

## **PRIVACY POLICY**

**Accelerate Retention Institute, LLC and its vendors** (referred to herein as “Company,” “our,” “us” or “we”) is committed to respecting the privacy rights of those visiting our Learning Management System (LMS) websites or submitting information to us, including our data collection pages (hereafter collectively referred to as the “Website” or “Websites”) or from whom we collect personal information through any other means (referred to herein also as “you” or “your”). Company created this privacy policy (“Privacy Policy”) to give you confidence as you visit and use the Websites or submit personal information to us and to demonstrate its commitment to fair information practices and to the protection of privacy.

We recognize that the privacy of your personal information is important. The purpose of this policy is to let you know how we handle the information collected through the use of the Websites or through any personal data you submit to us.

### **DATA TRANSFERS**

We reserve the right to store and process your personal information in any country where we have facilities or in which we engage service providers. By accepting the terms of this Privacy Policy, you acknowledge, agree and consent to (1) the transfer to and processing of personal information on servers located outside of the country where you reside and (2) our collection and use of your personal information as described herein and in accordance with the data protection laws of the United States, which may be different and may be less protective than those in your country. At the present time, any information you provide, including any personal information, will be transferred to and processed by a computer server located within the United States.

### **NOT APPLICABLE TO THIRD-PARTY WEBSITES**

This Privacy Policy is applicable to the Websites and to any personal information you submit to us but not to any third-party websites, which may have data collection, storage and use practices and policies that differ materially from this Privacy Policy.

### **YOUR REPRESENTATION AND AGREEMENT**

**BY USING THE WEBSITES OR SUBMITTING PERSONAL INFORMATION TO US, YOU REPRESENT AND WARRANT THAT YOU HAVE READ AND UNDERSTOOD AND AGREE TO ALL OF THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT UNDERSTAND OR DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, YOU MUST IMMEDIATELY LEAVE THE WEBSITE OR NOT SUBMIT PERSONAL INFORMATION TO US.**

### **CURRENT VERSION**

Each time you use the Websites or submit personal information to us, the then-current version of this Privacy Policy will apply. Accordingly, each time you use the Website or submit personal information to us, you should check the date of this Privacy Policy (which appears in the footer of the Websites or is available through links on our data collection forms) and review any changes since the last time you visited the Websites or submitted personal information to us.

### **CHILDREN’S PRIVACY; INFORMATION FOR CHILDREN UNDER THE AGE OF 13.**

Company will not intentionally collect any personal information from children under the age of 13 through this Website or any other means without receiving parental consent. If you think that we have

collected personal information from a child under the age of 13 through this Website or any other means, please contact us. Company has designed this Privacy Policy in order to comply with the Children's Online Privacy Policy Act (COPPA).

Company does not solicit or knowingly collect personally identifiable information from children under the age of 13. If Company obtains actual knowledge that it has collected personally identifiable information from a child under the age of 13, Company will immediately delete such information from its database. Because Company does not knowingly or intentionally collect personally identifiable information from children under the age of 13, Company has no such information to use or disclose to third parties.

### **INFORMATION COLLECTION**

Company collects information from customers and visitors to the Websites or our data collection forms.

### **TRAFFIC DATA**

On its Websites, Company automatically gathers information of the sort that browsers make available, including: (i) IP addresses; (ii) domain servers; (iii) types of devices accessing the Website; and (iv) types of web browsers accessing the Website (collectively "Traffic Data"). Traffic Data is anonymous information that does not personally identify you.

### **COOKIES AND TRAFFIC DATA**

A cookie is a string of information that a website stores on a user's computer, and that the user's browser provides to the Websites each time the user submits a query to the Websites. The purpose of a cookie is to identify the user as a unique user of the Websites. Company uses cookies to customize your experience on the Websites to your interests, to ensure that you do not see the same informational messages repeatedly, and to store your username so you do not have to re-enter it each time you visit the Website. For additional information on Company's uses of cookies, see the sections concerning Information Use and Disclosure Practices/Traffic Data and Information Gathered Using Cookies, below.

