

PRIVACY POLICY

This Privacy Policy was last updated March 2014.

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Our Policy:

Welcome to the web site (the "Site") of SmartPerk Inc., DBA Aspire ("Company", "SmartPerk", "Aspire" "we", "us" and/or "our") This Site is operated by Aspire and has been created to provide information about our company and to provide services for collecting employee information to create user/employee profiles to provide custom tailored incentive packages to employees (the "Aspire Services" or "Company Services") to our Site users ("you", "your"). This Privacy Policy sets forth our policy with respect to information including personally identifiable data ("Personal Data") and other information that is collected from Site visitors.

Information We Collect:

When you interact with us through the Site, we may collect Personal Data and other information from you, as further described below:

Personal Data That You Provide Through the Site: We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, respond to one of our surveys, register for access to the Company Services or voluntarily provide personal data for use with certain Aspire Services. This data may include, by way of example, your name, email address, address, demographic data or payment card information. **By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data to this Site, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Aspire and the authorized third parties referred to herein located in the United States.**

Other Information:

Non-Identifiable Data: When you interact with Aspire through the Site, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. We may store such information itself or such information may be included in databases owned and maintained by Aspire's affiliates, agents or service providers. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Data is available or used in this process.

In operating this Site, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately.

For instance, our Site may set a cookie on your browser that allows you to access the Site without needing to remember and then enter a password more than once during a visit to the Site. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site's features.

Aggregated Personal Data: In an ongoing effort to better understand and serve the users of the Aspire Services, Aspire often conducts research on its customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and Aspire may share this aggregate data with its affiliates, agents and business partners. This aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Our Use of Your Personal Data and Other Information:

Aspire uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Company Services, we will use your Personal Data to provide you with access to such services and to monitor your use of such services. Aspire and its subsidiaries and affiliates (the "Aspire Related Companies") may also use your Personal Data and other personally non-identifiable information collected through the Site to help us improve the content and functionality of the Site, to better understand our users and to improve the Aspire Services. Aspire and its affiliates may use the data provided to us to contact you in the future to tell you about services we believe will be of interest to you. If we do so, each communication we send you will contain instructions permitting you to "opt-out" of receiving future communications. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our databases or mailing lists, please contact us as indicated below.

Any specific Personal Data provided to Aspire in connection with the Company Services will be used to provide the Services and custom tailor benefits. Service providers may be provided with Personal Data so that the service providers can better tailor and market their services to you. Service providers will not be able to reach out to individuals with this data UNLESS those individuals are using the Services.

If Aspire intends on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

Our Disclosure of Your Personal Data and Other Information:

Aspire is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data will not be part of the transferred assets.

Related Companies: We may also share your Personal Data with our Related Companies for purposes consistent with this Privacy Policy.

Agents, Consultants and Related Third Parties: Aspire, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

Legal Requirements: Aspire may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Aspire, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

Your Choices:

You can use the Site without providing any Personal Data. If you choose not to provide any Personal Data, you may not be able to use certain Services.

Exclusions:

This Privacy Policy does not apply to any Personal Data collected by Aspire other than Personal Data collected through the Site. This Privacy Policy shall not apply to any unsolicited information you provide to us through this Site or through any other means. This includes, but is not limited to, information posted to any public areas of the Site, such as bulletin boards (collectively, "Public Areas"), any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and Aspire shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

Children:

Aspire does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Site.

Links to Other Web Sites:

This Privacy Policy applies only to the Site. **This Site may contain links to other web sites not operated or controlled by Aspire (the "Third Party Sites").** The policies and procedures we described here do not apply to the Third Party Sites. The links from this Site do not imply that Company endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Social Media:

Through the Site, you may choose to access certain social media websites and services that are owned and/or controlled by third parties (including, without limitation, Facebook and Twitter) (such websites and services, collectively, the "Social Media Services"). When you elect to access and use the Social Media Services, you will be sharing your information (which will include personal information if you elect to share such information) with those Social Media Services. As with other Third Party Sites, the information that you share with the Social Media Services will be governed by the privacy policies and terms of service of the providers of such Social Media Services and not by the policies and procedures we describe here. You may also be able to modify your privacy settings with these Social Media Services to, for example, control what information the Social Media Services disclose to other entities, including Company. When you add Social Media Service accounts to the Company Services or log into the Site using your Social Media Services account, we will collect relevant information necessary to enable the Site to access that Social Media Service, however you will provide your login information, like your password, directly to such Social Media Service (and not to Aspire). As part of such integration, the Social Media Service will provide Aspire with access to certain information that you have provided to such Social Media Service, and we will use, store and disclose such information in accordance with this Privacy Policy and, if and to the extent applicable, the policies of such Social Media Services. However, please remember that the manner in which Social Media Services use, store and disclose your information is governed by the policies of the applicable Social Media Services provider, and, as a result, Aspire shall not have any liability or responsibility for the privacy practices or other actions of Social Media Services that may be enabled within and/or otherwise accessible through the Site.

Security:

Aspire takes reasonable steps to protect the Personal Data provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from this Site may not be secure. Therefore,

you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any Personal Data to Aspire via the Internet.

Changes to Company's Privacy Policy:

The Site and our business may change from time to time. As a result, at times it may be necessary for Aspire to make changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

Access to Information; Contacting Company:

To keep your Personal Data accurate, current, and complete, please update it through the Site or contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted via this Site.

Please also feel free to contact us if you have any questions about Company's Privacy Policy or the information practices of this Site.

If you have questions or concerns regarding this statement, you should first contact Customer Service via the 'Contact Us' tool, leaving your comments, questions or concerns.