1. ACKNOWLEDGEMENT AND ACCEPTANCE OF TERMS

The KonTerra Group, LLC (“KonTerra”) is committed to protecting your privacy. This Privacy Statement sets forth our current privacy practices with regard to the information we collect when you or your computer interact with our website. By accessing www.konterragroup.net, you acknowledge and fully understand KonTerra’s Privacy Statement and freely consent to the information collection and use practices described in this Website Privacy Statement.

2. PARTICIPATING MERCHANT POLICIES

Related services and offerings with links from this website, including vendor sites, have their own privacy statements that can be viewed by clicking on the corresponding links within each respective website. Online merchants and others who participate in KonTerra services are encouraged to participate in industry privacy initiatives and to take a responsible attitude towards consumer privacy. However, since we do not have direct control over the policies or practices of participating merchants and other third parties, we are not responsible for the privacy practices or contents of those sites. We recommend and encourage that you always review the privacy policies of merchants and other third parties before you provide any personal information or complete any transaction with such parties.

3. INFORMATION WE COLLECT AND HOW WE USE IT

KonTerra collects certain information from and about its users three ways: directly from our web server logs, cookies, the user, including in response to surveys and questionnaires and content voluntarily shared in forums.

a. Web Server Logs.

When you visit our website, we may track information to administer the site and analyze its usage. Examples of information we may track include:

- Your Internet protocol address.
- The kind of browser or computer you use.
- Number of links you click within the site.
- State or country from which you accessed the site.
- Date and time of your visit.
- Name of your Internet service provider.
- Web page you linked to our site from.
- Pages you viewed on the site.

b. Use of Cookies
KonTerra may use cookies to personalize or enhance your user experience. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. Hence, this simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalized functionality.

KonTerra reserves the right to share aggregated site statistics with partner companies, but does not allow other companies to place cookies on our website unless there is a temporary, overriding customer value (such as merging into konterragroup.net a site that relies on third-party cookies).

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you reject cookies by changing your browser settings, then be aware that this may disable some of the functionality on our website.

c. Personal Information of Users

Visitors to our website may be permitted to register for certain services such as a weekly email. When you register, we will request some personal information such as name, address, email, telephone number or facsimile number, account number and other relevant information.

We will not disclose personally identifiable information we collect from you to third parties without your permission except to the extent necessary including:

- To fulfill your service requests for products or services.
- To protect ourselves, our customer or our vendors from liability or to defend our rights, including investigations of fraud or misconduct.
- To third parties who have agreed in writing to maintain such information in confidence and use such information solely in performance of services to us.
- To respond to legal process or comply with law, including subpoenas.
- To entities under common ownership or control with us or to our owners, or
- In connection with a merger, acquisition, or liquidation of KonTerra.

How do I withdraw my consent?
If after you opt-in or after having not initially taken an opportunity to opt-out, you change your mind, you may withdraw your consent for us to contact you, for the
continued collection, use or disclosure of your information, at any time, by contacting us at info@konterragroup.net.

4. USE OF WEB BEACONS OR GIF FILES

KonTerra web pages may contain electronic images known as web beacons – sometimes also called single-pixel gifs – that allow KonTerra to count users who have visited those pages and to deliver co-branded services. KonTerra may include Web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon.

Some of these web beacons may be placed by third party service providers to help determine the effectiveness of our advertising campaigns or email communications. These web beacons may be used by these service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our service providers to learn which advertisements and emails bring you to our website and how you use the site. KonTerra prohibits web beacons from being used to collect or access your personal information.

5. ACCESSING WEB ACCOUNT INFORMATION

We will provide you with the means to ensure that personally identifiable information in your web account file is correct and current. You may review this information by contacting us by sending an email to info@konterragroup.net.

6. DO NOT TRACK

We have not implemented any technology that would effectively recognize do-not-track signals and note that some content available on our Site is made available through relationships with third party providers who we do not control and who may have collect and/or disclose personally identifiable information.

