

IMAGINE TILE, INC. PRIVACY POLICY

Your privacy is very important to us. This Privacy Policy discloses how Imagine Tile, Inc. ("IT") collects, protects, uses and shares personal information gathered about you ("Personal Information"), in conformance with applicable law. All Personal Information is collected in a fair and non-intrusive manner, with your voluntary consent. Personal Information is not accessible to anyone outside the specific function for which it is collected. IT respects the privacy of employees and job applicants, customers and other visitors to our websites who may choose to provide Personal Information. We recognize the need for appropriate protection and management of Personal Information that you provide to us. This Privacy Policy will assist you to understand what types of information we may collect, how that information may be used, and with whom the information may be shared.

In an effort to comply with the law, and our commitment to protect your Personal Information, we provide the following information about our policies.

What type of information do we collect?

Personal Information is any information concerning the personal or material circumstances of an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Personal Information shall include but is not limited to: identifying information such as name, home address, home telephone number, e-mail address, Social Security Number, financial information and employment-related information such as may be found on resumes, applications, background verification information, or in employment references.

IT takes measures to maintain the confidentiality of your Social Security Number, to protect your Social Security Number from unlawful disclosure, and to limit access to your Social Security Number. IT will not make your Social Security Number available to the general public, print your Social Security Number on any card, require you to provide your Social Security Number to access any products or services, transmit your Social Security Number over the Internet unless the connection is secure or your Social Security Number has been encrypted, or require the transmittal of your Social Security Number to access our Website without requiring additional authentication.

We will not collect sensitive Personal Information, except to comply with affirmative action data requirements. Sensitive Personal Information can include, but is not limited to, information pertaining to gender, disabilities and veteran status.

Cookies – Internet Users

In addition to Personal Information, we use data collection devices such as "cookies" on certain web pages to help analyze our web page flow and measure promotional effectiveness. Cookies are pieces of information a website sends to an individual's hard drive while they are viewing the website. Cookies allow the website to remember important information that will make your visit

to the site more useful. We use cookies to help improve your future visits. If you do not wish to receive a cookie or if you wish to set your browser to warn you each time a cookie is being sent, or if you wish to turn off all cookies, use the options on your browser to assist you. The “Help” option on your browser may assist you in changing your cookie preferences. Please note that by turning cookies off, you will not have access to many features available on our website.

Children and Data Collection

IT adheres to the federal privacy protection standards as stated in the Children's Online Privacy Protection Act (“COPPA”). We care about the safety of children. We will not knowingly allow anyone under 13 to provide us any personally identifying information. Children under 13 years of age are required to obtain the express permission of a parent or guardian before submitting any Personal Information about themselves (such as their names, e-mail address, and phone number) over the Internet. If a child has provided us with personally-identifiable information without the consent of a parent or guardian, the parent or guardian of that child should immediately contact IT's Privacy Officer using any of the means set out below under “Contact Information”.

Our Use of Your Information

We use your Personal Information to facilitate the services you request. We have tailored our Privacy Policy to adequately inform you of the use of your Personal Information.

Collection and Use of Employee Personal Information

IT also collects Personal Information from its employees and applicants in connection with administration of its Human Resources programs and functions. These programs and functions include, but are not limited to: job applications and hiring programs, compensation and benefit programs, performance appraisals, training, access to IT facilities and computer networks, employee profiles, internal intranet employee directories, Human Resource recordkeeping, affirmative action data, and other employment related purposes.

It is the policy of IT to keep all past and present employee information private from disclosure to third parties. There are certain business related exceptions and they are:

1. To comply with county, state or federal agency requests;
2. Inquiries from third parties with a signed authorization from the employee to release the information, except in situations where limited verbal verifications are acceptable (see below); and
3. Third parties with which IT has contractual agreements to assist in administration of company sponsored benefits.

Verifications of Employment

Prospective employers, state agencies, financial institutions, and residential property managers may routinely contact IT requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed on a confidential basis by IT's Human Resources Department and Payroll Department.

For written verification of employment requests, information will be provided on the form only when it is accompanied by an employee's signed authorization to release information. The form

will be returned directly to the requesting party and filed as part of the Human Resources or Payroll Department's confidential records.

Medical Information

IT is compliant with federal HIPAA regulations and only utilizes information related to the company sponsored healthcare plan on a "need to know" basis for administration of the healthcare plan.

Sharing of Personal Information

We may share Personal Information with our service providers, consultants and affiliates for our internal business purposes. Except as described in this Privacy Policy, IT will not share Personal Information with a third party, unless a customer requests, consents to such disclosure, or disclosure is required or authorized by law. IT reserves the right to disclose Personal Information to a third party if a law, regulation, search warrant, subpoena, or court order legally requires or authorizes us to do so.

Security

Any Personal Information you provide to us is securely stored on a database held by IT to which only authorized IT employees and agents have access.

We have put in place administrative measures to ensure that the access that IT employees and agents have to Personal Information on our server is limited to the extent necessary in order to perform their functions.

All our employees are required to treat Personal Information as strictly confidential.

The server holding your Personal Information is protected against both unauthorized physical and electronic access. These measures include an electronic firewall and various other protection measures that involve virus scanning, installation of security patches, vulnerability testing, backup and recovery planning, and other steps designed to improve the data protection posture.

Personal Information stored on the server is available only to authorized computers and is password protected.

While we strive to provide security that is above and beyond industry standards, because of the Internet's inherent vulnerabilities, we cannot ensure or warrant complete security of any Personal Information transmitted to us.

Storage, Retention and Accuracy of Personal Information

IT is committed to safeguarding Personal Information against loss, access, use, modification, disclosure or other misuse. All reasonable steps are taken to prevent unauthorized use or disclosure of your Personal Information.

IT will retain your Personal Information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purpose(s) remains valid after termination of our relationship with you.

We take all reasonable steps to ensure that your Personal Information is accurate, up-to-date, complete, relevant and not misleading.

Contact Information

If you have any questions or concerns about this Privacy Policy or its implementation, you may contact us by email at privacy@imaginetile.com, by mail to Imagine Tile, Privacy Officer, 150 West 25th Street Suite 501, New York, NY 10001 or via phone 800-680-8453 or fax 973-473-0983.

If at any time you decide that we should no longer hold any of your Personal Information, or wish to change the use to which any such data can be put, please contact us using the details above.

Changes to our Privacy Policy

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

REVISED: 03/17/11