

Privacy Policy

Fortres Grand Corporation ("Fortres Grand", "we", "us") is concerned about online privacy issues and wants you to be familiar with how we collect, use and disclose your Personally Identifiable Information (as defined below). This Privacy Policy (the "Policy") describes our practices in connection with Personally Identifiable Information that we collect through our websites located at www.fortresgrand.com and app.fortresgrand.com ("Sites") and through the exercise of rights granted by our software license ("Products").

The Sites and Products made available by Fortres Grand are subject to this Policy. We reserve the right to update or make changes to this Policy from time to time in our sole discretion without prior notice, which changes we may provide to you by any reasonable means, including without limitation, by posting the revised version of this Policy on our Sites. You can determine when this Policy was last revised by referring to the "Updated" legend at the bottom of this Policy. Any changes to our Policy will become effective upon our posting of the revised Policy. Use of the Sites or Products following such changes constitutes your acceptance of the revised Policy then in effect. By using the Sites or Products, you agree to the terms and conditions of this Policy. If you do not agree to the terms and conditions of this Policy, please do not use the Sites or Products.

Note Regarding the Use of the Site by Children: The Site is not directed to individuals under the age of thirteen (13), and we request that such individuals do not provide Personally Identifiable Information through the Site. If we learn that it has collected Personally Identifiable Information on a child under the age of 13, we will delete that data from its systems. We encourage parents and guardians to go online with their children.

1. What Types of Information Does Fortres Grand Collect From Me?

Fortres Grand gathers two basic types of information through the Sites and Products: "Personally Identifiable Information" (or "PII") and "Non-Personally Identifiable Information" (or "Non-PII"). Personally Identifiable Information is information that identifies a person as an individual, including without limitation, name, email address, postal or other physical address, telephone number, credit or debit card number (or other payment account number), title, occupation, and other information. Non-Personally Identifiable Information is aggregated information, demographic information and any other information that does not reveal a person's specific identity. An IP Address is the Internet Protocol address of the computer that you are using.

a. Personally Identifiable Information. You do not have to provide PII to use the Sites. However, in order for you to take advantage of particular opportunities provided through the Sites (for example, to sign up for a newsletter or order products from the Sites) or provided by the product, we may require that you furnish PII. We collect PII from you through the Site and the Products only when you voluntarily provide it to us. Fortres Grand is committed to protecting the Personal Information you share with us. When we transfer sensitive personal data (for example, credit card information) over the Internet, Fortres Grand protects it using Secure Sockets Layer (SSL) or Transport Layer Security (TLS) encryption technology. Fortres Grand uses a combination of industry-standard security technologies, procedures, and organizational measures to help protect your PII from unauthorized access, use or disclosure. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your PII, Fortres Grand

cannot guarantee its security. Fortres Grand recommends you to take every precaution in protecting your PII when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser. We also may use third-party payment services (each, a "Payment Service") to collect payments made through the Site. When we use a Payment Service, you will be directed to a webpage that is hosted by the Payment Service (or the Payment Service's service providers) and not by Fortres Grand (such page, the "Payment Service Page"). In addition, any PII that you provide through the Payment Service Page may be collected by Payment Service(s) and not by Fortres Grand, and will be subject to Payment Service's privacy policy, rather than this Policy. Fortres Grand has no control over, and shall not be responsible for, Payment Service's use of information collected through the Payment Service Page. PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE COLLECTION AND USE OF INFORMATION THROUGH THE PAYMENT SERVICE PAGE OR THE PRIVACY OR INFORMATION PRACTICES OF ANY PAYMENT SERVICE.

b. Non-Personally Identifiable Information. When you visit and interact with the Site, Fortres Grand may collect Non-PII (for example, a catalog of the Site pages you visit). Non-PII is generally collected through the Site from four different sources: (i) environmental variables, (ii) cookies, (iii) pixel tags and other similar technologies, and (iv) information that you voluntarily provide to us.

i. Environmental Variables. We and our service providers may also collect certain environmental variables, such as your MAC address, computer type (Windows or Macintosh), screen resolution, OS version, Internet browser, and Internet browser version. These environmental variables are collected by most websites, and can be used to optimize your experience on the Site.

ii. Cookies. We and our service providers may use "cookies" on the Site. Cookies are data that a web server transfers to an individual's computer for recordkeeping and other purposes. We use cookies and other technologies to facilitate users' ongoing access to and use of our Site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular website, to your computer.

iii. Pixel Tags. We and our service providers may also use pixel tags or similar technology in connection with Site pages and email messages to, among other things, track the actions of Site users and email recipients, to determine the success of marketing campaigns and to compile aggregate statistics about Site usage and response rates.