The Company uses various technologies, which may include "cookie" technology, to gather information from our visitors such as pages visited and how often they are visited, and to enable certain features on this Website. "Cookies" are small text files that may be placed on your computer when you visit a Website or click on a URL. Cookies may include "single-session cookies" which generally record information during only a single visit to a Website and then are erased, and "persistent" cookies which are generally stored on a computer unless or until they are deleted or are set to expire.

You may disable cookies and similar items by adjusting your browser preferences at any time; however, this may limit your ability to take advantage of all the features on this Website.

We may also allow third party service providers to use cookies and other technologies to collect information and to track browsing activity over time and across third party Websites such as web browsers used to read our Websites, which Websites are referring traffic or linking to our Websites, and to deliver targeted advertisements to you. We do not control these third-party technologies and their use is governed by the privacy policies of third parties using such technologies.

We may use analytic companies to gather information and aggregate data from our Website visitors such as which pages are visited and how often they are visited, and to enable certain features on our Websites. Information is captured using various technologies and may include cookies.

We may use and disclose your activity information unless restricted by this policy or by law. Some examples of the ways we use your activity information include:

- Customizing your experience on the Website including managing and recording your preferences.
- Product development, and research purposes.
- Tracking resources and data accessed on the Website.
- Developing reports regarding Website usage, activity, and statistics.
- Assisting users experiencing Website problems.
- Enabling certain functions and tools on this Website.
- Tracking paths of visitors to this Website and within this Website.

**IF YOU DO NOT WISH TO HAVE COOKIES PLACED ON YOUR COMPUTER, YOU SHOULD SET YOUR BROWSERS TO REFUSE COOKIES BEFORE ACCESSING THE WEBSITES, WITH THE UNDERSTANDING THAT CERTAIN OF THE SERVICES AND CERTAIN FEATURES OF THE WEBSITES MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF COOKIES. IF YOU REFUSE COOKIES, YOU ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.**

#### **YOUR PERSONAL INFORMATION**

The Websites may include web pages that give you the opportunity to provide us with personal information about yourself. You do not have to provide us with personal information if you do not want to; however, that may limit your ability to use certain functions of the Websites or to request certain services or information. Personal Information that is collected from you through Customer Registration, Product or Services Purchases, data collection forms, and/or Surveys is used and disclosed as described in this Privacy Policy. Except as specifically set forth in this Privacy Policy, Company DOES NOT share personal information with third parties. Company may share aggregated information from time to time with its partners, vendors or other third parties. When such aggregate information is shared by Company, no personal information is shared. We may use personal information for a number of purposes such as:

- To respond to an email or particular request from you.
- To personalize the Website for you.
- To contact you directly.
- To process an application as requested by you.
- To administer surveys and promotions.
- To provide you with information that we believe may be useful to you.
- To perform analytics and to improve our products, Websites, and advertising.
- To comply with applicable laws, regulations, and legal process.
- To protect someone's health, safety, or welfare.
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action, such as to enforce our Terms of Use.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law.

We may supplement the personal information you provide with additional personal information gathered from public sources or from third-parties (e.g., consumer reporting agencies) who may lawfully

provide such information to Company. You are under no obligation to provide personal information, with the caveat that your refusal to do so may prevent you from using certain of the features and services available on the Websites or for us to contact you.

If you are a resident of the European Economic Area ("EEA"), you can **object** to processing of your personal information, ask us to **restrict** processing of your personal information, or request **portability** of your personal information where it is technically possible. You can exercise these rights by contacting us at [info@acceleratedretention.com](mailto:info@acceleratedretention.com)

### **PRODUCT OR SERVICE PURCHASES**

When a customer or registered customer purchases products or services from us through any of our Websites, the purchaser must provide us with certain personal information. This information is used for billing and payment purposes and to fill orders.

