



DaVinci Education, Inc. Privacy Policy

Last Updated: May 21, 2020

DaVinci Education, Inc. and its affiliates and subsidiaries (collectively, "DaVinci Education," "we," "our," or "us") are committed to protecting your privacy. We have prepared this Privacy Policy to describe our practices regarding the information processed by our website ("Site") and any other DaVinci Education products that may link to this Privacy Policy (collectively "Products"). This Privacy Policy is generally applicable to all of DaVinci Education's Products unless otherwise specified.

DaVinci Education's privacy policy, as provided below, describes the types of personal information that DaVinci Education collects, the types of third parties to which it discloses personal data, and the purposes for which it does so.

DaVinci Education collects contact and demographic information to respond to requests or to personalize and deliver the Site. DaVinci Education may transfer this information to third parties acting as an agent on its behalf. To learn more about the choices you have over your personal information, please see the subsection below entitled, "Your Choices Regarding Your Personal Information."

With respect to personal data received or transferred, DaVinci Education is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, DaVinci Education may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

DATA YOU PROVIDE TO US. We may collect information from you, such as first and last name, e-mail address, professional title and company name when you log in to our Site. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail. When you participate in one of our surveys, we may collect additional profile information.

We may also collect other types of personal and/or demographic information that you provide to us voluntarily.

DATA COLLECTED VIA TECHNOLOGY. Our servers (which may be hosted by a third-party service provider) collect information from you, including browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit. We also use cookies and web beacons (as described below) and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit to our Site and the solutions and information for which you searched and which you viewed. Like most Internet services, we automatically gather this data and store it in log files each time you visit our website. We may link this automatically-collected data to personally identifiable information. Our use of information received from Gmail APIs will adhere to Google's Limited Use Requirements.

"COOKIES" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site.

"WEB BEACONS" are digital images we use to log information on our Site and in our emails. We use web beacons to manage cookies, count visits, and to learn what marketing works and what does not. We also use web beacons to tell if you open or act on our emails.

"FLASH COOKIES" are used to store your preferences such as volume control or to display content based upon what you view on our Site to personalize your visit. Third party partners who provide certain features on our Site, such as videos, may place Flash cookies on your device. Flash cookies are different from other cookies because of the amount of, type of, and way in which data is stored. Cookie management tools provided by your browser usually will not remove Flash cookies. To learn more about Flash cookies, who has placed Flash cookies on your device, and how to manage privacy and storage settings for Flash cookies click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118. We do not permit third parties who place or track

Flash cookies to use the personal information they collect for advertising or marketing purposes.

Most web browsers are set to accept cookies by default. If you prefer, you can typically remove and reject cookies from our Site with your browser settings. If you remove or reject our cookies, it may affect how our Site works for you.

ANALYTICS. We use analytics services to help analyze how users use our Site. These services use cookies and scripts to collect and store information such as how users interact with our Site, errors users may encounter when using our Site, device identifiers, how often users visit our Site, what pages they visit, and what other sites they used prior to coming to our Site. We use the information we get from Google Analytics only to improve our Site and Products. We do not tie the information gathered using third-party analytics to your personally identifiable information. Please see the following links for more information about Google Analytics: http://www.google.com/privacy_ads.html, <http://www.google.com/privacy.html>, and <http://www.google.com/analytics/tos.html>.

BLOGS/FORUMS. Our Products may offer a publicly accessible blog and/or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

USE OF YOUR DATA. In general, personal information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. DaVinci Education uses your personal information in the following ways: to create and maintain your account; to identify you as a user in our Site; to operate, maintain, and improve our Site and Products; to personalize and improve your experience; to send you administrative e-mail; to respond to your comments or inquiries; to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and to make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback with your permission.

DISCLOSURE OF YOUR PERSONAL INFORMATION. We will share your personal information with third parties only in the ways that are described in this privacy policy or with your consent.

AFFILIATES. Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control (collectively, "AFFILIATES"), we may in the future. We may share some or all of your information with these Affiliates, in which case we will require our Affiliates to honor this Privacy Policy.

THIRD PARTY SERVICE PROVIDERS. We may share your personal information with third-party service providers for the sole purpose of providing you with the services that we offer you through our Site. For example, we may share data with service providers who host our websites or provide email services on our behalf.

OTHER DISCLOSURES. DaVinci Education may disclose information about you if it believes such disclosure is necessary to (a) comply with laws or to respond to lawful requests and legal process; or (b) protect or defend the rights, safety, or property of DaVinci Education, users of the Site or Products, or any person including to enforce our agreements, policies, and terms of use or (c) in an emergency to protect the personal safety of any person.

We may also share information about you in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company. In the event that information is shared in this manner, notice will be posted on our Site.

We may also use de-identified and/or aggregated data for our own use to improve the Site and Products.

SOCIAL NETWORKING PLATFORMS. We may allow you to connect and share information with certain social networking platforms ("SOCIAL NETWORKING PLATFORMS") (e.g., a Facebook application). By choosing to use these Social Networking Platforms, you allow DaVinci Education to share information with the Social Networking Platform. For example, you might use an application to publish DaVinci Education related notices on your Facebook wall. If you do not want us to continue to provide your information to the Social Networking Platform, you may change your privacy settings in the Social Networking Platform.

You can also access certain features of our Site using Social Networking Platforms. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name, email address, and other personal information to pre-populate an application.

We do not control the privacy practices of the Social Networking Platforms and sign-in services you choose to use and this privacy policy does not cover their practices. You should visit the privacy policies of any Social Networking Platform or sign-in service you choose to use to understand their practices.

SECURITY OF YOUR PERSONAL INFORMATION. DaVinci Education takes reasonable steps to help protect your personal information in an effort to prevent unauthorized access, use, or disclosure. Despite these measures, you should know that DaVinci Education cannot fully eliminate security risks associated with personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Any content you post while using the Site is at your own risk.

CONTACT INFORMATION. DaVinci Education welcomes your comments or questions regarding this Privacy Policy. Please e-mail us at privacy@davinci-ed.com or contact us at the following address or phone number:

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CHANGES TO THIS PRIVACY POLICY. DaVinci Education may change this Privacy Policy from time to time. If we make any changes to this Policy, we will change the "Last Updated" date above. If such changes are material, a notice of the changes will be posted along with the revised Privacy Policy. We encourage you to visit this page from time to time for the latest on our privacy practices.