iv. Information That You Voluntarily Provide. Fortres Grand also collects Non-PII (e.g., your geographic location, etc.) when you voluntarily provide such information to us. Such information constitutes Non-PII because, unless combined with PII, it does not personally identify you or any other user. Additionally, we may aggregate PII in a manner such that the end-product does not personally identify you or any other user of the Site, for example, by using PII to calculate the percentage of our users who have a particular telephone area code. Such aggregate information is considered Non-PII for purposes of this Policy.

v. Software and Hardware Information. Some Products include features that provide reporting of hardware and software changes on endpoint devices. To facilitate these feature Fortres Grand may take snapshots of the hardware and software environment of endpoint devices upon which you installed our Products. Fortres Grand Products often share components. Some products that do not provide

reporting features may contain components that also take snapshots of the hardware and software environment.

c. IP Addresses. When you visit and interact with the Sites, Fortres Grand and third parties with whom Fortres Grand has contracted to provide services to Fortres Grand may collect IP Addresses. Your Internet Protocol (IP) address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). This number is identified and logged automatically in our server log files whenever you visit the Sites, along with the time(s) of your visit(s) and the page(s) that you visited.

d. 2. How Does Fortres Grand Use Information Collected From Me?

a. Personally Identifiable Information. We may use PII in the following ways:

i. Fulfillment of Requests. Fortres Grand may use PII about you to fulfill the purpose for which such PII was provided (e.g., to send newsletters to you or fulfill your purchase).

ii. Administrative Communications. From time to time, in our sole discretion, we may use PII about you to send to you important information regarding the Site, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important to your use of the Site, you may not opt-out of receiving such communications.

iii. Other Communications. From time to time, we may use PII about you to inform you of products, programs, services and promotions that we believe may be of interest to you. If you would prefer that we do not send electronic marketing messages to you, please see the "Opt-Out" section below.

iv. Purchases. When you make a purchase through the Site, we may collect your credit card number or other payment account number, billing address and other information related to such purchase (collectively, "Payment Information") from you, and may use such Payment Information in order to fulfill your purchase.

v. Internal Business Purposes. We may also use PII about you for our internal business purposes, such as data analysis, audits and so forth.

b. Non-Personally Identifiable Information. Because Non-PII does not personally identify you, we may use such information for any purpose.

In some instances, we may combine Non-PII with PII (such as combining your name with your geographic location). If we do combine any Non-PII with PII, the combined information will be treated by us as PII hereunder as long as it is so combined.

3. How Is Personally Identifiable Information Disclosed?

a. Third Party Service Providers. We work with third parties who provide services including but not limited to data analysis, payment processing, order fulfillment and other services of an administrative nature. We reserve the right to share PII about you with such third parties for the purpose of enabling these third parties to provide such services (for example, if you choose to make a purchase through the Site, we may share your Payment Information or other PII with our third party service providers to fulfill your purchase, including, without limitation, to process your credit card or payment account number or to ship products to you). For avoidance of doubt, if you are making a purchase through the Site, we or

our Payment Services may disclose your Payment Information to banks, processors, card associations, and other financial institutions that are involved in the course of processing or screening the transaction applicable to the Payment Information.

b. Sell or Rent Information. Except as explained in this Policy or in agreements with our customers, Fortres Grand does not sell, rent, license or share PII of our customers with others outside Fortres Grand for non-Fortres Grand purposes without your consent.

c. Profiles. We may provide functionality on the Site that allows you to create a "profile page" (your "Profile") and post certain information and materials on your Profile. Please note that your Profile, including all PII available in your Profile, may be accessible to other users. We urge you to exercise discretion and caution when deciding to disclose PII about you, or any other information, in your Profile. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF ANY PII YOU DISCLOSE IN YOUR PROFILE.

d. Information Posted by Visitors. Fortres Grand may make available through the Site services (for example, message boards, forums, chat functionality and blogs, among other services) to which you are able to post information and materials. Please note that any information you disclose through such services or otherwise on the Site becomes public information, and may be available to visitors to the Site and to the general public. In addition, when you choose to make a posting on such services, certain PII (for example, a link to your Profile that contains PII), will be available for other users to view. We urge you to exercise discretion and caution when deciding to disclose PII, or any other information, on the Site. WE ARE NOT RESPONSIBLE FOR THE USE OF ANY PII YOU VOLUNTARILY DISCLOSE THROUGH THE SITE.

e. Assignment. We reserve the right to transfer any and all information that we collect from Site users to an Affiliated Entity or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Fortres Grand's business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

f. Law enforcement; emergencies; compliance. Notwithstanding any other provision of this Policy to the contrary, we reserve the right to disclose PII about you to others as we believe to be appropriate (a) under applicable law; (b) to comply with legal process; (c) to respond to governmental requests; (d) to enforce our Terms of Service; (e) to protect our operations or those of any Affiliated Entities; (f) to protect the rights, privacy, safety or property of Fortres Grand, you or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain. For example, we may, to the fullest extent the law allows, disclose PII about you to law enforcement agencies to assist them in identifying individuals who have been or may be engaged in unlawful activities.

