

Touchstone Pathway Privacy Notice and Security Measures

What data do we collect and use?

When you use Touchstone Pathway services, you trust us with your data. Here are the three main types of data we collect and use:

- Things you do while on the Touchstone Pathway application

When you use our services — for example when you send a survey or an email to a client, we save that information for your and your client's use and recollection at a later date.

- Things you add to or create in the application

We store and protect what you create using our services. This can include:

- Emails you send and receive via the Touchstone Pathway application
- Surveys you send and completed surveys you receive
- Surveys you create, add or edit
- Survey questions you add or edit
- Client Notes you add or edit
- Contacts and client data you add or import

A feature of the Touchstone Pathway application is the ability to create new or edit existing surveys. You may also choose to share new or edited surveys with other users of the service. You control whether or not you choose to share these new or edited surveys. In addition, Touchstone Pathways retains the right to add or edit its own surveys based on the usage patterns of its customers.

- Things that make you uniquely you

When you sign up for a Touchstone Pathway account, we keep the basic information that you give us and client information you add or import. This can include:

- Names
- Email addresses
- Birthdays
- Gender
- Phone number
- Country

In addition, you may import data from your client relationship management system that includes additional personal client data. We will use this data to enhance our service

offerings and improve your ability to serve your clients. You may choose to use this data in Touchstone Pathway or delete it, or not download it in the first place. It is your choice.

Third Party Vendors

We utilize other companies and individuals to perform functions on our behalf. Examples include technology service and support, customer service and support, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), and processing credit card payments. They have access to personal information needed to perform their functions, but may not use it for other purposes.

Business Transfers

As we develop our business, we might sell or buy subsidiaries or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the event that Touchstone Pathway, Inc. or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.

Protection of Touchstone Pathway and Others

We release account and other personal information when we believe release is appropriate to comply with the law; enforce or apply our (Terms of Service) and other agreements; or protect the rights, property, or safety of Touchstone Pathway, Inc., our customers, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. Obviously, however, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Notice.

We use Cookies

Cookies are unique identifiers that we transfer to your device to enable our systems to recognize your device and to potentially provide certain features now or in the future. The Help feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Because cookies allow you to take advantage of some of Touchstone Pathway's essential features, we recommend that you leave them turned on.

Are Children Allowed to Use Touchstone Pathway?

Touchstone Pathway does not offer its services directly to children. If you are under 18, you may use Touchstone Pathway only with the involvement of a parent or guardian.

Terms of Service, Notices, and Revisions

If you choose to utilize the Touchstone Pathway application, your use and any dispute over privacy is subject to this Notice and our (Terms of Service) including limitations on damages, resolution of disputes, and application of the law of the state of Tennessee. If you have any concern about privacy at Touchstone Pathway, please contact us with a thorough description, and we will try to resolve it.

Our business changes constantly, and our Privacy Notice and the (Terms of Service) will undoubtedly change also. We may e-mail periodic reminders of our notices and terms, but you should check our Web site frequently to see recent changes.

Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

Data security is a primary concern and something we take very serious

If your data is not secure, it is not private. That is why we house the Touchstone Pathway service on Heroku. As a wholly owned subsidiary of Salesforce.com, Heroku is a cloud platform based on a managed container system, with integrated data services and a powerful ecosystem, for deploying and running modern software applications. Heroku is a cloud application platform used by organizations of all sizes to deploy and operate applications throughout the world.

The Heroku platform allows organizations to focus on application development and business strategy while they focus on infrastructure management, scaling, and security. Heroku applies state of the art security practices and manages platform security so its customers can focus on their business.

The Heroku platform is designed to protect customers from threats by applying security controls at every layer from physical to application, isolating customer applications and data, and with its ability to rapidly deploy security updates without customer interaction or service interruption.

For additional details on Heroku's security policies, visit

<https://www.heroku.com/policy/security>.

Physical Infrastructure

Heroku's physical infrastructure is hosted and managed within Amazon's secure data centers and utilize the Amazon Web Service (AWS) technology. AWS continually

manages risk and undergoes recurring assessments to ensure compliance with industry standards. AWS distributes data across multiple data centers, so that in the event of a fire or disaster, it can be automatically and seamlessly shifted to stable and secure locations. AWS and the underlying infrastructure is continuously monitored to protect the Touchstone Pathway service from threats, including spam, malware, viruses, and other forms of malicious code and make it available when you need it.

