

# TAPA Communications Privacy Policy

## GENERAL

TAPA considers the privacy of its clients to be of utmost importance and works to protect it.

The purpose of this privacy policy is to inform you, as a visitor to our website

- \* what kinds of information we may gather about you
- \* how we may use that information
- \* whether we disclose it to anyone, and
- \* the choices you have regarding our use of, and your ability to correct, the information

TAPA requests that you read this Privacy Policy carefully.

TAPA's policies and procedures for handling customer information have been created with the understanding that Internet technologies are still evolving and that Internet business methods are continuing to evolve to meet the needs and opportunities of the changing technologies. As a result, TAPA's policies and procedures are subject to change.

## TYPES OF INFORMATION

In the course of serving its customers, TAPA acquires, stores and transmits customer communications and information that customers may regard as private or sensitive.

- \* Some of this information - such as the customer's name, address, telephone number, and credit card data - is provided to TAPA by its customers in order to establish service.

- \* Other information - such as the customer's account status, choice of services, and customer logs - is created and maintained by TAPA in the normal course of providing service.

- \* In addition, TAPA may store customers' electronic mail and other communications as a necessary incident to the transmission and delivery of those communications.

### *Personal Information*

- \* Any information that personally identifies you or allows us to contact you.

- \* It includes, without limitation, your full name, your e-mail address, your home address, or your telephone number.

- \* This information is ordinarily used to individualize your experience on our website, communicate separately with you, facilitate your movements throughout our website, and to be able to selectively send you communications that may be of interest to you, either electronically or otherwise.

\* Generally, you can visit our website without revealing any Personal Information about yourself.

\* The personal information collected from Customers during the registration process is used to manage each Customer's account (such as for billing purposes).

\* This information is not shared with third parties, unless specifically stated otherwise or in special circumstances.

### *Aggregate Information*

\* We collect certain Aggregate information, such as tracking the Internet address of the domains from which you visit our site and analyzing this data for trends and statistics, tracking your IP address (the number that is automatically assigned to your computer when you are using the Web), and tracking your browser type.

\* We use this Aggregate information to help diagnose problems with our servers, to administer our site, and to gather broad demographic information.

\* None of this information is connected with your Personal Information.

\* TAPA may also generate nonidentifying and aggregate profiles from personal information Members provide during registration (such as the total number, but not the names, of Customers).

### *Use of IP Addresses*

\* An IP address is a number that is automatically assigned to your computer whenever you're surfing the Internet.

\* Web servers automatically identify your computer by its IP address.

\* TAPA and/or its affiliates may collect IP addresses for the purposes of system administration, to report aggregated information to our advertisers, and to audit the use of our website.

\* When Customers request pages from our website, our servers log the requesting Customers' IP addresses.

\* We normally will not link IP addresses to anything personally identifiable, which means that Customers' sessions will be logged, but Customer identity remains anonymous to us.

\* We can and will use IP addresses to identify a Customer when we feel it is necessary to enforce compliance with our rules or terms of service or to protect our service, website, or any person, or where it is otherwise permitted by law.

### *Responses to E-Mail Inquiries*

When Visitors or Customers send e-mail inquiries to TAPA, the return e-mail address is used to answer the e-mail inquiry we receive. TAPA does not use the return e-mail address for any other purpose and does not share the return e-mail address with any third party.

### *Voluntary Customer Surveys*

- \* We may periodically conduct both business and individual customer surveys.
- \* We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of services we offer and how we provide them to you.
- \* Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party.
- \* Participation in our customer surveys is voluntary.

### *"Cookies" and How TAPA Uses Them*

- \* A "cookie" is a small data file that can be placed on your hard drive when you visit certain websites.
- \* TAPA may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and services we provide and to manage our telecommunications networks.
- \* These cookies do not enable third parties to access any of your customer information.
- \* Most browsers are initially set up to accept cookies. If you'd prefer, you can set yours to refuse cookies or to alert you when cookies are being sent. However, it is possible that some parts of the site will not function if you do so.
- \* Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

### *Links to Other Sites*

- \* TAPA is not responsible for the content or the privacy policies of websites to which it may link and our privacy policy does not apply to websites to which we may link.
- \* These other sites may send their own cookies to users, collect data, or solicit personal information. These other sites are not subject to the TAPA privacy policy and TAPA is not responsible for the privacy policies for these other sites, nor for the use of any information that these sites may collect.
- \* Please keep in mind that whenever you give out Information online (for example, via message boards or chat lines), that Information can be collected and used by people you don't know.
- \* While TAPA and its affiliates strive to protect their Customers' Information and privacy, we cannot guarantee the security of any Information you disclose online and so you disclose such Information at your own risk.

## DATA SECURITY

\* TAPA is committed to taking reasonable measures to protect your Personal Information from theft, misuse and alteration.

\* Although TAPA's security efforts are consistent with industry practices, complete privacy, confidentiality, and security are not yet possible over the Internet.

\* The Customer agrees that since the Internet is not a fully secure medium for the communication of information, and since privacy and confidentiality cannot be guaranteed, use of TAPA's services may cause the Customer's information to be accessed by, or disclosed to, other persons.

\* Therefore, the Customer agrees that TAPA shall not be responsible or liable for any damage that the Customer, or any other person, may suffer in connection with the communication of private, confidential, or sensitive information using TAPA's services.

\* While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining the Customer's information.

### *Use of Information*

\* TAPA does not make any client data available to third parties.

\* We do not sell lists, accept advertising, or generate any third-party revenue from the data that is generated on this site.

\* We do not share data from any client with other clients.

\* We take the information we receive from individuals responding to our Customer Surveys and combine (or aggregate) it with the responses of other TAPA customers to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you, and to develop new services and products.

\* This aggregated, non-personally identifying information may be shared with third parties.

\* However, TAPA may disclose personal information about Visitors or Members, or information regarding your use of the Services or websites accessible through our Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: to satisfy laws, such as the Electronic Communications Privacy Act, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our Acceptable Use Policy or other user policies; to operate the Services properly; or to protect TAPA and our Members.

\* TAPA may disclose or access account Information for administrative and other purposes that we deem necessary to maintain, service, and improve our products and services.

\* TAPA disclaims any intention to censor, edit or engage in ongoing review or

surveillance of communications stored on or transmitted through its facilities by customers or others. TAPA will, however, review, delete or block access to communications that may harm TAPA, its customers or third parties. The grounds on which TAPA may take such action include, but are not limited to, actual or potential violations of TAPA's Acceptable Use Policy.

### *Modifications*

- \* Customers may not opt out of receiving information from TAPA which is essential for maintaining or updating customers' accounts or system information.

- \* Customers may access and modify their personal information by using the Account Administration Control Panel if available as a service.

- \* Domain name Customers who have registered a domain name with TAPA and wish to change the Technical Contact from TAPA to another company, may send a request to TAPA. It is important to note that Customer domain name registration information is made publicly available in the registry of domain names.

### **Where to Direct Questions About TAPA's Privacy Policy**

If you have any questions about this Privacy Policy or the practices described herein, you may contact: Customer Service, TAPA Communications, Penthouse 1, 2860 Waialae Ave, Honolulu HI 96826; or send email to <ev@tapa.com>.

### **Revisions to This Policy**

TAPA reserves the right to revise, amend, or modify this policy, our Internet Service Agreement and our other policies and agreements at any time and in any manner. Notice of any revision, amendment, or modification will be posted in accordance with the Internet Service Agreement.

### **TAPA's Commitment to Children's Privacy**

- \* Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws.

- \* TAPA recommends that children ask a parent for permission before sending personal information to TAPA, or to anyone else online.