

Proxor Web Site Privacy Statement

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Overview

This is the Privacy Statement for this web site, which is owned and administered by Proxcer Limited (Proxor). This Privacy Statement addresses the collection, retention and sharing of personal information obtained from users of this web site.

Proxor operates a proprietary system that evaluates software development skills through the administration of exams to individual exam takers. An exam is administered to an exam taker upon presentation of a voucher at a testing center operated by a third party Proxor Exam Partner. Vouchers may be purchased directly from Proxor or purchased or otherwise transferred from Proxor Exam Partners. Proxor scores exams administered by Proxor Exam Partners and provides the scores directly to exam takers. In addition, when vouchers are purchased by a Proxor Exam Partner for particular exam takers, Proxor also provides those scores to that Proxor Exam Partner. Exam takers, Proxor Exam Partners and their personnel are the principal users of this web site.

The primary purposes of this web site are to:

- enable exam takers to create user accounts, purchase vouchers from Proxor, register for exams and obtain exam scores; and
- enable Proxor Exam Partners and their personnel to create user accounts, confirm that they have administered an exam to a particular exam taker, and transfer vouchers to other Proxor Exam Partners.

Information Proxor collects and how it is used

Email address and password. In order to transact with this web site, each web site user must create a new user account. When creating an account, users will be required to provide an email address, which will serve as a “user name,” and to set a password. Proxor may also use the email address provided to communicate with the user regarding the user’s account.

Additional personal information of exam takers. When creating an account, an exam taker must provide additional personal information to complete a profile, which may include current address, level of education, prior employment and any prior certifications. Prior to taking an exam, exam takers may be required to provide biometric identification information (e.g., photographs or fingerprints) at a testing center. The personal information of the exam taker, including biometric information, will be linked to exam scores in the exam taker’s account and the account of any Proxor Exam Partner who purchased the vouchers used to take the exam (as further described below in “Exam scores”). By linking this information to the exam scores, Proxor, Proxor Exam Partners and potential employers can verify the identity of the person who took a particular exam and received a particular score. In addition, if an exam taker agrees, Proxor may contact an exam taker at the email address provided when a request from a potential employer matches the exam taker’s profile. This option is further discussed in *How Proxor shares personal information*.

Additional personal information of Proxor Exam Partner personnel. Personnel of Proxor Exam Partners that are involved in administering exams, including administrators and proctors, may be required

to provide additional personal information when creating an account or subsequently. This personal information may include biometric identification information (e.g., photographs or fingerprints), a current address, level of education and prior employment. Proxor uses this personal information to connect each administered exam to specific personnel responsible for its administration, in furtherance of Proxor's efforts to maintain quality control and deter cheating.

Exam scores. When an exam taker completes an exam, the results are submitted to Proxor by a Proxor Exam Partner for scoring. Proxor will store these scores and link them to the personal information of the exam taker on its server and will display them (1) in the exam taker's account and (2) in the account of any Proxor Exam Partner who purchased the vouchers used to take the exam. Exam takers and Proxor Exam Partners are able to access these scores by logging in to their account on this web site. To maintain quality control and deter cheating, Proxor also links exam scores to the accounts of Proxor Exam Partner personnel involved in the administration of the exam. These links are only visible to Proxor.

Purchases of vouchers by exam takers. When exam takers purchase vouchers through this web site, Proxor may temporarily store financial information supplied by the exam taker, including bank account or credit card information, and the details of the transaction. This financial information is used to facilitate, complete and verify purchases.

Transfers of vouchers by Proxor Exam Partners. When vouchers are transferred between Proxor Exam Partners, or from a Proxor Exam Partner to an exam taker, Proxor will record the user name of the transferor and transferee and link that information to a specific voucher. This linked information is used to confirm the authenticity and validity of vouchers and prevent fraud or error.

Web site activity. Proxor may keep track of some of the actions users take on this web site, such as editing profiles, transferring vouchers or viewing exam scores. Proxor may use activity information to help diagnose problems with this web site, analyze trends, administer and improve this web site, and for other similar purposes.

Device and browser information. When users access this web site from a computer, mobile phone, or other device, Proxor may collect information from that device about the user's browser type, location, and IP address. A device's IP address is not necessarily linked to personal information, but does distinguish a device from other devices that access this web site. Proxor may also use a device's IP address to identify a user as a distinct, though anonymous, visitor, for which the experience may be personalized during future visits.

Cookie information. Proxor may use "cookies," which are small pieces of data that Proxor may store for an extended period of time on a user's computer, mobile phone, or other device. Cookies help to make this web site easier for a user to use and can be used to detect and prevent fraud. Proxor may use cookies to store a user name (but never a password) or to confirm that a user is logged to an account. Users can remove or block cookies using the settings in a web browser, but in some cases the removal may impact the ability to use this web site.

De-identified information. Proxor may use de-identified exam scores to detect cheating and otherwise assess the exams and their administration. Also, Proxor may share aggregated de-identified exam scores or demographic information with Proxor Exam Partners and other third parties to help improve or promote its products and services. As no individual exam taker can be identified from de-identified information, Proxor does not consider this to be personal information.

When and how Proxor shares personal information

Trusted third parties. Proxor may share a user's personal information with trusted third parties to assist in operating this web site, process purchases of vouchers by exam takers, or otherwise service users or conduct Proxor's business. Proxor will only share personal information with these third parties to the extent necessary to accomplish the purposes for which it is being shared. For example, when an exam taker purchases a voucher through this web site, Proxor will share financial and other transaction information with only those third parties necessary to complete the transaction. Proxor requires all such third parties to agree to respect the privacy of user personal information.