Amazon's data center operations have been accredited under ISO 27001, FISMA Moderate, PCI (Payment Card Industry) Level 1, and Sarbanes-Oxley (SOX). AWS is subject to SOC 1 and SOC 2/SSAE 16/ISAE 3402 (Previously SAS 70 Type II) audits.

- **Physical Security**

Heroku utilizes ISO 27001 and FISMA certified data centers managed by Amazon. Amazon has many years of experience in designing, constructing, and operating large-scale data centers. This experience has been applied to the AWS platform and infrastructure. AWS data centers are housed in nondescript facilities, and critical facilities have extensive setback and military grade perimeter control berms as well as other natural boundary protection. Physical access is strictly controlled both at the perimeter and at building ingress points by professional security staff utilizing video surveillance, state of the art intrusion detection systems, and other electronic means. Authorized staff must pass two-factor authentication no fewer than three times to access data center floors. All visitors and contractors are required to present identification and are signed in and continually escorted by authorized staff.

- **Sarbanes-Oxley**

As a publicly traded company in the United States, salesforce.com is audited annually and remains in compliance with the Sarbanes-Oxley (SOX) Act of 2002.

- **Service Organization Controls (SOC) Reports for Service Organizations**

AWS is subject to SOC 1 and SOC 2/SSAE 16/ISAE 3402 (Previously SAS 70 Type II) audits. Service Organization Controls (SOC) reports are designed to help service organizations, organizations that operate information systems and provide information system services to other entities, build trust and confidence in their service delivery processes and controls through a report by an independent Certified Public Accountant. Each type of SOC report is designed to help service organizations meet specific user needs. Visit the following link for additional information on these AICPA audit standards.

<https://www.aicpa.org/InterestAreas/FRC/AssuranceAdvisoryServices/Pages/ServiceOrganization'sManagement.aspx>

- **Penetration Testing and Vulnerability Assessments**

Third party security testing of the Heroku application is performed by independent and reputable security consulting firms. Findings from each assessment are reviewed with the assessors, risk ranked, and assigned to the responsible team.

- **Application Isolation**

Each application on the Heroku platform, including Touchstone Pathway, runs within its own isolated environment and cannot interact with other applications or areas of the system. This restrictive operating environment is designed to prevent security and stability issues. These self-contained environments isolate processes, memory, and the file system using LXC (Linux Containers) while host-based firewalls restrict applications from establishing local network connections.

For additional technical information on application isolation, visit <https://devcenter.heroku.com/articles/dyno-isolation>.

Amazon only provides data center access and information to employees who have a legitimate business need for such privileges. When an employee no longer has a business need for these privileges, his or her access is immediately revoked, even if they continue to be an employee of Amazon or Amazon Web Services. All physical and electronic access to data centers by Amazon employees is logged and audited routinely.

Encryption keeps your data private while in transit

Encryption brings a higher level of security and privacy to our services. When you do things like import CRM contact data or send an email to your clients or to Touchstone Pathway, the data moves between your devices and the Touchstone Pathway application which is hosted on the Heroku/AWS platforms. We protect this data with multiple layers of security, including leading encryption technology like HTTPS and Transport Layer Security.

- HTTPS stands for HyperText Transfer Protocol over SSL (Secure Socket Layer). It is a TCP/IP protocol used by Web servers to transfer and display Web content securely. The data transferred is encrypted so that it cannot be read by anyone except the recipient.
- TCP/IP (Transmission Control Protocol/Internet Protocol) is the basic communication language or protocol of the Internet. It can also be used as a communications protocol in a private network (either an intranet or an extranet).
- Transport Layer Security (TLS) and predecessor, Secure Sockets Layer (SSL), both frequently referred to as "SSL", are cryptographic protocols that provide communications security over a computer network. The connection is private (or secure) because symmetric cryptography is used to encrypt the data transmitted.

For additional information on security features used at Amazon Web Services, visit <https://aws.amazon.com/security/>

