

EcSELL, Inc. -- PRIVACY POLICY

The EcSELL, Inc. ("EcSELL") is committed to protecting your personal information. This Privacy Policy (the "Policy") explains how EcSELL collects and uses the personal information that you provide online to one of our EcSELL websites (the "Site" or "Sites"), as well as offline when participating in any EcSELL Program. (EcSELL Institute is our market name)

You should read this Policy before you submit any personal information to us. By using our Sites or registering your interest in EcSELL online, you consent to the collection and use of your personal information as outlined in this Policy. If you do not agree with the content of this Policy, you should refrain from using our Sites.

1. WHO WE ARE

EcSELL, which owns and operates the Sites, has its principal place of business at 3500 S. Hope Ct, Lincoln, NE 68502, more information about EcSELL and its network of Programs can be found at <http://www.EcSELLinstitute.com/>.

2. PERSONAL INFORMATION WE COLLECT

In General. EcSELL may collect and store any personal information you enter on the EcSELL website or provide to EcSELL in some other manner. Personal information is data that identifies you, or that can be combined with other information to identify or contact you, and includes (but is not limited to) your name, business or personal email address, job title, organization, organization's physical address, direct telephone number, photograph, biographical details and profiles regarding your business such as type of business, number of employees, sales, revenues, etc. You are not obligated to provide EcSELL with any personal information, although you may need to provide some information to register as a member, submit a question, or engage in other transactions on the EcSELL Site. EcSELL will strive to limit the type of personal information that we collect to information that helps us accomplish our goal of providing first-class services for the benefit of the EcSELL existing and prospective Members ("Members"). If you are Member and access the restricted, Members-only areas of our Sites, EcSELL may collect additional information relating to your participation in EcSELL Programs.

EcSELL also may obtain information about your access and use of EcSELL research materials, decision-support tools, and other online and offline offerings. Information from other sources. EcSELL also may periodically obtain both personal and non-personal information about you from other sources. Examples of information EcSELL may receive includes updated contact information and additional demographic information. Please note that EcSELL may have previously collected personal information relating to you at the time you or your organization enrolled in an EcSELL Program or Programs, as well as in the course of allocating and issuing to you your unique ID and password to access the Members-only areas of the EcSELL Sites ("Information Collected Automatically"). When you visit EcSELL website, EcSELL automatically collects and analyzes certain information about your computer. This information includes but may not be limited to the IP address used to connect your computer to the Internet, information about your browser type and language, the date and time you are accessing the EcSELL Site, the content of any undeleted cookies that your browser previously accepted from EcSELL, and the referring website address ("Use of Cookies and Other Technologies"). EcSELL uses various technologies to collect information about your activities on the EcSELL Site.

- Cookies. When you visit the EcSELL website, EcSELL may assign your computer one or more "cookies." A cookie is a small text file that contains information that can later be read by EcSELL to facilitate your access to the EcSELL site and personalize your online experience. For example, whenever you sign into the EcSELL site, EcSELL will record your user ID in a cookie file on your computer. If applicable, we may also record your password in this cookie file, if you checked the box entitled "Save this password for automatic sign-in." Also, through the use of a cookie, EcSELL may automatically collect information about your online activity on the EcSELL Site, such as the web pages you visit, the links you click, and the searches you conduct. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that you may not be able to sign in or use some of the interactive features offered on the EcSELL website.
- Other Technologies. EcSELL may use standard Internet technology, such as Web beacons (also called clear GIFs or pixel tags) and other similar technologies, to deliver or communicate with cookies and track your use of the EcSELL Site. We also may include web beacons in e-mail messages or newsletters to determine whether messages have been opened and acted upon. The information EcSELL obtains in this manner enables us to customize the services EcSELL offers and measure the overall effectiveness of EcSELL's online content, advertising campaigns, and the products and services EcSELL offers through the Site.

