PERFORMANCE SUPPORT SYSTEMS, INC.
ProStar Coach
Privacy and Security Statement

The following definition applies to the terms as they appear in this agreement: ProStar means ProStar Coach, the database software used in creating this service and all versions of the service, including, but not limited to Strong for Performance, Coaching on Demand (powered by Strong for Performance) and Strong for Achievement.

ProStar Coach is a self-directed learning service delivered online at the website prostarcoach.com by Performance Support Systems, Inc. (referred to in the terms of service as "PSS").

The following privacy statement discloses the privacy practices for ProStar Coach and applies solely to information collected through the use of ProStar Coach.

Information Collection, Use, and Sharing

Strong for Performance and Strong for Achievement have two types of "Users." "Administrators" purchase the administrator dashboard for use with their development programs. "Subscribers" are the individuals who are assigned a one-year subscription to Strong for Performance or Strong for Achievement by the Administrator.

Only ProStar's Administrator and authorized PSS technical personnel who maintain ProStar have access to personal information. This Privacy and Security Statement applies to all PSS employees, restricts the use of ProStar information and requires that it be held in strict confidence.

PSS will ask for only the information that is needed to provide the services requested.

Any personal information entered will be used only for the services requested.

PSS will never give, rent or sell any item of User's personal information to any person, organization or web site for any reason.

Types of Information Collected and Stored

The information below applies to all Users unless it's specifically noted otherwise.

PSS will not disclose to any third party any information stored in ProStar or allow unauthorized access to sensitive records for any reason.

Cookies

Cookies are used to maintain a link between User's login session and the PSS server. PSS does not use cookies to collect personally identifiable information or to track usage.

Name and Email Address

Names and email-addresses are the only personal information that is needed to access Strong for Performance or Strong for Achievement.

Individual Password

When each User logs into their account for the first time, they must create a secure password of their choice. Passwords are encrypted.

Action and Reflection Exercises

Each subscriber completes action statements and reflection exercises in order to process and learn new skills attained through the service. Exercises are saved in

their Learning Archive and are associated with their secure personal ID, not their individual names.

<u>Statistics</u>

The following statistics are maintained so Administrators can monitor Subscriber usage:

- Subscriber name
- Current focus
- Number of months using Strong for Performance
- Last login date
- Number of content exercises completed
- Number of reflection exercises completed
- Number of exercises completed with requested input
- Number of people in coaching network
- Number of people subscriber is coaching
- Number of times feedback was requested

Details of ProStar Data Protections

<u>Web Security</u>

ProStar data is stored on a Cogeco Peer1 Hosting server located in the U.S. and is accessible over the Internet only by the User.

PSS has in place appropriate technical and organizational measures to protect data on ProStar from loss, misuse, unauthorized access, disclosure and alteration and destruction. Information is protected through password protocols, internal procedures, a state-of-the-art firewall, and encryption programs.

Data encryption is used to protect sensitive information transmitted online, including encrypted transmission of data through Secure Sockets Layer (SSL) protocols.

Only PSS technical support personnel, who need the information to perform a specific task for a User, are granted access to sensitive, personally identifiable information and only with the expressed permission of the ProStar User.

Physical Security

The ProStar server is physically located at and serviced by Cogeco Peer1 Hosting, 2300 NW 89th Place, Miami, FL 33172.

A dedicated server is used for the ProStar database.

Power backups are in place to maintain service and protect personal information during outages.

Physical access to the equipment, wiring and ports is denied except for authorized Cogeco Peer1 Hosting personnel or those accompanied by authorized personnel.

Network connectivity to the facility is designed to provide high capacity and is fully redundant.

Data Security

The ProStar database server contains a state-of-the-art hardware firewall device with all non-essential ports disabled. As a result, the public Internet is denied access to the database.

The database server does not face the web and is behind a hardware firewall with an IP whitelist.

Only PSS technical personnel and Cogeco Peer 1 Hosting have access to the server.

SSL encryption (https) is available for the transmission of personal information and other data.

Virus protection and prevention programs are continuously upgraded.

Bi-weekly vulnerability and penetration assessments on PSS's servers are performed by Cogeco Peer 1 Hosting.

The entire server is backed up nightly and stored off-site by Cogeco Peer 1 Hosting.

Disaster recovery protocols are in place to protect personal information in case of a disaster.

Data Security Hygiene Protocols

Data is stored on a separate database server that does not face the Internet.

Everywhere on ProStar, all data input is "sanitized." This means that any executable script entered into ProStar is automatically changed to text to prevent hackers from inserting viruses or malicious programs and other database attacks.

Administrative access to PSS servers is behind a firewall that blocks all traffic except ProStar.

Client data is separated logically, not physically. The software application delivers data only to the appropriate authenticated User.

All Internet transmissions containing sensitive information may be SSL encrypted (https).

Security Monitoring and Auditing

ProStar data is professionally housed and monitored by Cogeco Peer 1 Hosting. Cogeco Peer 1 Hosting's complete Privacy Policy is available here: https://www.cogecopeer1.com/en/legal/privacy-policy/

Cogeco Peer 1 Hosting's staff monitors the security from their data centers 24 hours a day, 7 days a week.

Cogeco Peer 1 Hosting's system is monitored by an advanced proprietary, SSAE-16-Type-II, CSAE-3416 and ISAE-3402 audited and documented system. More information about Peer1 Hosting's auditing and certification is available here:

https://www.cogecopeer1.com/en/?s=SSAE+renewal

In the event of a security breach, PSS's Chief Software Engineer Consultant is notified immediately by email.

All access to PSS's server is logged, including Windows and SQL login attempts.

Logs are reviewed regularly by PSS's Chief Software Engineer Consultant and Technical Support Specialist.

In the highly unlikely event of any breach of the security, confidentiality, or integrity of User unencrypted electronically stored personal data, PSS will make any legally-required disclosures via email or conspicuous posting on this site in the most expedient time possible and without unreasonable delay, consistent with (1) the legitimate needs of law enforcement or (2) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Miscellaneous

Downtime

Downtime is rare. The server currently has an up time of 99.9% since 2004.

PSS subscribes to a third-party service that notifies PSS immediately if there are any outages or errors.

If PSS must take the server down for maintenance, it is performed on weekends when User usage is minimal and Users are notified in advance.