4. Other Important Notices Regarding Our Privacy Practices.

a. Third Party Sites. The Site may contain links to third party websites. These linked sites are not under Fortres Grand's control and we are not responsible for the privacy practices or the contents of any such linked site, or any link contained in any linked site. We provide such links only as a convenience, and the inclusion of a link on the Site does not imply endorsement of the linked site by Fortres Grand. If you provide any PII through any such third party website, your transaction will occur on such third party's website (not the Site) and the PII you provide will be collected by, and controlled by the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices

of any such third parties. PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES, INCLUDING, WITHOUT LIMITATION, THE AFFILIATED ENTITIES.

b. Consent to Transfer, Processing and Storage of PII. The Sites are operated in the United States of America. If you are located in the European Union, Canada, or elsewhere outside the United States of America, please be aware that any information you provide, including without limitation, PII, to us will be transferred to the United States of America. We may transfer your information to us in the United States of America or to third parties acting on our behalf, for the purposes of processing or storage, and by providing any information to us you fully understand and unambiguously consent to the transfer, processing and storage of such information in the United States of America.

c. Security. We seek to have security measures and tools (such as Firewalls, Digital SSL Certificates, Intrusion Detection Systems, and Database Encryption) in place to help protect against the loss, misuse and alteration of the information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. As a result, although we strive to protect PII about you, we cannot ensure or warrant the security of any information you transmit to us through or in connection with the Site or that is stored by us. You acknowledge and agree that any information you transmit through the Site or upload for storage in connection with the Site is so transmitted or stored at your own risk. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us in accordance with Section 4.h ("Contacting Us") below (note that if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem).

e. Opt-Out. If you do not wish to receive marketing-related emails from us, you may opt-out of receiving such marketing-related emails by following the unsubscribe instructions at the bottom of such marketing email or choosing to unsubscribe in the Email Lists or Newsletter area of the specific Sites.

We will endeavor to comply with your request as soon as reasonably practicable.

f. Changing or Suppressing PII about you. To the extent the laws of your country entitle you to review, correct, update or suppress PII about you that has been previously provided to us, you may exercise this right by logging in to your Profile or the Accounts area of the Site or by emailing us at: info@fortresgrand.com. For your protection, we will only implement such requests with respect to the PII associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request.

In each event, you must clearly indicate the information that you wish to have changed, clearly indicate that you wish to have PII about you suppressed from our database or clearly indicate the limitations you wish to put on our use of PII about you.

We will endeavor to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed therefrom. We also reserve the right, from time to time, to re-contact former users of the Site and

Products. Finally, we are not responsible for removing information from the databases of third parties with whom we have already shared PII about you.

g. Retention Period. We will retain PII about you for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required by law and/or regulations.

h. Jurisdictional Issues. The Site is hosted by Fortres Grand from the United States, and is not intended to subject Fortres Grand to the laws or jurisdiction of any state, country or territory other than that of the United States. Fortres Grand does not represent or warrant that the Site, or any part thereof, is appropriate or available for use in any particular jurisdiction other than the United States. Those who choose to access the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. We may limit the Site's availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion. By using the Site and submitting any PII, you consent to the transfer of PII to other countries, such as the United States, which may provide a different level of data security than in your country of residence.

i. Safe Harbor. In accordance with our commitment to protect personal privacy, Fortres Grand adheres to the principles of the Safe Harbor Framework as developed by the U.S. Department of Commerce in consultation with the European Commission. The seven principles and fifteen Frequently Asked Questions (FAQs) referred to in this policy constitute Safe Harbor privacy framework. These principles and FAQs may be found at: <http://www.export.gov/safeharbor>. For questions regarding dispute resolution process, contact us via email at: info@fortresgrand.com or mail us at the address below.

j. Contacting Us. If you have any questions regarding this Policy, please contact us by email at: info@fortresgrand.com or mail us at:

Fortres Grand
Attention: Legal
900 Lincolnway East
Plymouth, IN 46563

Please note that email communications will not necessarily be secure; accordingly, you should not include credit card information or other sensitive information in your email correspondence with us.

Updated: April 17, 2017.