

SCARRITT GROUP, INC. PRIVACY POLICY

Introduction

At Scarritt Group, Inc. "Scarritt" we are committed to safeguarding the privacy of our customers. We will never sell, release, or transmit customer information externally for any purpose, other than with approved business partners, in secure circumstances, and only then for the benefit of creating successful meeting experiences for our clients. All internal information is gathered and retained only for the duration of retained services, except as defined by regulatory requirements, and then based upon the regulatory retention period, and/or client request for data archival.

Website Access

Scarritt Group provides a series of websites designed to provide clients with information and services, including, but not limited to, Available Service Menus, Request for Information or Proposal, Conference Registration, Travel Arrangements, Virtual Conference Center Access, Informational Portals, and Learning Management Systems. We respect the privacy of your Personal Information (any information related to an identified or identifiable individual), and only collect volunteered information, and then only in relation to the provided service to the client.

The Privacy Statement describes how we collect, use, protect, and disclose the Personal Information that you share with us online and offline, unless otherwise provided pursuant to an informed consent signed by you. Scarritt websites that display this Privacy Statement are committed to only collecting, maintaining, and securing your Personal Information in accordance with the terms of this statement. We encourage you to read this Privacy Statement in its entirety before submitting any information. By using any Scarritt website or portal, submitting or requesting information, you acknowledge that you understand and agree with the provisions of this Privacy Statement.

Use of Cookies and Other Tags

Where permitted by law, non-Personal Information and data may be automatically collected through the standard operation of Scarritt's Internet service or through the use of "cookies" or "internet tags" and other similar techniques. This type of anonymous information allows Scarritt to evaluate customer interest in its websites and perform other market research activities. Cookies are small text files a website can use to recognize repeated usage, facilitate the user's access to and use of the site, and allow a site to track usage behavior and compile aggregate data that will allow content improvement and targeted advertising. Cookies are programs that come into a user's system but do not damage files. Generally cookies work by assigning a unique number to the user that has no meaning outside the assigning site. If a user does not want information to be collected through the use of cookies, there is a simple procedure in most browsers that allows the user to deny or accept the cookie feature; however, users should note that cookies may be necessary to provide the user with certain features (e.g., customized delivery

of information) available on Scarritt's websites. Scarritt also may collect and store the name of the domain and host from which you access the Internet; the Internet protocol (IP) address of the computer you are using; the browser software you use and your operating system; the date and time you access our website; the Internet address of the website from which you linked directly to our website.

Do-Not-Track Signals

Some web browsers that you use may transmit "do-not-track" signals to websites with which the browser communicates. As of the Effective Date of this Privacy Statement, an industry standard on how to respond to these signals has not yet been established. Since industry standards are still evolving, Scarritt will not separately respond to or take any action with respect to "do-not-track" configurations in your internet browser. Scarritt will reassess its approach based upon future procedures, but will respond with similar guidelines, based upon only gathering information based upon providing services to existing clients.

Children's Online Privacy

Scarritt's websites are not directed or intended for children. The services offered on our websites are designed for individuals who are 18 years of age or older. If your child has submitted Personal Information and you would like to request that such information be removed, please contact privacyofficer@Scarrittgroup.com. For more information about protecting the privacy of children online in the United States under the Children's Online Privacy Protection Act, please see <http://www.ftc.gov/ogc/coppa1.htm> (last accessed January 2013).

Links and Third-Party Websites

Many of Scarritt's websites may contain links or references to third-party websites as a convenience to you. This Privacy Statement does not cover the practices of these websites. Accessing these sources requires that you leave Scarritt's websites. Scarritt does not control the content of these third-party websites and is not responsible for the privacy practices of these websites. Please review the privacy policies on each website that you visit.

Data Integrity/Purpose Limitation and Security

Scarritt employs industry standard Information Systems Security Methods to securely and reliably store data, including, but not limited to, the use of Firewalls, Routers and Switches, Network Intrusion Detection Devices, Virtual SANs, Segregated VLANs, and Encrypted VPN Tunnels between Locations. All data is stored on Scarritt owned and secured systems, and is accessed internally, and through authorized remote VPN Connections only. The only exception to this policy is for backup data accessible on-site by Project Managers, as a backup data access. All Scarritt Employees accessing storing Scarritt data remotely are required to store it exclusively on supplied biometric data drives, accessible only through individual fingerprint secured access. Project Managers are responsible for the download and upload of secure files to the core Scarritt System.

