Rosetta Stone Website Privacy Policy

Rosetta Stone Ltd. ("Rosetta Stone") is the developer of the Rosetta Stone[®] technology-based learning solutions. We take the privacy of our customers seriously. We are committed to safeguarding your privacy while providing a personalized and valuable service.

Para la versión en español, haga clic aquí

1. Overview

This Privacy Policy statement explains the data processing practices of Rosetta Stone. We are committed to the privacy and security of personal information we receive and process, and for appropriately and promptly addressing requests and instructions regarding personal data, in accordance with applicable legal requirements. In order to better ensure the proper handling of data requests, we have created a Personal Information Request web form to enable us to support requests from individuals seeking information and action with respect to personal data we have collected for those individuals and how we use that information. If you are contacting us to request information or action with respect to personal data we have collected about you, or to exercise your data protection rights, we ask that you

please click [here]

and submit your request(s) through the Personal Information Request web form.

If you have any other requests concerning your personal information or any questions about these practices please contact our Privacy Officer by e-mail at <u>privacyofficer@RosettaStone.com</u>. We encourage you to periodically review this statement as it may change at any time at our sole discretion.

Our site contains links to third party sites, which are not subject to this privacy policy. Rosetta Stone does not endorse and is not responsible for the privacy practices or content on these sites. We recommend that you read the privacy policy of any such sites that you visit.

Information provided by you may be requested from one of our websites under the Rosetta Stone or Rosetta World brand names, or from one of our reputable co-marketing partner sites that represent our brands on their own websites under their company and/or brand name. In the event that you provide us with personal information for the purposes of free registration and you later make a purchase, whether directly from us or facilitated by one of our e-commerce partners, your privacy rights will be protected according to our stated policies and the stated privacy policies of these partners, which will be posted and available for your review at the time of purchase.

2. Information Collected

Personal information is collected by Rosetta Stone. We collect personally identifiable information about you (your "Data") through:

• The use of inquiry and registration forms.

- The purchase process when you buy any of our products or services
- The provision of your details to us either online or offline

The elements of your Data that we collect may include:

- Name
- Job title
- Company name
- Home, shipping and billing addresses, phone and fax number
- Mobile telephone number
- E-mail address
- IP address and browser information
- Payment details such as credit card information
- Market research data such as customer usage patterns

3. Use and Disclosure of Personal Information

We use your Data for purposes which may include:

- Providing our customers with a personalized service.
- Processing orders, registrations and inquiries.
- Conducting market research surveys.
- Running competitions.
- Measuring interest in and improving our website, products, and services.
- Providing you with information about products and services we offer. You may stop the delivery of marketing emails by following the instructions accompanying a particular communication or by using our Personal Information Request web form available here: [link].
- Resolving disputes, collecting fees, and troubleshooting problems.

We use the information you provide when placing an order to complete that order. We do not share this information with outside parties except 1. To the extent necessary to complete that order or to provide you with services by way of our service providers (e.g., payment processing, third-party shipping, business analytics, customer support), or 2. To successors in title to our business, or 3. In accordance with legal and regulatory requirements, or 4. As necessary, in Rosetta Stone's sole discretion, to protect the perceived rights, safety and property of Rosetta Stone, users of our websites, and the public, or 5. With the parent organization, affiliate or subsidiary entities of Rosetta Stone to manage and control Data as joint users.

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 use information in aggregate form (so that no individual user is identified):

• To build up marketing profiles

- To aid strategic development
- To audit usage of the site

4. Use and Disclosure of Personal Information in Japan

In Japan, in addition to the foregoing, we may also share Data collected through digital distribution marketplaces like the Apple App Store with Joint Providers. "Joint Providers" are those companies which we've partnered with to offer, support, or manage Rosetta Stone and/or Joint Provider Accounts, products or services, and to manage and control Data, subject to Rosetta Stone and/or Joint Provider privacy policies.

In Japan, the Joint Provider in charge of managing jointly used Data is Sourcenext Corporation.

5. Use of Cookies and Other Tracking Devices

We use cookies and other tracking devices, including local shared objects written with Adobe flash technology (flash cookies), to help personalize your use of our sites. A cookie is a small piece of information which is sent to your computer's hard drive by the web server so that the website can remember who you are. This information may include information relating to your use of our sites, information about your computer such as the computer's IP address and browser type, demographic data and, if you arrived at our site via a link from a third party site, the URL of the linking page. We do not use any tracking devices to track your usage of the Internet on other sites not operated by Rosetta Stone. If you are a registered user this may include your name and email address for verification purposes.

We use information from cookies for purposes which may include:

- Identifying returning users and registrants
- Enabling you to move more easily around our site
- Tracking your use of our site to better develop our sites in accordance with your requirements
- Building up a demographic profile
- If you do not want to help us learn how to improve our site, products, offers and marketing strategy, you may choose to set your Web browser to not accept cookies. Further information on how to prevent cookies from being stored on your computer can be found on http://www.allaboutcookies.org under the 'manage cookies' section. Alternatively, go to the help menu within your Internet browser. Flash cookies may be removed using the latest versions of Google Chrome, Mozilla Firefox, and Microsoft Internet Explorer, which you may upgrade to on these browsers, or you may remove or block flash cookies by going to Adobe's Website Storage Settings Panel.

