

# Privacy Statement

**Your privacy while using FileGenius is a priority of ours. To insure your privacy we pledge to maintain the following standards:**

We will provide, as part of all FileGenius file transfer site packages, 256-bit SSL (Secure Socket Layer) Certificate protection, to insure that your files are fully encrypted during any form of transfer, either sending or receiving, from your site. Your secure logins are also protected with the same SSL encryption and your FREE TRIAL site is equally protected in this manner. Unlike some file transfer solutions providers, we do NOT use self-signed, or cheaper, less-secure certificate formats to protect your data, no matter the type of account or trial. It's your data and your privacy starts when you enter "our house", under any circumstances.

Your files, when stored on our servers in our systems, will be kept in a name-encrypted folder/directory to further insure the security of your files.

We will not create, as the result of email-based, direct file transfers or download notices, a unique and tangible session page or "transfer delivery" notice page that is stored in a non-secure location on the web. Unlike other prominent file transfer solution providers we use a more secure method (that is also simpler and easier to use). The web is littered with thousands of these pages from other file transfer solutions providers and many can be easily found by conducting a simple search through popular search engines. Once accessed the files can then be downloaded by anyone.

Your site address and any other organization identifying information will not be disclosed in any way. Unlike other prominent file transfer solution providers who publish their customers' private file transfer site addresses on their web sites, in their marketing materials, in broadcast emails sent to hundreds of thousands of people, and in sales letters to prospective customers, we give our strongest guarantee that we will not publish the address of your private file transfer site anywhere, nor will we publicize the fact you are our customer unless you have given us express, written permission to do so. The decision to publish the address of your FileGenius private, secure file transfer site is all yours.

We pledge to not offer incidental, ongoing free file transfer service. We do this to reduce the number of users and types of users, thereby eliminating some of the key, root causes of internet and web-based security violations.

We will not store your user password in a readable or usable format anywhere in our own systems. Should you forget your password you only have to request a new, temporary one that you can quickly change back to your old one or create a new one. You do this with the assurance we will not have access to your new password either.

We will not use intermediary merchant services and payment processors who will, at every stage, store your credit card information as it is being passed to the end-use processor of your purchase and subscription re-billings. Your credit card information will not be stored in our systems. We have crafted our own proprietary, secure integration with an end-destination credit card/payment processor, assuring your card information will only live in one data location. This significantly reduces the chances your card or personal information will be stolen or misused.

Our home web site ([www.filegenius.com](http://www.filegenius.com)), unlike almost all other file transfer solutions, is NOT the login gateway for your secure file transfer site. Again, in keeping with our 100% white-label policy, we provide you with your own, dedicated login page that is located far from the traffic and noise of an E-commerce web site that may attract unwanted attention to its high-profile URL, IP address, service ports, or other network elements.

## Privacy Statement

We promise to shield you from spam and other unwanted attention on the web by providing you a file transfer site address that uses a generic base domain that is privately registered, thereby preventing ANYONE from sending or directing things toward your address unless you specifically solicit them.

We do not serve ads nor set cookies that store any personal information in your browser at our FileGenius sales site or file transfer sites. Some file transfer solution providers serve ads with cookies from their primary web site and login portal. We do not do this, thereby dramatically reducing the probability of security violations involving your purchase data or your file transfer files.

Finally, we will not sell or share the information we get from you with anyone, in an effort to provide the most secure FileGenius service and environment possible.

### **To further insure your privacy we offer the following systems-level provisions:**

Your files are housed in one of the most secure, most trusted e-commerce and business-to-business networks in the U. S. Unlike many file transfer solution providers whose service is hosted in networks supporting tens of thousands of domains and significantly more users, our network environment is much smaller, much more specialized, and therefore more secure and efficient.

Access to our data center is protected and restricted by RF-ID keycard and biometric scanning measures.

Motion, glass-breaker, and air temperature sensors are all integrated into a physical security system that provides additional protection for your data. The data in the facility is further secured by constant performance monitoring, a fully switched and segmented network, multiple uplink connections to redundant connections from the access layer on up using STP and Etherchannel technologies, redundant Cisco routers running the BGP(4) protocol to ensure optimal, balanced traffic routing, and HSRP hot fail over to ensure no connectivity loss in event of router failure.

Data and file integrity is further enhanced by a fiber optic SONET Ring which provides redundancy and protection from breaks, multiple OC-12 connections to leading national providers, low-circuit utilization that allows for high traffic peaks and/or partial connectivity losses without performance degradation, and connectivity diversified through multiple facility inputs.

Your files are protected from power outages and fire as well, using an inline, integrated UPS backup systems, a hospital-grade diesel fuel power generator (for quality of line power) which can run for 3 days without refueling and does not require shutdown for refueling. In time of non-use the generator is tested at full power output at least once every 7 days. We also make use of the FM-200 gas fire suppression system to extinguish fires without the damage that can be caused by water or dry chemical systems.

Remote access of servers and data exchange is limited to 3 ports: SSL, SSH, and HTTP. Firewalls examine every packet that crosses the firewall context and every login and data request is first passed through best-practices and audited verification code, which ensures that the request is correctly authorized for the action requested.

