



## **PRIVACY POLICY**

WERCS PROFESSIONAL SERVICES, LLC  
(Updated April 17, 2006)

WERCS Professional Services, LLC (for convenience referred to herein as "WPS"), provide products and services that assist companies in communications and complying with governmental regulations regarding potentially hazardous materials.

### **Data Collection**

The only data we collect is data which you provide. In all cases where you are requested for data, we will indicate why such data is being requested and the use for the same.

In order to use our Web site, you must first complete the registration form. During registration you are required to provide contact information (such as name and email address). We use this information to contact you about the services on our site in which you have expressed interest.

In addition, if you purchase a product or service from us, we request certain personally identifiable information from you on our order form. You must provide contact information (such as name, email, and shipping address). Payments are processed through Pay-Pal.com. We use this information to fill your orders. If we have trouble processing an order, we will use this information to contact you.

As is true of most Web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

We do not link this automatically-collected data to personally identifiable information.

### **Product Data**

To provide our services, we require detailed information about the product. For example, to write a Material Safety Data Sheet ("MSDS") with respect to a product, or to provide the retailer sufficient information regarding the product's potential hazards, we require a complete listing with percentages of all the ingredients of that product. Such data is referred to herein as the "Raw Data."

We recognize and respect the confidentiality of the Raw Data you provide. We are committed to protect such data in a responsible and professional manner. We use such data and information only for the purposes for which it is entrusted to us, and which we disclose to you. That is, generally, to produce the Hazard Communication Documents and Regulatory Data (both are described below).

## **Use of Product Data**

We have automated systems that utilize the Raw Data to produce documents used for hazardous communications. These documents include MSDS and documents mandated by the retailer for their internal hazard communication purposes ("Hazard Communication Documents"). Our systems also call specific data out of the Raw Data and produce certain information that the retailer requires to comply with government regulations (the "Regulatory Data"). Our web site specifically describes the Hazard Communication Documents produced and the Regulatory Data, and requires your authorization before the same is transmitted to recipients of your product.

In order to produce such documents, our regulatory specialists review the data and the resulting documents. Generally, the regulatory specialists are our employees, each of whom is contractually obligated to maintain the confidentiality of your data. In certain limited instances, to serve you, third parties may assist us. These service providers will only be given limited access to the data, and will be contractually obligated to maintain the confidentiality thereof.

In addition, we may disclose data received from you if required to by a law enforcement action such as a court order, subpoena or search warrant.

## **Data Retention**

We note that to serve our customers better and more efficiently (for example to avoid having to enter data numerous times) and for quality control purposes, we retain the Raw Data you provide. We use such data only for the purposes disclosed to you.

We also retain the Hazardous Communication Documents and the Regulatory Data after they are transmitted to the entity receiving the product. Once transmitted, Hazardous Communication Documents and the Regulatory Data are public. Among other things, they may be accessed and used by employees of the retailer. The Regulatory Data may be accessed by the retailer to enable it to comply with governmental regulations.

## **Changes in this Privacy Statement**

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.