

Privacy Policy

Zenith Infotech respects your privacy. This Privacy Policy informs you of our privacy practices, and of the options you have with regard to how your personal information is collected and used.

Zenith Infotech (“Zenith” or “We”) self-certifies the privacy policies described below in accordance with the U.S.-E.U. Safe Harbor principles, specifically, Notice, Choice, Onward Transfer, Access and Accuracy, Security, and Oversight/Enforcement.

More information about the U.S. Department of Commerce’s Safe Harbor Program can be found at <http://www.export.gov/safeharbor> .

I. Application.

This Privacy Policy applies to all websites owned or used by Zenith (“Zenith’s Websites”), as well as all Web-based transactions in which Zenith collects Personal Information (as defined below) from its customers.

This Policy applies to all Personal Information received by Zenith in any format including electronic, paper or verbal formats. Zenith will not sell or share this information with third parties in ways different than what is disclosed in this Privacy Policy. On a global basis, Zenith will, and will cause its affiliates to, establish and maintain business procedures that are consistent with this Policy.

II. Scope; Usage.

Collection of Personal Information

For the purposes of this Policy, “Personal Information” means any information that identifies, or could be used by or on behalf of Zenith to identify, an individual. Personal Information does not include information that is encoded, nor does it include publicly available information that has not been combined with non-public Personal Information.

In order to provide you with the highest level of service, we ask that you voluntarily provide us with certain Personal Information about yourself. Your Personal Information includes your first and last name, your company name (if applicable), your physical address, and your email address. From time to time, we may also ask you to voluntarily provide us with the email addresses of your friends or colleagues, so they too can benefit from the various products and services offered by Zenith and Zenith’s trusted affiliates.

Zenith also collects information from commercially available sources that it deems credible. Such information may include your name, address, email address and demographic data. The information Zenith collects from these commercial sources may be combined and cross-referenced with the information you provide to Zenith.

Use of Your Personal Information

We use your Personal Information to provide you with the services which Zenith is contractually obligated to provide to you. We also may use your Personal Information to assist you in completing a transaction, or to communicate with you about our products or services.

We may disclose your Personal Information if we are required to do so by law or we in good faith believe that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property; (3) protect against misuse or unauthorized use of our website; or (4) protect the personal safety or property of our users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

In addition, we may use your Personal Information in the aggregate to determine our customers' demographics and preferences. By doing so, we are able to provide you with targeted services that you may find to be helpful and informative.

Other than as stated in this Privacy Policy, we will not release your Personal Information to unknown or unaffiliated third parties, and we will not cross-reference your Personal Information with that of any other customer or entity.

Sharing of Your Personal Information

On occasion, we may hire third parties to perform certain functions on our behalf. Examples include fulfilling orders, delivering packages, removing repetitive information from our customer lists, analyzing data, providing marketing assistance, and providing customer service. These third parties have access to your Personal Information to the extent necessary to permit them to do their jobs, however, they are bound by confidentiality agreements before any information is provided to them, and they are restricted from using the information for other purposes.

Where Zenith has knowledge that one of Zenith's employees or agents is using or disclosing Personal Information in a manner contrary to this Policy, Zenith will take reasonable steps to prevent or stop the use or disclosure. Zenith holds its employees and agents accountable for maintaining the trust that our customers place in the company.

Also, in the unlikely event that Zenith, or substantially all of Zenith's assets are acquired, your Personal Information may be one of the transferred assets. It is Zenith's practice to seek appropriate protection for information in these types of transactions.

Your Choices

You will have the option to opt-out of any uses of Your Personal Information in which your Personal Information would be disclosed to a non-agent third party, or where such

information would be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by you. Zenith will provide you with reasonable “opt out” mechanisms to exercise your choice before Zenith discloses any information as described in the paragraph.

Accuracy & Access

Zenith will take reasonable steps to ensure that your Personal Information is relevant, accurate, complete and current, to its intended use. We provide individuals with reasonable access to personal information that they provided to us, as well as the ability to review and correct such information, as applicable.

To protect your privacy and security, we also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your Personal Information. To view and change the Personal Information that you directly provided to us, you can return to the Web page where you originally submitted your data and follow the instructions on that Web page, or contact Zenith’s Privacy Officer.

In addition, we may limit or deny access to Personal Information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement. In some circumstances, we may charge a reasonable fee, where warranted, for access to Personal Information.

Security

To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of your Personal Information, we utilize physical, technical and administrative procedures to safeguard the information we collect.

Among other things, we use Secure Sockets Layer (SSL) encryption when collecting or transferring sensitive data, such as credit card information. SSL encryption is designed to make the information unreadable by anyone but us. This security measure is working when you see the symbol of either an unbroken key or a closed lock (depending on your browser) at the bottom of your browser window.

We also use firewalls and restricted access methods to ensure the security of the information we collect. We limit access to your Personal Information and data to those persons in Zenith, or as agents of Zenith, that have a specific business purpose for maintaining and processing such information. Zenith’s employees who have been granted physical access to your Personal Information will be made aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

In addition, Zenith's Websites use cookies. A "cookie" is a small text file that contains a string of alphanumeric characters. There are two types of cookies that may be used at Zenith's Websites: persistent cookies or session cookies. A persistent cookie gets entered by your Web browser into the "Cookies" folder on your computer and remains there after you close your Web browser. Persistent cookies may be used by your browser on subsequent visits to the site; however, session cookies are held temporarily in your computer's memory and disappear after you close your browser or shut off your computer.

If you have arrived at any of Zenith's Websites by clicking on a banner ad for one of Zenith's products or services, a session cookie may be used. This cookie contains an identification number for the advertisement that you clicked on, and it helps Zenith determine which of its ads attracts the most visitors. If you choose to request further information from us about Zenith's products and services, the personal information that you provide in that request will be linked to the information in the session cookie.

In order to better understand how our sites are used, Zenith's Websites may also use persistent cookies along with other information collected in our servers' files (e.g., IP Address, referring URLs, etc.). Such information is not combined with information from any other cookie.

Contact for Privacy Issues

Zenith Corporation has designated its legal counsel, Bradley J. Gross, Esq., as the contact person for all questions and issues related to this Policy. His email address is bgross@becker-poliakoff.com, and his postal address is Bradley J. Gross, Esq., c/o Becker & Poliakoff, P.A., 3111 Stirling Road, Fort Lauderdale, FL 33312.

If you have any questions or comments about this Policy, please direct them to Mr. Gross.

III. Dispute Resolution

Zenith will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Zenith and the complainant, we have agreed to participate in the dispute resolution procedures of the panel established by the EU data protection authorities to resolve disputes pursuant to the Safe Harbor Principles. In the event that we or such authorities determine that we did not comply with this policy, we will take appropriate steps to address any adverse effects and to promote future compliance.

Any person who we determine is in violation of our privacy policies will be subject to disciplinary process.

IV. Changes to This Privacy Policy

The practices described in this Policy are the current Personal Information protection policies as of April 15, 2009. Zenith reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Appropriate notice will be given concerning such amendments.