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## Online Privacy Policy

We respect the privacy and security of your personally identifiable information that we collect about you online. The following describes our privacy policy and practices with respect to that information. By your registration to use, or use of the services, you consent to our collection and use of your personally identifiable information and other information online by us in the manner set forth in this Online Privacy Policy. Please read this policy carefully. We may change this policy from time to time, and we will post those changes on this page. Please check back periodically.

If you have any questions concerning our Online Privacy Policy, please contact us via email at [TechSupport@CiraMail.com](mailto:TechSupport@CiraMail.com).

Your community association or its management company may give us personally identifiable information about you to permit us to verify your identity as a person who is entitled to register to use and to continue to use the services we provide to you and your community association through your community association's management company. When you register to use services, we will ask for certain personally identifiable information to confirm your identity as a person authorized to use the services. This information is required to be complete and accurate at the time it is given, and to be updated so that it is at all times accurate and complete, as a condition of your continued ability to use the services.

Once you have registered to use the services, whenever you sign in to use the services your personal identity is known to us.

Other personally identifiable information about you may be given to us by the community association, its management company, or you in order to render the services. For example, we may assist the community association's management company in compiling an electronic database of members of the community association, or posting an online directory of members.

You may give your credit card number to the community association or its management company or us through the services in order to pay your community association's dues or assessments or to pay for other items. However, prior to its transmission to your community association's (or its management company's) bank, your credit card information is encrypted through the use of secure server software and is then transmitted in this secure and encrypted fashion. Your credit card information is not retained by us.

If you send an email message, we will receive your email address and any other personally identifiable information you may include in that message.

When users or other visitors visit a web site that we manage or when they access or utilize one of our mobile applications, our servers automatically record certain information and retain it in the servers' logs. This information may include your type of device, operating system, IP address, domain name, browser type, GPS location, date and time of the visit, pages or modules visited and the duration spent on each page, and similar information that is not normally considered "personally identifiable information". The information may also include logging any actions taken by you on those web sites or via our mobile applications; including the date and time such action was taken. These actions may include, for example, entering data into an online form or submitting your approval or denial to an item or question.

In the course of using the services, you may provide personally identifiable information to others. For example, you might post a message to a message board, submit an online form, or send an email to another member, your community association, or the community association's management company, that may contain personally identifiable information. We do not control the privacy practices or policies of any such person or entity, and they are not covered by this Online Privacy Policy.

We do not sell or rent your personally identifiable information in the normal course of our business; however, if all or substantially all of our assets are sold to a third party, your personally identifiable information will be included in the assets transferred. We share your personally identifiable information with your community association and the community association's management company, on whose behalf we are providing the services. We also share the information with third parties that may provide a portion of the services. We do not allow such third parties to use that information other than in connection with the provisions of the services. We may disclose personally identifiable information to any third party if required to do so by law or regulation, or if we believe in good faith that such disclosure is necessary to:

- (a) comply with legal process;
- (b) enforce the Terms of Service;
- (c) respond to claims that any content of any portion of the services violated the rights of third parties; or
- (d) protect the rights, property, or personal safety of us, other Users or the public.

We may maintain our own separate databases in order to provide the services, to which you will not have online access. For example, we may maintain one or more databases of members of a community association who are entitled to become and remain users of the services. Such databases may contain information furnished by the community association, its management company, and/or members, or otherwise collected as set forth in this Online Privacy Policy. If you wish to ask us about the personally identifiable information that we may have collected about you and that is not available to you online, you should email us at [TechSupport@CiraMail.com](mailto:TechSupport@CiraMail.com). We will use commercially reasonable efforts to comply with your request, and to update and/or correct any personally identifiable information that is contained within such databases.

Access to the services, including to databases containing personally identifiable information, is password protected. Any personal information that you have posted in any portion of the services (e.g. a message board or an online form) should be accessible only by the community association, the community association's management company, other members and other authorized users of the services. It is the responsibility of each user to protect the user's password. Do not divulge it to anyone. Log off your computer or close your browser window to ensure that others cannot access your password.

We use industry-standard software, hardware and other measures, to protect the confidentiality, security and quality of information we collect, and to protect it from unauthorized access or disclosure or accidental loss, alteration or destruction. Due to the nature of the Internet and computer security, we cannot warrant or guarantee that security will never be breached. If any personally identifiable information is breached you agree to hold us harmless for any damages or agree that we will have no obligation to monitor your information in the future for use by unauthorized parties.

You must be 18 years of age or older to register to use the services. We do not knowingly collect personally identifiable information from children under the age of 13. If such information is inadvertently or unknowingly collected, it is our policy to destroy or delete it upon discovery.