Information Collected by Third Parties. Third parties, such as vendors, advertising entities, and business partners, may use cookies and other technologies (such as Web beacons) to collect information about your online activities. The purposes for collecting this information includes: to measure usage of our site; to analyze, modify, and personalize advertising content on our Sites; and to provide ads about goods and services EcSELL hopes will be of interest to you. We do not have access to or control over cookies or other features these third parties may use, and the information practices of these third parties are not covered by this Privacy Policy. Some of these third parties may be third-party network advertisers that offer you the option of not having this information collected.

3. HOW WE USE THE INFORMATION WE COLLECT

In General. EcSELL uses the information that EcSELL collects about you for the following purposes:

- to respond to inquiries that you submit to EcSELL about your membership via the online "contact us" feature and determine which Programs and services will help you achieve your business goals;
 - to send you membership details and information about EcSELL Programs and services that you have requested from EcSELL;
- to administer your membership and facilitate your access to and provide you with EcSELL resources, decision-support tools, and other materials available to you through your Program subscription;
- to communicate with you about surveys, marketing, promotions, executive-oriented events, educational forums, and other exclusive opportunities offered by EcSELL, including information about other EcSELL Programs in which you may be interested;
- to engage in research and analysis in order to maintain, protect and improve our Programs and services, as well as develop new services;
 - to enhance the EcSELL network and EcSELL products and services; and
 - to ensure the technical functioning of the Sites.

Through the online component of EcSELL's Network -- Members can tap into EcSELL's membership directory and locate senior executives best able to help them deal with specific questions and challenges. To participate in this service, Members are asked to create an online experience profile, which includes information about their job and title, and then enables other senior executives participating in this service to determine whether the Member's background and expertise might make them a useful contact on a particular issue. Based on this determination, one Member might use another Member's information to contact that Member to obtain the benefit of their expertise.

4. CHOICES ABOUT THE USE OF YOUR INFORMATION

EcSELL believes that it is important that individuals are given the opportunity to exercise choice with respect to how their personal information is collected and used. If we propose to use your personal information for any purposes other than those described in this Policy or any service-specific privacy notices, we will allow you a convenient way to opt-out of such further uses.

Marketing Communications: EcSELL hopes you find value in the communications that EcSELL provides, and we will respect your wishes not to receive marketing communications. Please note that EcSELL will continue to send you member services emails and other service-related communications regardless of any such request. These service-related communications are an integral part of the EcSELL Programs to which you subscribe. Rest assured that EcSELL will not share your information and personal details with other non-agent third parties for promotional or marketing purposes, without giving you a choice about such sharing.

Other Choices: You can, if you wish, contact EcSELL and request access to your personal information. EcSELL also will strive to comply with your wishes with respect to the handling of your personal information in all other cases, provided that this does not interfere with the provision of services by EcSELL to you or the legal or regulatory obligations binding on EcSELL. And, you are free to decline to provide personal information to EcSELL, although this may mean that you are unable to enroll in EcSELL Programs or continue to use the EcSELL services.

5. DISCLOSURES OF PERSONAL INFORMATION

EcSELL may share your personal information with other companies or individuals in the following instances:

- When EcSELL engages service providers and third-party agents to process personal information on behalf of EcSELL. When EcSELL does so, EcSELL requires that these service providers implement adequate technological and organizational security measures before they can receive any personal information from EcSELL.
- For legitimate business purposes connected with the provision of EcSELL goods, services, and benefits for EcSELL customers. Where information is shared with a third party for a legitimate business purpose, EcSELL will seek reasonable assurances from that third party that the personal information will be processed for legitimate reasons and appropriately protected.
- In response to subpoenas, court orders, or other legal process; to establish or exercise EcSELL's legal rights; to defend against legal claims; or as otherwise required by law. In such cases EcSELL reserves the right to raise or waive any legal objection or right available to EcSELL.
- When EcSELL believes it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of EcSELL, our customers or Member, or others; and in connection with our Terms of Service and other agreements.
- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Please note that, when you become an EcSELL Member, EcSELL may make information about you (including contact and institutional information) available to other Members through EcSELL and other online and offline services. We also may share aggregate or anonymous information with third parties, including advertisers, investors, and partners.

