

1. OVERVIEW

WINDEM PRIVACY POLICY

WinDem operates the Site and provides the Platform. We are committed to ensuring that your personal information shared over our Site and/or Platform is protected and kept confidential. By accepting WinDem's Terms of Service or providing information to us via our Site or Platform, you consent to the use and disclosure of personally identifiable information as outlined in this Privacy Policy. Please note that the use and disclosure of such information is also subject to the practices of the Counselors using the Platform.

2. SECURITY OF PERSONAL INFORMATION

We take your privacy and the security of your personal information seriously. Your personal information will be stored in a secure manner. We have implemented a variety of commercially standard encryption and security technologies and procedures to protect your personal information which is stored in our computer systems from unauthorized access. We also maintain standard physical and electronic procedural safeguards that limit access to your personal information to our employees (or people working on our behalf and under confidentiality agreements) who, through the course of standard business activities, need to access your personal information.

3. COLLECTION AND USE OF PERSONAL INFORMATION

We will only collect information that is voluntarily submitted. We know that privacy is of the utmost importance. We vigorously believe in keeping confidential any and all personally identifiable information that identifies an individual user.

We assume you are giving consent to this information collection and use, but we also give you the opportunity to "opt out" of receiving direct marketing or market research information by emailing us at windem.org.

We maintain web logs to record data about all visitors who use the Site and interact with the Platform and we will store this information. These logs may contain IP address information, types of operating system you use, the date and time you visited the site, and information about the type of device you use to connect to the Site, the Platform and related services.

All Web logs are stored securely and are accessible to a very limited number of employees and contractors, who must adhere to strict guidelines regarding user data security and privacy.

4. NON-PERSONAL IDENTIFICATION/COOKIES TECHNOLOGY

We use cookie technology in the aggregate as opposed to using any personally identifiable information, to understand how our users collectively use our Site and Platform. This helps us continually improve our services. Most web browsers are set to accept cookies, but if you

prefer not to receive cookies you can set your browser to warn you or refuse cookies all together by turning them off in your browser.

We may also use non-personal information to analyze data into useful information. This process of data mining is done in the aggregate, is non-personal, and allows Company to find correlations and patterns in the data.

5. SAFEGUARDS EMPLOYED

We use account information in a password-protected environment as a security measure to protect your data. We use administrative, physical and technical safeguards to protect data. We maintain a high level of data protection via safeguards such as data backup, audit controls, access controls, and some data encryption. The Site and the Platform use industry standard SSL encryption to enhance security of electronic data transmissions. In addition, we urge you to take precautionary measures in maintaining the integrity of your data. Please be responsible in making sure no one can see or has access to your personal account and log-in/password information. If you use a public computer, e.g., at a library or a university, always remember to log out of the Site or Platform.

If you use our Site or Platform through a public computer network or through an internet café, library or other potentially non-secure internet connection, such use is at your own risk. It is your responsibility to

check beforehand on such other site's privacy and security policy with respect to Internet use.

We are not responsible for your handling, sharing, re-sharing and/or distribution of users' personal information. Moreover, if you forward personal information electronically to another person on or off the Site or Platform, we are not responsible for any harm or other consequences from third- party use or re-sharing of your information.

6. SELF REVIEW OF DATA AND ABILITY TO DELETE YOUR ACCOUNT INFORMATION

You may request to delete any personal information and to de-authorize the collection of personal information in the future by sending us an email at info@windem.org.

7. THIRD PARTY SITES/TRUSTED RELATIONSHIPS

Our Site and Platform may contain links to other websites maintained by unrelated third parties. We do not share your personally identifiable information with those websites (unless you specifically authorizesuchsharing)andarenotresponsiblefortheirprivacyprocedures. Weseek to work with trusted partners and organizations that will adhere to similar privacy and ethical standards. However, we encourage you to learn their particular privacy policies.

We disclose personally identifiable information about you as required or permitted by law, including complying with legal process (for example, we may disclose your information as necessary to comply with an authorized civil, criminal or regulatory investigation). We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities and may, in our sole discretion, disclose personal information or other information to satisfy any law, regulation, subpoena, or government request. We reserve the right to release personal information or other information about users who we believe are engaged in illegal activities or are otherwise in violation of our Terms of Service, even without a subpoena, warrant or court order, if we believe, in our sole discretion, that such disclosure is necessary or appropriate to operate our web site or to protect our rights or property, or that of our affiliates, or our officers, directors, employees, agents, third-party content providers, suppliers, sponsors, or licensors. We also reserve the right to report to law enforcement agencies any activities we reasonably believe in our sole discretion to be unlawful. If we are legally compelled to disclose information about you to a third party, we will attempt to notify you by sending an email to the email address in our records unless doing so would violate the law or unless you have not provided your email address to us.

8. CHANGES TO THIS PRIVACY POLICY

We may amend our Privacy Policy in the future. In the event changes are made, we will be sure to post changes at the Site and at other places we deem appropriate.

9. QUESTIONS OR SUGGESTIONS

If you have any questions or suggestions on ways we can improve our Privacy Policy with respect to personal information, please email us at info@windem.org.

© 2018 WinDem, LLC. All Rights Reserved.