

Cutlass Inc. Privacy Policy

This Privacy Policy applies to all of the products, services and websites offered by Cutlass Inc. or its subsidiaries or affiliated companies. Sometimes, we may post product specific privacy notices or Help Center materials to explain our products in more detail.

If you have any questions about this Privacy Policy, please feel free to contact us through our website or write to us at

Cutlass Inc.
56 Ludlow
New York, NY 10002
info@ctlss.com

Information we collect and how we use it

We may collect the following types of information:

- **Information you provide** – When you sign up for a Cutlass account, we ask you for personal information. We may combine the information you submit under your account with information from other Cutlass services or third parties in order to provide you with a better experience and to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.
- **Log information** – When you access Cutlass services via a browser, application or other client our servers automatically record certain information. These server logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account.
- **User communications** – When you send email or other communications to Cutlass, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. When you send and receive SMS messages to or from one of our services that provides SMS functionality, we may collect and maintain information associated with those messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction. We may use your email address to communicate with you about our services.
- **Affiliated Cutlass Services on other sites** – We offer some of our services on or through other Internet services and web sites. Personal information that you provide to those sites may be sent to Cutlass in order to deliver the service. We process such information under this Privacy Policy.
- **Third Party Applications** – Cutlass may make available third party applications, such as gadgets or extensions, through its services. The information collected by Cutlass when you enable a third party application is processed under this Privacy Policy. Information collected by the third party application provider is governed by their privacy policies.
- **Location data** – Cutlass offers location-enabled services. If you use those services, Cutlass may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location (such as a cell tower ID).
- **Other sites** – This Privacy Policy applies to Cutlass services only. We do not exercise control

over the sites displayed as search results, sites that include Cutlass applications, products or services, or links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

In addition to the above, we may use the information we collect to:

- Provide, maintain, protect, and improve our services (including advertising services) and develop new services; and
- Protect the rights or property of Cutlass or our users.

If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

Information sharing

Cutlass only shares personal information with other companies or individuals outside of Cutlass in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our or their behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of Cutlass, its users or the public as required or permitted by law.

If Cutlass becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to Cutlass employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Accessing and updating personal information

When you use Cutlass services, we make good faith efforts to provide you with access to your personal

information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Because of the way we maintain certain services, after you delete your information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

Enforcement

Cutlass regularly reviews its compliance with this Privacy Policy. When we receive formal written complaints, it is Cutlass's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Cutlass and an individual.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Last Reviewed on *November 28, 2011*

By (Steve Bull, signature on file)

Spell Name and Title: *Steve Bull, CEO/Founder*