

## ROSETTA STONE ReFLEX WEBSITE PRIVACY POLICY

The [reflex.rosettastone.com](http://reflex.rosettastone.com) website ("Site") is owned and operated by Rosetta Stone Ltd. ("RSL" or "we"). RSL is committed to safeguarding your privacy, and this Privacy Policy explains our data collection, use, and disclosure practices. By accessing or using either Site, and any of the content or services provided through either Site, you signify that you have read, understand, and accept the terms of this Privacy Policy. As used in this Policy, the term "the Site" refers to the specific Site that you are accessing or using. If you have specific questions about this Privacy Policy, please contact us by email at [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).

### 1. Information Collected

We receive and store any information you enter through the Site or give us in any other way. This includes information that can identify you ("personal information"), including your first and last name, telephone number, postal and email addresses. We also may ask you to provide additional information about yourself, including your age, hobbies, and interests in learning languages. You can choose not to provide this additional information to us, but in general some information about you is required in order for you to subscribe to or register and participate in the features offered through the Site.

Except for your personal information as described above, RSL reserves the right to record, read, copy, disclose, and otherwise use any text, speech, data, images, video and other materials that you transmit orally or by text or post to or through the Site or any of its components.

We automatically collect some information about your computer when you visit the Site. For example, we will collect your IP address, Web browser software (such as Mozilla Firefox or Internet Explorer), and the referring web site. We also may collect information about your activity on this Site, such as the classes, games or chat rooms in which you participate. One of our goals in collecting this automatic information is to help improve your user experience. Finally, when you visit the Site, we may assign your computer a "cookie" (a small, unique identifier text file) to remember who you are. For example, if you register on the Site, we may record your password in a cookie for verification purposes. We also may include other information in our cookie files; for example, if you arrived at the Site via a link from third party site, we may include the URL of the linking page.

Please note that, at this time, [reflex.rosettastone.com](http://reflex.rosettastone.com) is not designed for children under 14 years old. Accordingly, RSL will not knowingly collect or maintain personal information from children under 14 through [reflex.rosettastone.com](http://reflex.rosettastone.com).

### 2. Use of Personal Information

We will use personal information about you for the following general purposes: to process your subscription or registration to the Site; to provide you with the products and services you request; to tailor your learning experience; to respond to your questions and comments; to communicate with you via phone, regular mail and email (or other electronic means) about our programs and services; to measure interest in and improve our services and Site; to solicit information from you, including through surveys; to resolve disputes, collect fees, or troubleshoot problems; to prevent potentially illegal activities; to enforce our Terms of Use; and otherwise as described to you at the point of collection. Please review "Your choices with respect to the Collection and Use of Personal Information" below.

### 3. Disclosure of Personal Information

We display your profile information (minus your email address and password) to other community members of the Site and to support other Site functions. We also may disclose your personal information as follows:

- (a) For processing orders, registrations and inquiries related to the Site;
- (b) Third-party vendors who provide services or functions on our behalf, including customer service, business analytics, marketing, and services to us in connection with operating the Site. These companies have access to personal information needed to perform their functions and are not permitted to share or use the information for any other purpose;

- (c) To business partners with whom we may jointly offer a product or service offering. You can tell when a third party is involved because the third party's name will appear on informational materials. If you choose to take advantage of these offerings, we may share information about you, including personal information, with those named partners. Please note that we do not control the privacy practices of these third-party business partners;
- (d) When advisable or necessary to conform to legal and regulatory requirements;
- (e) As necessary, in RSL's sole discretion, to protect the perceived rights, safety and property of RSL, the Site's hosts and carriers, users of the Site, and the public;
- (f) As necessary for resolving disputes, collecting fees, and troubleshooting problems;
- (g) In connection with a change of control or operations, including without limitation in any merger, acquisition, reorganization, restructuring or any other transfer of RSL's assets, or a transfer of the Site operations;
- (h) Otherwise with your consent; and
- (i) With respect to 'Studio', to our instructors, to tailor their instructional materials and interactions with you.

