



## SECURITY PROVISIONS FOR DECISIONDIRECTOR

Advantiv is committed to the security and integrity of Subscriber information within DecisionDirector. Advantiv uses industry best-practice security measures to protect against the loss, misuse or alteration of the information under our control.

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect within DecisionDirector. These measures include the following:

- Multiple level firewalls to segregate and secure network segments based on system roles.
- Data transmissions are encrypted using SSL technology
- Use of server-side and client-side digital certificates
- Role-based administrative access policies and procedures
- Co-location facility uses cipher-encoded access badges, and 24hour video surveillance and guards to control access
- Comprehensive in-house performance and security monitoring and auditing
- Intrusion detection and analysis
- Detailed security policy, processes and procedures

To provide for the availability of service and information within DecisionDirector, Advantiv implements the following components:

- A disaster recovery plan and annual testing
- Backup procedures and secure off-site storage
- High availability database servers
- Redundant systems, power supplies, and network connections
- Service level agreements with service providers to guarantee service levels including availability
- Comprehensive change management and testing policies

## ADVANTIV DATA POLICY AND PRIVACY STATEMENT

This document describes Advantiv's policy for handling, processing, storing, and otherwise treating business and other data of Advantiv Subscribers. Advantiv Subscribers may be referred to as "Subscriber" or "you" or throughout this document. Individual users of DecisionDirector (including employees of Subscriber organizations) collectively and individually may also be referred to as "you" and "your" throughout this document.

When using DecisionDirector, Advantiv collects information that you elect to enter into DecisionDirector (such as business requirements, descriptions of your technology environment, responses to requests for proposals, and user account information). This data is addressed below in two categories, **Business Data** (as defined below) and **Personal Information** (data that can identify an individual or that is associated with the identity of an individual).

### **Business Data Handling**

Advantiv assumes and understands the sensitive nature of the Business Data you or your organization may provide while using DecisionDirector. Business Data may include information you provide for review by others within your organization, or you provide for review and response by other organizations, as well as other information that you store within DecisionDirector. Business Data may include Personal Information addressed more specifically below. Business Data should NOT include any information such as account names and passwords for systems and assets belonging to you.

### **Business Data Use by Advantiv**

Advantiv will treat your Business Data as confidential information and will use it only to: facilitate operation of DecisionDirector and its related services, including as part of a Request for Proposal specifically approved by you to be accessed by vendors selected by You; enhance your use of DecisionDirector and its related web pages; perform internal tracking and product improvements; enable us to contact you.

### **Business Contact Information**

When a DecisionDirector environment is created for a Subscriber, Advantiv asks for name and contact information for an Account Administrator. The Account Administrator's information will be used by Advantiv to contact the Subscriber with notices, service offerings and DecisionDirector administration purposes. If you so choose, your organization may provide additional contacts. Depending on the visibility choices selected by you or your company, your user names, phone numbers, and email addresses and other profile information may be visible to other DecisionDirector users. For example, Subscribers using DecisionDirector may choose to have their contact information visible only to certain other Subscriber organizations, or to all, or to none at all.

You should submit only publicly available, business contact information. Individual contact information submitted to DecisionDirector should not include private home contact information. You agree not to enter sensitive government id numbers associated with individual persons (e.g. U.S. Social Security numbers) into DecisionDirector or to provide documents via DecisionDirector containing such identifiers. Individual names and personal information associated with an individual is addressed below as "Personal Information".

### **Personal Information Handling and Privacy**

#### **Personal Information**

"Personal Information" is a person's name and very limited information associated with his or her contact information such as email address and phone number as opposed to information associated with an organization. Personal Information may be requested when setting up individual DecisionDirector logins. Depending on the visibility choices selected by you, your user name, phone number, and email address and other profile information may be visible to other DecisionDirector users.

#### **Use of Personal Information by Advantiv**

Advantiv will treat your Personal Information as confidential information and will use it only to: facilitate operation of DecisionDirector and its related services; enhance your use of DecisionDirector and its related web pages; perform internal tracking and product improvements; enable us to contact you.

#### **Correcting Account Information (Exercising Your Right to Access Personal Information)**

You have a right to access and modify or remove your Personal Information, subject to constraints identified

below.

Advantiv may refuse to give access to DecisionDirector for legitimate reasons including delinquent payments on a Subscriber account, a legal dispute, or security concerns. If you are unable to correct, update, or delete your personal information due to the fact that you are no longer able to access DecisionDirector, you may contact the Advantiv Policy Manager at the address provided below.

#### **Disclosure by Advantiv to Third Parties**

Advantiv does not provide your Business Data or Personal Information to third parties, except as described elsewhere in this policy and in our contracts with our Subscribers, unless (1) you request or authorize it; (2) Advantiv is compelled to do so by a governmental authority, regulatory body, or under subpoena or similar governmental request or to establish or defend a legal claim; or (3) the third party is acting as our agent or sub-contractor in performing services (e.g. off-site backup storage).

#### **Consent**

By submitting Business Data or Personal Information to DecisionDirector, you are consenting to Advantiv's collection, processing, storage, and use of that information in accordance with this Data Policy.

#### **Transfer**

DecisionDirector is located in and operated from the United States. By submitting Business Data or Personal Information to DecisionDirector, you consent to having such data transferred to the United States.

#### **Data Retention**

Advantiv will retain Business Data and Personal Information in active databases for varying lengths of time depending upon the specific Subscriber agreement, type of data, and applicable law. Consistent with Advantiv's backup and storage procedures and due to the close integration of data with DecisionDirector, Business Data and Personal Information might be stored by Advantiv in backup logs and files for the duration necessary for legal requirements or the purposes described in this policy. However, Advantiv makes no commitment to indefinitely store such data. You will be able to access your Business Data and Personal Information for a certain period based on your Subscriber agreement. Advantiv will permanently delete submitted data in whole or in part upon specific Subscriber request.

#### **European Personal Data**

To the extent that any Subscriber Data comprises personal data (as defined in Directive 95/46/EC of the European Parliament and of the Council), as between You and Advantiv, You are the data controller and Advantiv is the data processor. You grant Advantiv authorization to view, store, copy, and delete or otherwise process any Subscriber Data as part of Advantiv's standard performance of the Services and You irrevocably consent and agree to the processing of such Subscriber Data by Advantiv for such purpose at or from geographic locations within or outside of the European Economic Area (including but not limited to the United States of America).

#### **Changes to this Policy**

From time to time Advantiv will need to make changes to this policy. Some of the changes will be in response to changes in applicable laws and regulations. In addition, as Advantiv adds new features and new services to DecisionDirector, Advantiv will continue to handle Business Data and Personal Information consistently with this policy, but some changes or clarifications may be required. You are encouraged to check this policy occasionally to stay informed of any changes in our policies and procedures regarding Business Data and Personal Information. For

substantial and material changes to the Data Policy, Advantiv will document the change to this Data Policy, note the date of the last update at the bottom of the policy, and send a notice to the administrative contacts on file with Advantiv for each Subscriber, and will use reasonable efforts to provide notification to all affected users and suggest that such users review the updated Data Policy.

**Questions**

If you have questions about this Data Policy, please send an e-mail to [Advantiv Policy Manager](#), or send written correspondence to Advantiv Policy Manager, Advantiv Solutions, 13835 N Tatum Blvd, Suite 9-409, Phoenix, AZ, 85032.