### **INFORMATION THAT YOU MAKE PUBLIC**

The Websites may contain features (e.g., public profiles, forums, and message boards) that permit you to upload, post, transmit, display, perform or distribute content, information or other material, including some of your personal information. Any information that you choose to disclose by means of such features becomes public information over which Company is unable to exercise any control. You should exercise caution when deciding to disclose your personal information by any means and you agree to assume all responsibility for doing so.

### **INFORMATION USE AND DISCLOSURE PRACTICES**

Company analyzes Traffic Data and information gathered using cookies to help Company better understand who is using the Website and how they are using it. By identifying patterns and trends in usage, Company is able to better design the Website to improve your experience, and to serve you more relevant and interesting content. From time to time, Company may release Traffic Data and information gathered using cookies in the aggregate, such as by publishing a report on trends in the usage of the Website. Company does not attempt to link information gathered using Cookies to personal information.

### **SHARING INFORMATION**

Except under the following circumstances and otherwise as set forth in this Privacy Policy, Company will only share your personal information with third parties as outlined in this policy and as otherwise permitted by law.

We may share personal information if all or part of the Company is sold, merged, dissolved, acquired, or in a similar transaction.

We may share personal information in response to a court order, subpoena, search warrant, law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting activities that are illegal, violate our rules, or may be harmful to other visitors.

If you submit information or a posting to a chat room, online forum, bulletin board, or similar "chat" related portion of this Website, the information you submit along with your screen name will be visible to all visitors, and such visitors may share with others. Therefore, please be thoughtful in what you write and understand that this information may become public.

We may also share personal information with other third-party companies that we collaborate with or hire to perform services on our behalf. For example, we may hire a company to help us send and

manage email, and we might provide the company with your email address and certain other information in order for them to send you an email message on our behalf. Similarly, we may hire companies to host or operate some of our Websites and related computers and software applications.

Company discloses personal information to those who help it provide services, including those who perform technical, administrative and data processing tasks such as hosting, billing, fulfillment, and data storage and security, when required by law or to protect rights. Company discloses personal information in response to a subpoena or court order, or when Company believes in its sole discretion that disclosure is reasonably necessary to protect the property or rights of Company.

When legally required by law enforcement, judicial and administrative agency disclosures, Company will provide confidential and personally identifiable information as necessary to comply with judicial and administrative orders, subpoenas, civil or criminal investigative demands, administrative and regulatory demands and other legal obligations. In order for Company to conduct business in certain jurisdictions, Company must disclose certain personally identifiable and confidential information to regulatory authorities in such jurisdictions. Such information may include, but is not limited to, income information and personally identifiable information.

Company reserves the right to transfer all personal information in its possession to a successor organization in the event of a merger, acquisition, or bankruptcy or other sale of all or a portion of Company's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred personal information will be subject to this Privacy Policy, or to a new privacy policy if you are given notice of that new privacy policy and opportunity to affirmatively opt-out of it.

Personal information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by Company's successor organization, if any.

If you have failed to pay any balance owed in consideration of products or services, Company may, as permitted by law, report your personal information, including without limitation, your unpaid balance, to consumer credit reporting services, collection agencies and others.

Company occasionally may assign prospective sales to independent contractors. In these cases, Company or the independent contractor will provide you with the appropriate independent contractor's name and contact information.

#### **COMMUNICATIONS FROM US**

When registering as customer or making a purchase or other inquiry or submitting personal information through the Websites, you consent to receive periodic email and other communications from us, including SMS, and from Company independent contractors. You will occasionally receive information on products, services, special deals, and a newsletter.

On rare occasions it is necessary to send out a strictly service-related announcement. For instance, if our service is temporarily suspended for maintenance we might send you an email. These communications are not promotional in nature.

Company may communicate with you via email and telephone to provide requested services or with respect to products or services purchased by you from Company or to provide you with information about Company's products and services. Such communications may be by email, SMS, or telephone.

## **LINKS**

Company Websites may contain links to other sites. Please be aware that Company is not responsible for the privacy practices of such other sites. We encourage users to be aware when they leave our site and to read the privacy statements of each and every Website that collects personal information. This privacy statement applies solely to information collected by Company Websites.

