**Periscope Holdings, Inc. policies**

**Because COMMBUYS is hosted by Periscope Holdings, Inc., their Standard Data Management and Security Policy, Privacy Policy and Acceptable Use Policy will apply to the use of COMMBUYS. Any questions related to these policies must be directed to the COMMBUYS Help Desk at** [**COMMBUYS@state.ma.us**](mailto:COMMBUYS@state.ma.us)**.**

**Acceptable Use Policy**

Changes to the Site and services provided:

* The content of the pages of this site is for your general information and use only. It is subject to change without notice;
* Periscope Holdings, Inc. will make every effort to ensure that the site and services are constantly operational;
* Periscope Holdings, Inc. reserves the right to modify, discontinue or suspend all or part of the site or its services at any time without notice.

**User Conduct**

* You must not knowingly use the website in any way that causes, or is likely to cause, the site or access to it to be interrupted, damaged or impaired in any way;
* You must ensure that any content you upload onto the site (including photographs) is not obscene, offensive, defamatory or racist and does not breach any law or regulation or any intellectual property rights of a third party or any right or duty owed to a third party. This means that if any of the content you upload is copyright protected, you must obtain the copyright owner’s written permission in order to use it;
* In the event that you become aware of any content which breaches any of the above rules, please notify us immediately by emailing info@periscopeholdings.com;
* You must not use the site to misrepresent your identity or affiliation with any person or organization;
* You must not use the site to send junk or spam email;
* You must not use the site to conduct, display or forward details of any survey, unless conducted for business data gathering purposes, contest, pyramid scheme or chain letter;
* Periscope Holdings, Inc. reserves the right to remove any inappropriate or unauthorized content from any page with reasonable notification to OSD and agreed-upon changes or deletion.
* You must not attempt to modify, adapt, translate, sell, reverse engineer, decompile or disassemble any portion of this web site or any other web site;
* You must not attempt to bypass the network firewall;
* You must not use any part of this website which you are not authorized to use or devise ways to circumvent security in order to access part of this web site which you are not authorized to access. This includes but is not limited to scanning networks with the intent to breach and/or evaluate security, whether or not the intrusion results in access;
* You must not use or attempt to use this website for any unlawful, criminal or negligent purpose. This includes but is not limited to password cracking, social engineering (defrauding others into releasing their passwords), denial-of-service attacks, harmful and malicious destruction of data, and introduction of computer viruses and intentional invasion of privacy.

**Data and Security**

Periscope’s data facility features the highest levels of security, redundancy, reliability, and technical expertise necessary to build, deploy and manage Internet operations for Managed Hosting customers.

**Physical Security**

• Data center access limited to data center technicians

• Biometric scanning for controlled data center access

• Security camera monitoring at all data center locations

• 24x7x365 onsite staff provides additional protection against unauthorized entry

• Unmarked facilities to help maintain low profile

• Physical security audited by an independent firm

**System Security**

• System installation using hardened, patched OS

• System patching configured to provide ongoing protection from exploits

• Dedicated firewall and VPN services to help block unauthorized system access

• Data protection with managed backup solutions

• Optional, dedicated intrusion detection devices to provide an additional layer of protection against unauthorized system access

• Distributed Denial of Service (DDoS) mitigation services based on our proprietary system

• Risk assessment and security consultation by professional services teams

**Operational Security** *– the Infrastructure*

• ISO17799-based policies and procedures, regularly reviewed as part of our SAS70 Type II audit process

• All employees trained on documented information security and privacy procedures

• Access to confidential information restricted to authorized personnel only, according to documented processes

• Systems access logged and tracked for auditing purposes

• Secure document-destruction policies for all sensitive information

• Fully documented change-management procedures

• Independently audited disaster recovery and business continuity plans

**Operational Security** *– Customer's Application Environment*

• Best practices used in the random generation of initial passwords

• All passwords encrypted during transmission and while in storage

• Secure media handling and destruction procedures for all customer data

• Support-ticket history available for review via the customer portal

• Help is available in configuring system logging to create a system audit trail

• Security Services can provide guidance in developing security processes for compliance Building access is via building issued access card and security guard review after hours

**Privacy Policy**

Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We respect your right to keep your personal information confidential and understand your desire to avoid unwanted solicitations. We hope that by taking a few minutes to read this Privacy Policy, you will have a better understanding of what we do with the information you provide to us and how we keep it private and secure.

**Privacy Policy Updates**

Due to the Internet’s rapidly evolving nature, Periscope may need to update this Privacy Policy from time to time. Periscope will post its current Privacy Policy on our company website. This will enable you to always be aware of what personal information we may collect and how we may use this information. Periscope encourages you to review this Privacy Policy regularly for any changes. Your continued use of this Site or continued provision of personal information to us will be subject to the terms of the then-current Privacy Policy.

**Information Collection and Use**

You can generally visit our Site without revealing any personal information about yourself. However, if you register for any purpose, we will collect certain personal information such as name, email, phone number, and address. Any information we collect from you may be used in one of the following ways:

To personalize your experience

Your information helps us to better respond to your individual needs.

To improve customer service

Your information helps us to more effectively respond to your customer service requests and support needs.

To process transactions

Your information, whether public or private will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the service requested.

**Disclosure**

We reserve the right to provide your personal information to the vendors and service agencies that we may engage to assist us in providing our services to you. We will disclose your personal information if we reasonably believe we are required to do so by law, regulation, or other government authority.

**Cookies**

We may use small text files called cookies to improve overall website experience. A cookie is a piece of data stored on the user’s hard drive containing information about the user. Cookies, which are non-persistent, generally do not permit us to personally identify you.

**Security**

We employ procedural and technological measures, consistent with industry practice. Such measures are reasonably designed to help protect your personal information from loss, unauthorized access, disclosure, alteration or destruction. Periscope uses firewalls, password protection, secure socket layer (SSL) and other security measures to help prevent unauthorized access to your personal information.

**Children**

We do not knowingly request or collect personal information from users under 13 years old. If we find out that we have collected any personal information from such a user, we will immediately delete that information.

**Links to Other Websites**

Our Site may contain links to other websites. We do not control these websites and are not responsible for their uses of personal information or for any harm or loss suffered by you in relation to the use of such websites. You should familiarize yourself with the privacy policies of any linked websites when you visit them.

**Sale of Assets**

If another company acquires all or substantially all of the assets related to our business, we reserve the right to include any or all stored personal information among the assets transferred to the acquiring company. In such event, users who have provided their email addresses will be notified when their personal information is transferred and becomes subject to a new privacy policy.

**Your Consent**

By using our Site, you consent to our website privacy policy.

**Contacting Us**

If there are any questions regarding our privacy policy you may contact us at [info@periscopeholdings.com](mailto:info@periscopeholdings.com).

**Effective Date**

This privacy policy had an original effective date of January 1, 2013.