

Data Privacy Policy

Effective as of May 21st 2013, SMS Strategy Inc. (dba CIOarena) and its subsidiaries, (collectively, the "SMS Strategy Inc" or "we" or "us" or "our") have updated our Privacy Policy ("Policy").

1. Introduction

This Policy details our commitment to protecting the privacy of individuals who visit our Websites ("Website Visitors"), who register to use the products and services which we market for subscription (available at www.cioarena.com (the "Service(s)"), or who attend or register to attend sponsored events or other events at which the SMS Strategy Inc. participates ("Attendees"). For the purposes of this Policy, the term, "Websites", shall refer collectively to www.cioarena.com as well as the other websites that the SMS Strategy Inc. operates and that link to this Policy.

2. Scope of This Policy

In this Policy, personal information means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, and online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity. The use of information collected through our Service shall be limited to the purpose of providing the Service for which the Client has engaged.

Our Websites may contain links to other websites and the information practices and the content of such other websites are governed by the privacy statements of such other websites. We encourage you to review the privacy statements of any such other websites to understand their information practices.

Apart from Account Information (as defined below) and other information we collect in connection with your registration or authentication into our Services, this Policy does not apply to our security and privacy practices in connection with your use of the Services. These security and privacy practices, including how we protect, collect, and use electronic data, text, messages, communications or other materials submitted to and stored within the Services by You ("Service Data"), are detailed in and governed by our Service Agreement or such other applicable agreement between you and any member of the SMS Strategy Inc. relating to your access to and use of such Services (collectively referred to as the "Service Agreement").

Clients of our Services are solely responsible for establishing policies for and ensuring compliance with all applicable laws and regulations, as well as all privacy policies, agreements or other obligations, relating to the collection of personal information in connection with the use of our Services by individuals (also referred to as "data subjects") with whom our Clients interact. If you are an individual who interacts with a Client using our Services, then you will be directed to contact our Client for assistance with any requests or questions relating to your information used by the Client post event.

We collect information under the direction of our Client and have no direct relationship with individuals whose personal information we process in connection with our Client's use of our Services. If you are an individual who interacts with a Client using our Services (such as an Attendee) and would either like to amend your contact information or no longer wish to be contacted by one of our Client that use our Services, please contact the Client that you interact with directly.

3. Information That You Provide To Us

Account and Registration Information:

We ask for and may collect personal information about you such as your name, address, phone number, email address, as well as certain related information like your company name and website name, when you register to access or utilize one or more of our Services.

We refer to any information described above as "Information" for the purposes of this Policy. By voluntarily providing us with Account Information, you represent that you are the owner of such personal data or otherwise have the requisite consent to provide it to us.

Other Submissions:

We ask for and may collect personal information from you when you submit web forms on our Websites or as you use interactive features of the Websites, including, participation in surveys, contests, promotions, sweepstakes, requesting customer support, or otherwise communicating with us.

4. Information Collected From Other Sources Social Media Widgets:

The Websites include social media features, such as the Facebook Like button, and widgets, such as the Share This button or interactive mini-programs that run on our Websites. These features may collect your Internet protocol address, which page you are visiting on the Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Websites. Your interactions with these features are governed by the privacy statement of the companies that provide them.

Information From Third Party Services:

We may also obtain other information, including personal information, from third parties and combine that with information we collect through our Websites. For example, we may have access to certain information from a third party social media or authentication service if you use our Services through such a service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third party social media or authentication service is in accordance with the authorization procedures determined by that service. By authorizing us to connect with a third party service, you authorize us to access and store your name, email address(es), current city, profile picture URL, and other personal information that the third party service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on these third party services to understand and change the information sent to us through these services.

5. How We Use Information That We Collect General Uses:

We may use the information we collect about you (including personal information, to the extent applicable) for a variety of purposes, including to (a) provide, operate, maintain, improve, and promote the Services; (b) process and complete transactions, and send you related information, including purchase confirmations and invoices; (c) send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages. (d) Registrant contact information which is limited to the name, title, company, phone, email and physical address which is entered on the registration form will be shared with our sponsors for the purposes of post event follow up communications.

By registering you agree that your data is being shared with the sponsors

Where we rely on your consent to process the personal information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our (or a third party's) legitimate interests which are not already described in this Notice, we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided further below in Section 16.

6. Sharing of Information Collected

Third-Party Service Providers:

We share information, including personal information, with our third-party service providers that we use to provide hosting for and maintenance of our Websites, application development, backup, storage, payment processing, analytics and other services for us. These third-party service providers may have access to or process your personal information for providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights:

In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Service Agreement, or as otherwise required by law.

Testimonials:

From time to time, we may post testimonials on the Websites that may contain personal information. We obtain your consent to post your name along with your testimonial. If you wish to update or delete your testimonial, you can contact us at info@cioarena.com

6. How Long We Retain Your Personal Information:

We will retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

For personal information that we process on behalf of our Clients, we will retain such personal information in accordance with the terms of our agreement with them, subject to applicable law.

7. Your Privacy Rights

Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at info@cioarena.com

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received.

If you are a Client or otherwise provide us with personal information in connection with your use of our Websites or Services, we will delete this information upon your request, provided that, notwithstanding such request, this information may be retained for as long as you maintain an account for our Services, or as needed to provide you with our Services, comply with our legal obligations, resolve disputes and enforce our agreements.

- **Right of erasure:** In certain circumstances, you may have a broader right to erasure of personal information that we hold about you – for example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.
- **Right to restrict processing:** You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold about you is inaccurate or unlawfully held).
- **Right to data portability:** In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information to another data controller without hindrance.

If you would like to exercise such rights, please contact us at the contact details. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

9. Changes to This Policy

If there are any material changes to this Policy, you will be notified by our posting of a prominent notice on the Websites prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Websites or the Services constitutes your agreement to be bound by such changes to this Policy. Your only remedy, if you do not accept the terms of this Policy, is to discontinue use of the Websites and the Services.

10. Contact Us

If you have questions regarding this Policy or about the SMS Strategy Inc.'s privacy practices, please contact us by email at info@cioarena.com