standards to protect the information submitted to us, both during transmission and once we receive it. No method of electronic transmission or storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our website, you can view our Security Overview information below or contact us at support@AltoChange.com.

9. Our Policy Toward Children

Our Services are for business use and are not directed to persons under 13. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at support@AltoChange.com. If we become aware that a child under 13 has provided us with Personal Information, we will take steps to delete such information from our files.

10. Contacting Us

If you have any questions about this Privacy Policy, please contact us at support@AltoChange.com or a KORENA SPRL, Square Emile des Grées du Loû 5B, B-1190 Forest, Belgium

11. Changes to our Privacy Policy

This Privacy Policy may change from time to time. If we make a change to this privacy policy that we believe materially reduces your rights, we will provide you with notice (for example, by email). And we may provide notice of changes in other circumstances as well. By continuing to use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

This E-mail / letter is confidential and may also be privileged. If you are not the intended recipient, please notify us immediately. You should not copy it or use it for any other purpose, nor disclose its contents to any other person. All our transactions and correspondence are subject our general terms and conditions. Copy available on request.