Other than as set out above, you will be notified when personal information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information. We also may share aggregate or anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors to the Site. This information does not contain any personal information and is most often used to develop content and services that we hope you find of interest.

#### **4. A Special Word about Chat Rooms and Email**

Please keep in mind that whenever you voluntarily disclose personal information online, that information can be collected and used by others. By posting personal information online or disclosing such information in 'voice chats' with other when using the Site, that information can be seen, collected and used by others besides us. RSL cannot be responsible for any unauthorized third party use of such publicly-accessible information.

#### **5. Access to Personal Information**

You may obtain a copy of any personal information about you that you provide through the Site or otherwise request that RSL update or make changes to such personal information by sending an email to [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).

#### **6. Your Choices with Respect to the Collection and Use of Personal Information**

- (a) As noted above, you can choose not to provide RSL with personal information, although it may be needed to register as a member on the Site and to participate in certain features or services offered through the Site.
- (b) You can access or update your personal information by sending an email to [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).
- (c) You may stop the delivery of commercial email communications that RSL sends by following the instructions accompanying a particular communication or by contacting us at [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com).
- (d) The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

In addition, RSL will comply with the mandatory requirements of the applicable laws of any state, federal or other governmental jurisdiction regarding your personal information.

#### **7. Security**

You should be aware that there is always some risk involved in transmitting information over the Internet. While no website can guarantee security, RSL has implemented reasonable administrative, technical, and physical security procedures to help protect personal information from loss, misuse or alteration by

unauthorized third parties. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions.

## **8. Transfer of Data**

The Internet is a global environment. Using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. When you provide RSL with personal information through the Site, the information will be stored on servers located in the United States and possibly other countries. When we collect personal information from you on our website, we comply with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union.

## **9. Children Under 14 Using [reflex.rosettastone.com](http://reflex.rosettastone.com).**

As noted above, [reflex.rosettastone.com](http://reflex.rosettastone.com) is not intended for use by children under fourteen (14). Our current policy is not to knowingly collect personal information from children under the age of fourteen (14) for [reflex.rosettastone.com](http://reflex.rosettastone.com). If we become aware that we have inadvertently received personally identifiable information from a user under the age of fourteen (14), we will use that information only to respond directly to that child to inform him or her that the Site is not intended for children under the age of 14 and we will delete that information from our records. Because we do not collect any personally identifiable information from children under the age of fourteen (14) as part of the Site, we also do NOT knowingly distribute such information to third parties. We do NOT knowingly allow children under the age of fourteen (14) to publicly post or otherwise distribute personally identifiable contact information through the Site.

Because we do not collect any personally identifiable information from children under the age of fourteen (14) as part of the Site, we do NOT condition the participation of a child under fourteen (14) in the Site's online activities on providing personally identifiable information.

## **10. Third Party Websites**

Websites to which this Site links do not operate under this Privacy Policy. We recommend that you examine the privacy statements posted on those other web sites to understand their procedures for collecting, using, and disclosing personal information.

## **11. Changes to This Privacy Policy**

RSL may update this Privacy Policy in the future to reflect changes in our privacy practices, our website functionality, or applicable legislation, so please check back often. We will notify you about material changes to this Privacy Policy by sending a notice to the email address you provided to us or by placing a prominent notice on the Site.

## **12. How You Can Contact Us**

If you have questions about this Privacy Policy, please email us at <mailto:privacyofficer@rosettastone.com>. You may request a copy or send a correction of the personal information we hold about you by contacting the Privacy Officer at [privacyofficer@rosettastone.com](mailto:privacyofficer@rosettastone.com) or writing to:

Privacy Officer  
Rosetta Stone Ltd.  
135 West Market Street  
Harrisonburg VA 22801  
USA

If you wish to report communications or actions of other users that you believe may be in violation of this Privacy Policy or our Terms of Use, you may contact RSL by clicking on the "Report Abuse" link at the bottom of the Site's webpages.

This Privacy Policy is effective as of May 10, 2011.

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