

Subject: Security Breach Notification

Effective Date: 30/04/2010

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Purpose

The purpose of this Breach Notification Policy ("Policy") is to provide guidance to management on actions to be taken should a security breach be identified. The aim of the Policy is to minimize the potential exposure to The Active Network, Inc. ("Active") and its customers.

For purposes of the Policy, "Security Breach" is defined as an unauthorized acquisition of computerized data that compromises the security, confidentiality or integrity of personal information maintained by Active or its auxiliary organizations

Scope

This Policy applies to all Active employees, contractors, vendors and agents within Active.

Roles and Responsibilities

Personnel of Active shall disclose any security breach following discovery or notification pursuant to the Action Plan for Notification of a Security Breach.

Managers and Supervisors:

- Ensuring personnel follow the intent of this Policy and are adhering to all related procedures;
- Maintaining procedures and operational manuals that detail specific actions that implement this Policy.

The Director of Compliance:

- Maintaining and enforcing policy.
- Making final decisions regarding external breach notification.
- Providing executive oversight of compliance with all privacy and confidentiality statutory and regulatory requirement.

The Vice President – IT:

- Policy enforcement.
- Assuming the role of Director of Compliance due to absence.

Policy*General*

Though reasonable efforts are made to protect resources and data, there exists the possibility that a security breach may occur. Per this Policy Active shall maintain a reasonable and appropriate breach notification procedure or action plan. These procedures or plans will be updated to comply with existing laws and regulations that address notice requirements for individuals and/or entities that may actually or potentially be affected by unauthorized access or breach.

Notification Timing

Individuals whose information has been compromised shall be notified in the most expedient time possible, and without unreasonable delay, consistent with the legitimate needs of law enforcement or any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

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Content of Notice

The breach notification will provide a brief description of the security breach, a contact for inquiries, and helpful references to individuals regarding identity theft and fraud. The content of the breach notification, and when appropriate, the content of both the web site page and the press release will be reviewed and approved by the Director of Compliance and Director of Corporate Communications.

Communications With Outside Agencies

With the exception or authorization of the Director of Corporate Communications, the CFO, CEO and President, Active personnel are not authorized to speak on behalf of the organization to media personnel or representatives of other outside agencies. All media inquiries or other public affairs inquiries should be directed to the Director of Corporate Communications.

Method of Notification

The method of notification shall be determined by the executive team, that would include but not be limited to the President, CEO, CFO, Director of Corporate Communications, and Director of Compliance. A letter shall be printed with official Active letterhead, addressed to the individual at the last recorded home address, or if only an email address is known, the last recorded email address with the organization. Any notices returned with address forwarding information will be re-sent by the responsible department.

Breach Notification Inquiry Response

Subsequent to a security breach notification, the organization can expect several inquiries from notified users, their parents/spouse, and security vendors. The Director of Corporate Communications will provide a written Inquiry Response Guide to be used by the division executive, or designee(s), to respond to any phone calls/emails/letters/walk in traffic with inquiries regarding the breach.

Enforcement

Any employee found to have violated this Policy is subject to disciplinary action, up to and including termination of employment.

Interpretation of Policy

In the event a need for clarification of this Policy occurs, contact Human Resources, Director of Compliance, or Director of Corporate Communications.