



Final Version: 01/28/2005

The Capital Network Privacy Policy

This Privacy Policy (**Policy**) sets forth The Capital Network, Inc. (**The Capital Network, TCN, we, our, us**, etc.) policies regarding the collection and use of information relating to the TCN web site located at www.thecapitalnetwork.org (**Site**). When we refer to The Capital Network, TCN, we, our, or us, we mean our entire company, including our affiliates The Capital Network of New England and TCN Listing Service.

INFORMATION WE COLLECT

Personally Identifiable Information

Personally Identifiable Information (**Personal Information**) is information that can be used to identify or contact you, such as your name, e-mail address, telephone number or similar information. TCN only collects Personal Information that you choose to share with us, such as when (1) contacting us via the Site (by clicking on the "Contact Us" link at the top of each web page); (2) registering online for an events, forums, programs or courses; (3) registering as a member of TCN, whether as an investor or entrepreneur.

Registered Members

In order to become a registered member of TCN you must provide us with certain Personal Information, including your name, company name, designation, e-mail address, postal mail address, phone number, and fax number, along with payment information, which may include credit card information. We will use this Personal Information to review and verify your registration information. We may use your Personal Information to send periodic marketing or promotional notices, including notices about investor forums and upcoming meetings, or to notify you of any changes to this Policy. You can always opt-out of receiving these communications (except for communications necessary for your use of the Site) from us by following the "opt-out" procedures described below. We may also use your Personal Information to improve our marketing efforts, statistically evaluate Site usage, improve our Site or customize our Site's content, layout and services.

Usage Data

The Site automatically tracks certain information about your behavior while visiting the Site (**Usage Data**). We do not track the URL from which you arrive at the Site, and only track the next-visited URL if it is from a link specifically provided on the Site. We collect and store this aggregate information in order to measure the Site's performance and improve the Site's design and functionality. We may also share this aggregate information with third parties to illustrate how the Site is used and for other marketing purposes. If you are a registered member, we may use your Usage Data with or without your Personal Information, in order to measure the Site's performance and improve the Site's design and functionality.

Cookies

A cookie is a piece of data stored on the user's hard drive containing information about the user. Usage of a cookie is in no way linked to any Personal Information while on our Site. Cookies benefit our members by automating some log in procedures and helping personalize the Site automatically, without requiring your password. All secure and confidential information will require you to log in using your password.

Children

Our Site is not generally intended for use by children under the age of 13, and TCN does not knowingly collect Personal Information from children in this age group. If we become aware that a user under the age of 13 has registered as a member or is attempting to register as a member, we will notify the user that he or she is not eligible for registration. We will then expunge any related Personal Information from our records.

USE OF YOUR PERSONAL INFORMATION

Representation Regarding Accuracy

Any information you provide to TCN must be true, accurate, current, non-misleading, and consistent and relevant for the purpose for which you are providing the information. If you are a registered member, you must have the authority to provide the information submitted to and through the Site.

Disclosure of Information

TCN makes every reasonable effort to preserve user privacy. However we reserve the right to disclose Personal Information when required or permitted by law and we have a good faith belief that such action is necessary to comply with an appropriate law enforcement investigation, current judicial proceeding, a court order or legal process served on us, to enforce this Policy or other Site rules and policies, or to respond to claims that you are involved in activities that violate the rights of third parties.

Consent to Processing

By using our Site, or providing information to TCN, you understand and unambiguously consent to the collection, processing, transfer and use of the information in the United States and other countries and territories, for the purposes set forth in this Policy. You hereby consent to the collection, processing and disclosure by TCN of your Personal Information between TCN's Service Providers and affiliates in accordance with this Policy. For further certainty, any consent relating to a right to transfer information referred to in this paragraph shall be deemed to include your consent to the transfer of applicable Personal Information to the United States, which may have a different level of privacy protection than that available in your own country.

OPT-OUT CHOICES

To “opt-out” of (1) receiving communications from TCN (except for communications necessary for your use of the Site), (2) having your Personal Information disclosed to third parties for marketing purposes, or (3) any other consent previously granted for a specific purpose concerning your Personal Information, send an e-mail or letter by standard mail to the address found on the Contact Us page of the Site. We will comply with a valid request for removal within 96 hours of receipt of the e-mail or letter.

REVIEWING OR CHANGING INFORMATION

If you are a registered member, you may request to review, change or delete Personal Information previously provided to us by modifying your profile at the “Edit Profile” screen. Requests for changes or deletions of your Personal Information should be made by you directly.

THIRD PARTY WEB SITES

This Policy applies only to www.thecapitalnetwork.org and www.tcnlisting.org. This Site contains links to other web sites. Please be aware that we are not responsible for the privacy practices of such other web sites. We encourage our users to be aware when they leave our Site and to read the privacy statements of each and every web site that collects personally identifiable information.

SECURITY

We intend to protect your Personal Information and to maintain its quality. We implement appropriate security measures and processes, such as employing 128-bit Secure Session Layer (SSL) encryption for all credit card transactions during submission of online payments. www.tcnlisting.org is hosted in a shared server in a co-location facility, using industry standard security practices, while www.thecapitalnetwork.org is hosted in a dedicated server in a co-location facility using industry standard security practices. The servers reside in a secured area, with active Intrusion Detection System (IDS) monitoring, managed firewall services and a backup data system.

Although we use industry-standard practices to protect your privacy, we cannot guarantee, and you should not expect, that your Personal Information or private communications will remain private under all circumstances.

DISCLAIMER

WE DISCLAIM ANY AND ALL LIABILITY FOR ANY INFORMATION YOU SUBMIT TO OR RECEIVE FROM TCN. WE ALSO DO NOT ASSUME ANY RESPONSIBILITY OR LIABILITY FOR YOUR OWN OR A THIRD PARTY’S USE OR MISUSE OF INFORMATION TRANSMITTED OR RECEIVED DURING USE OF THE SITE.

CHANGES TO THIS POLICY

TCN may, in its sole discretion, update this Policy at any time and from time to time, by posting the amended Policy on this Site. The amended Policy shall be effective upon posting, and your access to or use of the Site following an update shall be deemed consent to the revised Policy. If you are registered member, amendments to this Policy may be sent to you via e-mail or such other form of communications as you have requested. We urge each visitor to refer back to this page regularly and especially prior to providing or updating any Personal Information. This Policy may not be otherwise amended without the written consent of TCN.

CONTACTING US

The Site is maintained by the TCN Staff. If you have any questions or comments about our privacy practices, would like to stop receiving information from TCN, or would like to correct or update Personal Information provided to TCN through its Site, please contact us via e-mail at info@thecapitalnetwork.org, or via standard mail, as follows:

**10 Tower Office Park
Suite 521
Woburn, MA 01801**

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