## **SECURITY**

Company has implemented and maintains reasonable security procedures and practices to protect against the unauthorized access, use, modification, destruction or disclosure of your personal information.

## **LOST OR STOLEN INFORMATION**

You must promptly notify us if your credit, banking, other financial information, user name or password is lost, stolen or used without permission. In such an event, we will remove that credit card number, bank account information, other financial institution information, user name or password from your account.

## **PROMOTIONAL ACTIVITIES**

From time to time, Company may conduct contests, giveaways and other promotions (collectively, "Promotional Activities"). Any information submitted in connection with Promotional Activities will be treated in accordance with this Privacy Policy.

From time to time, Company may also ask you to participate in surveys designed to help Company improve the Websites, its products or services. Any personal information provided to Company in connection with any survey will be used only in relation to that survey and will be disclosed to third parties not bound by this Privacy Policy only in aggregated form.

## **CHANGES TO THIS PRIVACY POLICY**

Company reserves the right to amend or change this Privacy Policy at any time at its sole discretion. It is your responsibility to periodically access this Privacy Policy by clicking on the Privacy Policy link at our Website. You can determine the date this Privacy Policy was last updated by referring to the effective date found in the footer.

## **MAKING CHANGES TO YOUR PERSONAL INFORMATION**

You may contact us at [info@acceleratedretention.com](mailto:info@acceleratedretention.com) make any changes to your personal information.

## **SOCIAL MEDIA DISCLAIMER**

We are under no obligation to screen or monitor your posts or any other content you post on any of our social media sites or pages; however, we may make a reasonable effort to monitor participation to ensure that you stay on topic, are courteous and avoid making offensive comments. Your posts and User content must adhere to the following requirements and cannot:

- Contain any third-party material including logos, drawings, tattoos, photographs, pictures, sculptures, paintings and other images or works of art, phrases, trademarks, trade secrets or other items without explicit prior written permission to use such materials.
- Contain sexually explicit, graphic, gratuitous or unnecessarily violent content or defamatory or derogatory content against any ethnic, racial, gender, religious, sexual orientation, professional or age group or contain any pornographic or nude material.

- Contain any private information about yourself or any other individual, including without limitation, information related to the health of the individual, financial information about the individual or any identification or account numbers related to the individual, with or without their permission or consent.
- Contain any software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software, hardware or telecommunications equipment.
- Contain any advertising, promotional materials, "junk mail," "spam," "chain letters," or "pyramid schemes" or promote illegal activity or illegal contests, sweepstakes, or gambling, including any online casino, sports books, bingo, poker or any other form of solicitation.
- Contain any material that, through any form of communication with the press, public, clients or media, disparages Company or its employees, contractors, directors, instructors, owners, officers and creators, in any way. Forms of communication include but are not limited to social media Websites, public forums, suppliers, vendors, clients, interviews, or recorded statements. You agree and understand that disparagement includes but is not limited to critiques, derogatory statements, ridicule, slander, jokes or insults at the expense of the company, management, senior personnel, independent contractors, products or services.
- Anyone violating this prohibition will be subject to loss of position, title, status, benefits, wages, prestige, influence, and suspension, up to and including termination

We reserve the right to edit comments for content, remove off-topic contributions, delete offensive comments or remarks, block offensive contributors and delete actual or suspected spam content from any social media site. Please be aware that once you post something online, there is the potential for numerous individuals to read your words, even years from now. Therefore, we suggest that you exercise caution when posting on any of our social media sites and that you not disclose personally identifiable information such as your location, medical record number, personal medical information, financial information, etc. We are not responsible for the content of any comments or responses posted by others to any website or social media site, if any, managed or monitored by Company. We do not control the placement of any marketing or advertising displayed on our pages by social media or third-party organizations.

We reserve the right to respond to any post or user content and may occasionally, privately request your contact information to assist offline with your consent by routing the matter to the appropriate persons or department for further handling.

## QUESTIONS

Questions regarding this Policy should be directed to [info@acceleratedretention.com](mailto:info@acceleratedretention.com)