Data redundancy is ensured by both a realtime mirrored, RAID SATA II configuration for all sites and their files, as well as an incremental and full backup system that can restore on demand up to 14 days of cumulative data sessions and configurations.

### **As part of our Privacy Statement, the following is intended to inform our customers, prospects, and associates:**

Applied Answers, Inc. is the sole owner of information collected on this site, save and except your files and information that are transferred or stored using our site or systems, which are and remain your sole property. We will not sell, share, or rent this information to others in ways different from what is disclosed in this statement. We collect information from our users at several different points on the FileGenius web site.

## Privacy Statement

To subscribe to FileGenius, organizations must complete a registration process either on the FileGenius web site or by telephone or email. During registration, you must provide contact information (such as name and email address) for at least one person at your organization. We use this information to contact you about the services on our site to which you subscribe, register for a free trial, or in which you otherwise express an interest. Credit card information is also required during registration (but not to sign up for a free trial). If you cannot provide credit card information, Applied Answers, Inc. will attempt to accommodate your organization with alternative billing and payment options.

We reserve the right to contact users who sign up for a free trial, or begin the signup process for a free trial, to assist with the registration process and/or gain feedback about the system.

Once an organization creates a subscription account for FileGenius site, that organization can optionally create accounts for employees, clients, customers, and other associates. To create an account for any user, it's necessary to provide a username or ID, their email address, and their first and last names. Other information requested by the FileGenius user creation form is optional.

Emails from the FileGenius support staff may be sent in the case of important notifications. These emails will be sent only to owners and administrators or other designated, registered users of the account.

If you no longer wish to receive any communications from Applied Answers, Inc. about FileGenius or other products and/or services, you may opt-out by emailing your request to [custservice@filegenius.com](mailto:custservice@filegenius.com), or you may contact us at 888.753.2245, ext. 702 or write to us at 4850 Golden Pkwy., Suite 408, Buford, Georgia, 30518.

We use a third-party contractor (Authorize.net®) to process credit card transactions. This organization is prohibited by law and contract from using your personal information for any other purpose than billing your account. Additionally, we use third-party software for web analytics to analyze usage patterns on the FileGenius sales site. No personally identifiable information is included in the FileGenius site analytics and NO analytics are collected from your file transfer site.

Our third-party contracts prohibit these vendors from using any of your personal information for their own purposes, and they are required to maintain the confidentiality of the information we provide to them. We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required under the law. For example, we may be required to disclose personal information to cooperate with regulators or law enforcement authorities, to comply with a legal process such as court order, subpoena, search warrant, or law enforcement request.

We use a variety of technologies on the FileGenius site and file transfer sites. Among these are cookies — functional information devices set, in your browser, when visiting a web site. Our file transfer sites set NO cookies that store personal information and we do not allow cookies to store passwords. We do use dynamic, temporary session cookies, automatically deleted once you close your web browser. They are required to validate and integrate various file transfer functions. Session cookies are required to use the FileGenius application, thereby requiring your browser to accept cookies, for this reason only, while using the file transfer site.

We do not store any personally identifiable information in cookies (except for your User Name if you elect for the site to remember your User Name). The system, however, may employ unique identifiers in cookies to help map usage to a User Name, which in turn ties to data in the system's internal databases. The system also tracks activity on file transfer sites through log files stored on Applied Answers, Inc. web servers. The system collects information such as IP address and information associated with that IP address. We do not collect, track, or store information on visitors to our sales web site unless you should purchase file transfer services and we are obligated to collect information necessary to establish your site and account. No credit card information is stored in our systems but passed directly through to the credit card processor.

## Privacy Statement

If you visit the FileGenius sales site and then subsequently subscribe to FileGenius, the system's database may associate transaction and log information with personally identifiable information about your account such as name and contact information. This information is kept in our internal databases only and is not shared with third parties. None of this information is passed through to or shared with our Analytics function or vendor.

If you use the FileGenius application the internal database tracks your file transfer history as well as other transactions that may occur on your file transfer site. This information is used to create transaction reports for your use as well as for support purposes to help troubleshoot problems that you may have with the system. Small portions of this information may also be viewable by your administrators, employees, and/or clients who have access to your account for purposes you deem necessary and have been bestowed by way of the granular user permissions assigned by the site's administrator(s).

We take care to reinforce the importance of our web site visitors' security and privacy among our employees and associates. Our employees are trained and required to safeguard your information and, using physical, electronic and procedural safeguards, we restrict access to personal information to those employees and associates for business purposes only. Additionally, we use internal and external resources to review the adequacy of our security procedures.

If we decide to change our privacy policy, we will post those changes to this privacy statement, link to it from our home page ([www.filegenius.com](http://www.filegenius.com)), and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we choose to disclose it.

We reserve the right to modify this security and privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you by email, or by means of a notice on the FileGenius home page.

### **Questions or Additional Information:**

If you have questions regarding this document or wish to obtain additional information please contact us at 888.753.2245, ext. 701 or email us at [custservice@filegenius.com](mailto:custservice@filegenius.com).