ESM Software Group, Inc. Privacy Statement, effective as of May 21, 2015

ESM Software Group, Inc. and its subsidiaries ("ESM Software" or "we") are committed to protecting the privacy of the personally-identifiable information ("Personal Information") that we collect from you as you visit www.esmsuite.com ("Website") or use/license the Executive Strategy Manager® or the ESM® ("Software").

This Privacy Statement describes ESM Software's privacy practices in relation to the use of the Website and the Software. ESM Software abides by the US-EU Safe Harbor Framework as designated by the US Dept. of Commerce and the European Union pursuant to EU Directive 95/46/EC. ESM Software certifies that it adheres to the Safe Harbor Principles which can be reviewed at http://www.export.gov/safeharbor.

Personal Information Collected and Why

Contact Information and User Registration
ESM Software collects contact information on certain areas of the Website when users register, request publications, or subscribe to e-mail lists. We do so in order to send you requested information, to contact you with other relevant service or product information, news or promotions. Contact information may include but is not limited to a unique access ID, company or school affiliations, titles, and contact information, such as names, mailing addresses, e-mail addresses, and telephone and fax numbers.

ESM Software will also collect contact information for users of the Software when new profiles are created.

IP addresses
ESM Software may use your IP address to help diagnose problems with our servers, to administer our website, or to gather broad demographic information.

Cookies and Web beacons
ESM Software may use cookies to enhance your user experience and deliver personalized content. Cookies help us to deliver information specific to your interests and to save you having to re-enter your information each time you visit the Website. Cookies also allow us to better analyze our Website traffic patterns so that we can improve the services and information we provide on the Website. We do not follow your browsing path outside of the Website.

ESM Software may also use web beacons, which are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon.

E-mail addresses
If ESM Software is provided with an email address, ESM Software may contact you using the

same. ESM Software will not share your e-mail address with others outside ESM Software and our trusted partners.

You may choose not to receive e-mails at any time. For more details, see the Opt-out section below.

Demographic and user profile data
ESM Software may use demographic or user profile data we collect to tailor your Website experience, showcase content that we think may interest you, and display information that matches your preferences. This data also gives us an insight into your needs and interests.

Software
Typical data included in ESM reflects strategic elements such as objectives, measures, initiatives the client is managing to help execute strategy. Detailed fields such as definitions, owners, charts, data tables are usually captured within each element. Personally identifiable information as related to HIPPA is typically not found in ESM.

Security

ESM Software uses robust security measures to protect any personal information from unauthorized access, maintain data accuracy, and help ensure the appropriate use of said information. ESM Software hosts its website in a secure server environment that uses firewalls and other advanced technology to prevent interference or access from outside intruders. ESM Software also offers enhanced security features within its Services that permit Customers to configure security settings to the level they deem necessary.

All information collected via ESM is stored in a separate and secure data storage center. This personal information will be destroyed upon written instruction from a client.

ESM Software clients are responsible for maintaining the security and confidentiality of their ESM Software usernames and passwords.

Links to other sites

The Website contains links to other sites. ESM Software is not responsible for the privacy practices or the content of these sites. Please refer to the policies of the respective site(s) as we encourage you to review and understand the privacy policies before providing any information to them.

Third Party Disclosure

ESM Software shall not intentionally disclose (and shall take commercially reasonable steps to

prevent the accidental disclosure of) your Personal Information to third parties (i.e., persons or entities that are not affiliates of ESM Software), whether for such third parties' marketing purposes or otherwise, subject only to the following five exceptions:

1. ESM Software may disclose your Personal Information to third parties as required or permitted by the laws, rules, and regulations of any nation, state, or other applicable jurisdiction;
2. ESM Software may disclose your Personal Information to third parties who deliver information from us to you for the purpose of performing such delivery;
3. ESM Software may disclose your Personal Information if, in connection with submitting the information, you consent to such disclosure;
4. ESM Software may disclose contact information for you in response to inquiries by bona-fide rights owners in connection with allegations of infringement of copyright or other proprietary rights arising from information you have posted on the website or otherwise provided to ESM Software;
5. If ESM Software and/or any of its affiliates merges with or sells substantially all of its assets or a majority of its equity to a third party, information collected by ESM Software or such affiliates on the Website may be disclosed to and owned by the merged entity or third party.

International Transfer of Information

Personally-identifiable information collected on the website may be transferred from time to time to ESM Software offices located throughout the world, including offices located outside the European Economic Area (EEA), and the Site may be viewed and hosted anywhere in the world, including countries (such as the United States) that may not have laws regulating the use and transfer of personally-identifiable data. By using the Site and submitting such information on it, you voluntarily consent to such transborder transfer and hosting of such information.

Opt-Out

You may opt-out of receiving communications from ESM Software at any time that you wish. If you wish to be removed from the Website registration database, you may click the "unsubscribe" link at the bottom of any email, complete the Contact Us form available on the website noting your request to be unsubscribed in the comments field, or e-mail or write to the webmaster at the address below with the request to be "unsubscribed."

Questions

If you have any questions about this privacy statement, the practices of this site, or your dealings with this Web site, feel free to contact:

Kent Smack
Managing Director

ESM Software Group, Inc.

Your Consent and Our Revisions

By using this website and/or the Software, you consent to the collection and use of the information as described here. If ESM Software amends this Privacy Policy, we will post the changes on this page so that you always will know what information we collect, how we use it, and when and how we will disclose it.

How can I access, change, and/or delete information?
You may access, correct, update, and/or delete any personally-identifiable information that you submitted to the Site. To update your account information, go to the "**View User / Scorecard Information**" page.