6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

EcSELL operates the Sites in the United States and, depending on your country of residence, the submission of personal information to our Sites may involve some transfer of personal information to the United States. In addition, EcSELL may transfer personal information to any of EcSELL's affiliate company's. You should be aware that privacy laws in the United States may not provide protections equivalent to those of your country of residence.

EcSELL Members also should be aware that, by participating in our online and offline peer networks and services and Annual Executive Retreats and other conferences, information about them may be made available to other EcSELL Members throughout the world to facilitate intelligence-sharing across our membership. If you are uncomfortable with this transfer of your information, you should not use those services. Please refer to any more-detailed privacy notices governing such services for additional information about how they may affect your privacy.

7. INFORMATION INTEGRITY

EcSELL processes personal information only for the purposes for which it was collected and in accordance with this Policy or any service-specific privacy notices. EcSELL takes reasonable steps to ensure that the personal information EcSELL processes is accurate, complete, and current; however, EcSELL does not guaranty the accuracy of such information. Where EcSELL receives any personal information directly from the EcSELL Members, EcSELL relies upon the EcSELL Members to provide EcSELL with information that is accurate and correct, and to inform EcSELL when the information becomes incorrect or out-of-date.

8. ACCESS AND CORRECTION OF PERSONAL INFORMATION

You can request access to any personal information that EcSELL holds about you and ask EcSELL to correct any personal information which may be inaccurate, except where the law requires otherwise. To access, correct or raise inquiries concerning your personal information in our possession, please contact:

Kerstin Olson, 402-805-4805 or email EcSELL at: kolsolon@EcSELLinstitute.com

In some cases, EcSELL Members can directly access their online profiles and other personal details, enabling them to amend, update or add information by themselves at any time by logging into the relevant Program webpage.

9. INFORMATION SECURITY

EcSELL has implemented technical and organizational security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of personal information. EcSELL reviews the EcSELL systems regularly to ensure that the security and integrity of personal information in possession of EcSELL is not compromised. Unfortunately, no data transmission over the Internet can be guaranteed to be entirely secure, and EcSELL assumes no liability for any damage suffered by you caused by the interception, alteration, or misuse of information during transmission.

Within EcSELL, we restrict access to personal information to employees, contractors, and agents who need to know that information in order to operate, develop, or improve the EcSELL Programs and services. EcSELL binds the EcSELL third-party agents to contractual controls to ensure that they apply suitable protections to any personal information they access or receive from EcSELL.

Please note that the effective security with respect to the EcSELL Sites depends, in part, on the EcSELL Members ensuring that any IDs and passwords that they have been issued by EcSELL are kept confidential and secure and that Members adhere to the restrictions on password and ID-sharing set forth in our Terms of Use.

10. OTHER WEBSITES

To provide increased value to users of the EcSELL Sites, EcSELL may provide links to other websites or resources that are not part of the EcSELL network of Programs. EcSELL does not exercise control over these websites or their privacy practices.

11. CHILDREN

The EcSELL Sites contain business-related content and are specifically aimed at and designed for use by adults. EcSELL does not knowingly solicit or collect personal information from or about individuals under the age of 18 years. If EcSELL discovers that EcSELL has received personal information from an individual whom EcSELL believes to be under the age of 18, EcSELL will delete such information from our systems.

12. CHANGES TO THIS POLICY

This Policy may change from time to time. If EcSELL makes material changes to this Policy, EcSELL will post any Policy changes on this page. If EcSELL feels it appropriate, EcSELL will provide a more prominent notice (including, for certain services, email notification). Your continued use of the EcSELL Sites following such posts or notices will signal your acceptance of such changes.

- If you have any additional questions or concerns about this Policy, please feel free to contact us at 402-805-4805.

Last Updated: September 19, 2008