7. HOW TO CORRECT, UPDATE, OR DELETE YOUR INFORMATION

If you would like to: access, correct, amend or delete any personally identifiable information we store about you, register a complaint, or simply want more information, contact us at info@konterragroup.net.

8. HOW WE PROTECT INFORMATION

We use commercially reasonable procedures to protect the personal information that we collect from you against loss, theft and misuse, as well as unauthorized access,
disclosure, alteration and destruction. We have developed and implemented and continue to maintain and monitor a written information security program applicable to all records containing personal information. This security program is appropriate to the size, scope and type of our business, the resources available to us, the amount of stored data, and the need for security and confidentiality of the personal information we store. No security system is impenetrable. We cannot guarantee the security of our databases or the security during transmission to us of the information you supply over the Internet. You can help us by taking precautions to protect your personal information when you are on the Internet and only disclose information that you want made public. Change your passwords often using a combination of letters and numbers and make sure to use a secure web browser.

For the purposes set out in this Privacy Policy, personal information may be transferred to, processed, stored and accessed by us, our affiliates and third parties in the United States and in other jurisdictions where we or they operate. Courts and other authorities in these jurisdictions may, in certain circumstances, be entitled to access your personal information. By using the website, you consent to this transfer, processing, storage and access of your personal information in and/or outside of the jurisdiction in which you reside.

9. **AGGREGATE DATA**

We may share and publicize aggregate and/or de-identified information shared with third parties and the public.

10. **CHILDREN UNDER 13**

We do not specifically market to or knowingly collect personal information from children under 13 for marketing purposes. Because some information is collected online, it may not appear to be the personal information of a child under 13. If a child under 13 submits personal information to us and we learn that the personal information is the information of a child under 13, we will attempt to delete the information as soon as possible. If you are under 13, please do not register for any of our services or provide us any information about yourself (such as your name, email address or phone number).

11. **CALIFORNIA ONLINE PRIVACY PROTECTION ACT**

As required by the California Online Privacy Protection Act (“California Act”) and the California Business and Professions Code, this Privacy Policy identifies the categories of personally identifiable information that we collect through our website about individual consumers who use or visit our website and the categories of third-party persons or entities with whom such personally identifiable information may be shared.
Depending on the visitor’s activity at our website, certain “personally identifiable information” (as that term is defined in the California Act) may be collected, in addition to information set forth in other sections of this document. For purposes of the California Act, the term “personally identifiable information” means individually identifiable information about an individual consumer collected online by us from an individual and maintained by us in an accessible form, and may include any of the following: (1) a first and last name; (2) a home or other physical address, including street name and name of a city or town; (3) an email address; (4) a telephone number; (5) any other identifier that permits the physical or online contacting of a specific individual; and (6) information concerning a user that the web site collects online from the use, and maintains in personally identifiable form, in combination with an identifier described within this Privacy Policy.

12. CHANGES TO THIS STATEMENT

KonTerra has the discretion to occasionally update this privacy statement. When we do, we will also revise the “updated” date at the top of this Privacy page. We encourage you to periodically review this privacy statement to stay informed about how we are helping to protect the personal information we collect. Your continued use of the service constitutes your agreement to this privacy statement and any updates.

13. TRANSLATIONS

This Privacy Policy is executed in English. You agree and acknowledge that you have reviewed this Privacy Policy in English. To the extent that any translations of this Privacy Policy are provided, they are solely for convenience and is of no binding effect. The English language version of this Privacy Policy shall control.

14. CONTACTING US

If you have questions regarding our Privacy Statement, its implementation, failure to adhere to this Privacy Statement and/or our general practices, please contact us at info@konterragroup.net or send your comments to:

The KonTerra Group, LLC

Attention: Privacy Statement Personnel

700 12th Street NW, Suite 700

Washington, DC 20005
KonTerra will use commercially reasonable efforts to promptly respond and resolve any problem or question.