Scarritt endeavors to take every reasonable steps to ensure that Personal Information collected is relevant for the intended purposes of processing and reliable for its intended use, accurate, complete, and current. We use commercially appropriate technical, administrative, and physical safeguards intended to protect data that pertains to you from loss, misuse, or alteration. In addition, we take steps designed to ensure that our safeguards take into account new known threats. However, no organization can guarantee the absolute security of Personal Information 100 percent secure or free of errors. Accordingly, we caution you to guard your own computer and password against unauthorized access by others.

Scarritt will not collect Personal Information about you unless you provide it voluntarily. You can access any of our public websites without telling us who you are or providing us with any Personal Information. Depending on which website you visit, you may not be able to receive certain information unless you agree to provide us with Personal Information. For example, we may collect information from physicians and other healthcare providers who register on our websites in order to verify their identity. The type of information collected from you is based upon the specific program and/or services requested, as indicated at the time of your registration. The information that we may ask you to provide may include your first and last name, mailing address, age, birth date, email address, licensure, and title. We also provide opportunities to contact Scarritt to ask questions or provide comments, ideas and/or suggestions. When you communicate with us or request a response, we may request additional contact information; in such cases, we will notify you as to why we are asking for that information and how it will be used. It is completely up to you as to whether you want to provide such information. We may also collect Personal Information to analyze visits to our website and learn about the interests of our visitors in the aggregate and also on a personal level. We may personalize and customize this website with references to products, services, or educational information that we believe may be of interest to you based on your previous interactions, information you have provided to us, or information about you that we have collected from third-party sources. Your interests could come from several sources, including your browsing activity and your response to online advertisements. In such circumstances, third parties collect and store data about your interests and online activity. Scarritt endeavors to limit the collection and processing of Personal Information to what is necessary to fulfill the purposes of the client's services. Scarritt will also endeavor to request your consent to collect your Personal Information when you register for a program or service. We will also offer you the option to opt out of receiving further communications from Scarritt ("opting out" or "unsubscribing") if you later decide that you no longer want to participate in that program or receive additional information from us.

Third Party Data with Business Partners

Scarritt will only share information with Third Parties who are contractual business partners, and who have signed agreements with Scarritt, requiring that they abide by our data use policy, including, but not limited to, our requirements of not selling, transferring, or any use of the data, other than for the contracted purpose of providing goods and services to our clients, as well as the requirement that they will guarantee the destruction of user data upon completion of the goods and services provided.

Any transmission of Personal Information with any Third Party entity will be conducted exclusively through secure channels, and with industry standard encryption levels.

Recourse, Enforcement and Liability

Scarritt has implemented mechanisms to verify its ongoing compliance within the organization and among our business partners. Any party that violates policy internally will be subject to disciplinary methods, up to and including termination of employment. Any incident of violation of the policy with our business partners will result in consequences, including, but not limited to dissolution of contract, financial penalties, and all available legal recourses.

If you feel that Scarritt is not abiding by the terms of this Privacy Statement, or have any information regarding issues of compliance with the Policy please contact privacyofficer@scarrittgroup.com.

Updates to Privacy Statement

The foregoing terms are effective as of May 25, 2018. Scarritt may update this Privacy Statement from time to time based on, among other things, changes in applicable laws, development of new websites, and advances in technology. Scarritt reserves the right to modify, add, or remove portions of this Privacy Statement at any time at our sole discretion. If we decide to revise this Privacy Statement, we will post the revised Privacy Statement at this site. We encourage you to review the Privacy Statement each time you visit our site. This Privacy Statement is not intended to and does not create any contractual or other legal rights in or on behalf of any party.

How to Contact Us

If you have any questions about our Privacy Statement, please address all correspondence to email at privacyofficer@scarrittgroup.com.