Matching exam takers with potential employers. If an exam taker agrees, Proxor will contact the exam taker at the email address provided when a request from a potential employer matches the exam taker's profile. With the exam taker's permission, Proxor will then send the potential employer the exam taker's exam scores and linked personal information and put the potential employer in contact with the exam taker.

Responding to legal requests and preventing harm. Proxor may disclose personal information pursuant to subpoenas, court orders, or other requests (including criminal and civil matters) if it has a good faith belief that the response is required by applicable law. Proxor may also share personal information when it has a good faith belief that sharing it is necessary to prevent fraud or other illegal activity, imminent bodily harm, or cheating. This may include sharing personal information with other companies, lawyers, courts or government entities.

Transfer in the event of sale or change of control. If the ownership of all or substantially all of Proxor's business changes, or in the case of liquidation, examinership or similar proceedings, Proxor may transfer a user's personal information and exam scores to the new owner, liquidator or examiner, as applicable. Such information would remain subject to the protections described in this Privacy Statement.

No other sharing. Other than the circumstances described above, Proxor will not sell, trade, or otherwise transfer to outside parties a user's personal information or any exam scores that are linked to any personal information without the consent of such user.

How Proxor stores and protects personal information

Storage and disposal. Proxor will keep a user's personal information to the extent and only for so long as is necessary to be used for the purposes described in this Privacy Statement and, in the case of an exam taker, also only for so long as the account has not been deleted at the request of the exam taker. Proxor will destroy or otherwise dispose of the personal information in a manner that preserves the user's privacy and security.

Security measures. Proxor implements a variety of security measures to maintain the safety of user personal information. Proxor keeps user personal information on a secured server with a hot standby to ensure such information has the highest availability. The servers are behind a firewall. All information transmitted from this web site is encrypted via secure socket layer (SSL) technology.

Risks of circumvention of Proxor security measures. Proxor is not responsible for third party circumvention of any of its security measures. Users can reduce the risk of such circumvention by using common sense security practices such as choosing a strong password, using a different password for other web sites, and using up to date antivirus software.

Handling security incidents. If Proxor discovers that the security or integrity of user personal information has been compromised, then Proxor will take appropriate steps to respond to the incident including notifying affected users of the incident so they can in turn take whatever steps may be appropriate to protect themselves.

Reporting violations. Users should report any security violations to Proxor by contacting customerservice@proxor.com.

How users can access, change or remove personal information

Access to personal information. Users have a right to access their personal information held by Proxor. Users may review their personal information by logging in to their account and accessing their profile. Users who are unable to log in to an account may contact Proxor at customerservice@proxor.com and upon appropriate verification of identity will be granted access.

Rectification of personal information. Users may correct or update their personal information in their profile at any time by logging in to their account. Such corrections or updates take effect immediately. If an exam taker believes that his or her personal information has been linked to an exam score that is not his or her own, the exam taker may contact Proxor at customerservice@proxor.com and Proxor will investigate and rectify the matter as necessary.

Deactivating an exam taker's account. Exam takers may deactivate an account by contacting Proxor at customerservice@proxor.com. When an exam taker's account is deactivated, Proxor retains the exam taker's personal information and profile on its server. However, the exam taker and any Proxor Exam Partner who would otherwise have access to the exam taker's scores will not be able to access those scores. Exam takers may reactivate an account by contacting Proxor at customerservice@proxor.com.

Deleting an exam taker's account. Exam takers may delete their account by contacting Proxor at customerservice@proxor.com. When an exam taker account is deleted, Proxor will delete all personal information of the exam taker from its servers. Proxor may retain de-identified exam scores for analytical purposes which may be linked to general demographic information in the exam taker's profile that is not personally identifiable. The exam taker and any Proxor Exam Partner who would otherwise have access to the exam takers scores will not be able to access those scores. Proxor Exam Partners and their personnel are not able to delete their accounts.

Third party privacy policies and links

Exam takers who purchase vouchers from Proxor through this web site may, by doing so, involve their own financial institutions, Proxor's financial institutions and one or more other intermediaries, each of which may have its own distinct privacy policies. Exam takers assume responsibility for informing themselves of the privacy policies of their financial institutions and any intermediaries and making appropriate choices, including refraining from using payment methods that involve any financial institution or intermediary whose privacy policies they do not accept.

This web site may have links to third party web sites. These third party web sites have separate and independent privacy policies. Proxor is not responsible or liable for the content and activities of these linked sites. Nonetheless, Proxor welcomes any feedback about these third party web sites.

Location of servers

This web site is hosted on servers located in the Republic of Ireland. Personal information may therefore be transferred between the Republic of Ireland and any location from which a user accesses this web site.

Web site Privacy Statement only

This Privacy Statement applies only to information collected by Proxor through this web site and not to information collected by any other person or through any other means.

Changes to this Privacy Statement

Proxor reserves the right to update this Privacy Statement from time to time. Any changes will only be effective prospectively, and, with respect to any particular information of or relating to any user, Proxor will comply with this Privacy Statement as in effect at the time such information was supplied or obtained unless Proxor obtains such user's consent for any other or different terms.

Access to this Privacy Statement

The most recent version of this Privacy Statement can be found at www.proxor.com/datapolicy.

Contacting Proxor

Users may contact Proxor at the following address with any questions, comments or concerns relating to this Privacy Statement, this web site or any other aspect of its business.

Proxcer Limited
40 Upper Mount Street
Dublin 2, Ireland
Email: customerservice@proxor.com

Consent

Use of this web site constitutes consent to the terms and conditions of this Privacy Statement.