



July 1, 2013

## PRIVACY STATEMENT

SAGE Dining Services, Inc. has created this security and privacy statement in order to document and communicate our commitment to doing business with the highest ethical standards and appropriate internal controls.

We respect your privacy. Information you entrust to SAGE will be handled with the greatest care, and we will not use the information in ways to which you have not consented or which is not required by law.

### POLICY SCOPE

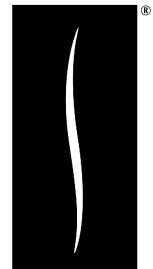
**Sites Covered by This Policy** - This Privacy Policy applies to all SAGE-owned websites and domains

**Links to Other Sites** - This site contains a number of links to other sites. SAGE is not responsible for the security or privacy practices of these sites, the products or services offered by these sites, or the content appearing at these sites. SAGE does not endorse any of the products or services marketed at these other sites.

### WEB SITE INFORMATION GATHERING

SAGE recognizes the importance of keeping the information we collect about you confidential. We always take great care to protect what you entrust to us. SAGE is committed to protecting the privacy of visitors to our website.

**Personal Information Gathering** - We do not automatically collect personally identifiable information (PII) about our web site visitors. We may record the Internet protocol (IP) address of the computer you are using, the browser software used, the operating systems used, and the websites from which our visitors link directly to our site. We aggregate and use this information to determine how many visitors we have to different pages on our website, to detect and correct systems problems, and to improve the usability of our web site. This information is not connected to individual names or personal identities.



**Explicit Information Gathering** - You can examine our entire web site without providing any information whatsoever. Our web site's request-for-more-information form requires users to give us contact information. This information is used to provide information to those who inquire about our services or to handle related business matters. This information is also used to get in touch with customers when a SAGE manager needs to contact a previous website user.

**Covert Information Gathering** - Our site does not covertly capture information regarding the specific activities of any particular user. We do not have any arrangements with any other sites to track or monitor user activities on the Web. Our site does, however, produce reports that permit us to view your activity on our site in anonymous or aggregated form. We do not use web bugs, web beacons, or any other active content mechanism to capture or maintain information about users without their prior consent. The only personal information that we capture has been specifically submitted to us through the request-for-more-information form.

**Personal Information Usage** - When you disclose personal information to us that is where it stays. The only exception involves disclosure to the government according to normal business practice, for instance for the collection of taxes, and according to the orders of a court, for example responding to a subpoena or search warrant. We do not sell, rent, trade, lend, or otherwise transfer such personal information to any other organization.

## **CHILDREN**

**Precautions For Children** - SAGE provides on-line menus which are intended to be viewed by children as well as by their parents. SAGE does customer satisfaction surveys in which answers are collected from those we serve, including children. These surveys seek information about the quality of our food and of the service we provide as viewed by each group of our clientele, including schoolchildren.

SAGE does not attempt to collect personal information from children, and we do not provide on line services to children other than these two items. The SAGE website is not otherwise directed to children under age 18, and we do not knowingly collect personal information from children under age 18. If a child sends personal information to us, and this information can be identified as originating from a child, the information will be deleted. We cannot always determine which information originates with a user that is a child. We do not maintain databases about children.

## **EMAIL LIST PRIVACY**

**Opt-in Email Lists** - We use email lists that we have assembled from our client contacts and any website visitors who have indicated that they would like SAGE to contact them for various reasons (i.e. dining account status alerts, customer satisfaction surveys, etc.)

**Email List Privacy** - SAGE does not sell, rent or share our email lists with any other third parties. We do not link our email lists to any other databases. We do not store emails or individual information on our web server. All personally identifiable information is stored on servers behind our network firewall.

### **Third Party Access to Your Personal Information**

SAGE may use third-parties to process your personal information. In these cases, the information is only used for SAGE's business purposes. SAGE contractually prohibits these vendors from using your personal data for any other activities, and from disclosing, selling or leasing them to any other parties.

**Compelled Disclosure** - There may be times when we are required by law to disclose the information that you have submitted. Unless we are legally prohibited to do so, we will do our best to provide you with notice that a request for your information has been made to give you an opportunity to object to the disclosure. If you do not challenge the disclosure request, we may be legally required to turn over your information.

### **WEB SITE SECURITY**

**Security Measures** - Our site is protected with a variety of security measures such as change control procedures, passwords, and physical access controls. We also employ a variety of other mechanisms to ensure that data you provide is not lost, misused, or altered inappropriately. These controls include data confidentiality policies and regular database backups.

**Encryption Policy** - We use SSL encryption to protect the information you submit to us.

**Storage of Personally Identifiable Information (PII)** - We do not store any personally identifiable information on our web server.

**Accountability** - Information security personnel ensure the security of the information we process and store.

**Policies and Procedures** - SAGE has internal policies and procedures to limit access to your information to only those who have a business need to view it.

**Collecting Confidential Information** – SAGE will always use encryption when collecting personal information via web forms. Web site users can identify these forms by looking in the address bar of the browser, where the “https” in the URL indicates a secure connection. Site users can also view the “padlock” icon within the browser window. A closed padlock indicates an encrypted connection.

### **YOUR PERSONAL INFORMATION**

**Your Opt-In and Opt-Out Decisions** - SAGE will maintain mailing lists of our web site visitors who supply contact information and have chosen not to Opt Out. All email announcements from SAGE will include a link to allow recipients to Opt Out of any future communications.

**Product Information** - If you would like to receive information regarding our services, please fill out our information request form.

**Privacy Policies** - If you have a question about our privacy practices, please fill out our privacy information request form on the SAGE Dining Services web site: [www.sagedining.com/contact/html](http://www.sagedining.com/contact/html).

**Email Lists** - If you are currently on our email list and wish to be removed, please send an email with the subject "UNSUBSCRIBE" to: [opt-out@sagedining.com](mailto:opt-out@sagedining.com).

### **Privacy Policy Changes**

**Policy Change Notice** - We may occasionally make changes to our privacy policy to reflect changes in legal and regulatory requirements, or as necessary as we upgrade or modify our technology, applications and service offerings. We recommend you visit our site to review our privacy policies occasionally.