From time to time we may permit third party companies to set cookies on Rosetta Stone sites for purposes which may include market research, revenue tracking or to improve functionality of the site.

6. Security Policy

Rosetta Stone has appropriate measures in place to help ensure that our users' Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security systems.

7. 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. For individuals located in the European Union, we participate in the EU-U.S. and Swiss-U.S. Privacy Shield Framework (the "Framework") as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from the European Union and Switzerland. For more information about our certification to the Framework, please click here: http://www.rosettastone.com/privacy-shield, or to visit the U.S Department of Commerce site please click here: https://www.privacyshield.gov/welcome.

8. Access to Data and Contact Info

You may request a copy or send a correction of the personal information we hold about you by contacting the Privacy Officer at <u>privacyofficer@RosettaStone.com</u> or writing to:

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

Where required by applicable law, and notably by GDPR, you have the right to obtain confirmation of the existence of certain Personal Data relating to you, to verify its content, origin, and accuracy, as well as the right to access, review, port, delete, or to block or withdraw consent to the processing of certain Personal Data (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. In particular, you have the right to object to our use of Personal Data for direct marketing and in certain other situations at any time. Contact us below for more details. Please note that certain Personal Data may be retained as required or permitted by applicable law.

If you are an End User receiving access to our services through a Corporate, Governmental, Educational or other Organizational Enterprise Client of Rosetta Stone, and you wish to request access, limit use, limit disclosure or remove your End User Personal Data, please contact the Enterprise Client organization that submitted your personal data to us, and we will support them as needed in responding to your request.

If you are contacting us to request information or action with respect to personal data we have collected about you, or to exercise your data protection rights, please click [here] and submit

your request(s) through our Personal Information Request web form. If you have other questions or requests concerning your personal information, please contact the Privacy Team by email at privacyofficer@rosettastone.com.

If you are a European resident with questions regarding your rights in Personal Data under GDPR, please contact the Rosetta Stone Data Protection Officer, Sofia Simoes, by email at <u>DPO@rosettastone.com</u>.

- (a) As noted above, you can choose not to provide Rosetta Stone with personal information, although it may be needed to register as a member on the Service and to participate in certain features offered through the Service.
- (b) You can access or update your personal information by using our Personal Information Request web form available here: [link].
- (c) You may stop the delivery of commercial email communications that Rosetta Stone sends by following the instructions accompanying a particular communication or by using our Personal Information Request web form available here: [link].
- (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.

We may charge the allowable fee under applicable law for provision of this information.

9. Children Under 13

We do not intentionally collect any information on children under 13 years of age. We will undertake to delete any details of such users where a parent or guardian has notified us that any such details have been obtained.

10. California Consumers

Notice to California Consumers

This notice is effective as of January 1, 2020

If you reside in California, we are required to provide additional information to you about how we use and disclose your information, and you may have additional rights with regard to how we use your information. We have included this California-specific information below.

- CA Personal Information. Consistent with section 2 of this <u>Website Privacy</u> <u>Policy</u>, we collect certain categories and specific pieces of information about individuals that are considered "Personal Information" in California ("CA Personal Information"), specifically:
 - **Personal and Other Identifiers or Characteristics**: such as first name and

last name, personal or professional contact information, mailing address, telephone number, e-mail address, unique personal identifier, IP, device, and online activity information, age, date of birth, gender, demographics, username and password to our Websites or services;

- **Commercial Information:** such as payment details, credit card information and purchase or transaction history.
- Sources. We may collect certain categories of CA Personal Information from you and other third parties as described in sections 4 and 5 of this <u>Website Privacy Policy</u>.
- Use of CA Personal Information. Consistent with sections 3, 4 and 5 of this <u>Website Privacy Policy</u>, we may use CA Personal Information for business or commercial purposes. Please see sections 3, 4 and 5 for more details.
- CA Personal Information Sold or Disclosed For Business Purposes.
 - In the preceding twelve months, we may have shared CA Personal Information for business purposes, or we may have "sold" (as defined under CCPA) some categories of CA Personal Information.
- California Consumer Rights. Subject to certain exceptions, as a California resident, you may have the following rights to your CA Personal Information: (i) *Access*. Request access to your CA Personal Information that we collect, use, disclose, or sell; (ii) *Deletion*. Request deletion of your CA Personal Information; and (iii) *CA Personal Information Sold or Disclosed For Business Purposes*. Request information about the CA Personal Information we have "sold" (as defined under CCPA) or disclosed for business purposes within the preceding 12 months. To the extent permitted by applicable law, we may be required to retain some of your CA Personal Information and certain CA Personal Information is strictly necessary in order for us to fulfil the purposes described in this Privacy Policy.
- Exercising California consumer rights. If you are a California resident and wish to exercise any of these rights, please: (a) submit your request using our California webform available [here]; (b) log into your account to make any updates or submit a request; (c) contact us as described in the <u>Website Privacy Policy</u>

section 8 above, or (d) call the following toll-free number 800-280-8172. When submitting your request, you may be asked to provide certain information, which may include additional proof of identification, so that we can verify your identity and validate the request. We are not responsible for requests that are not sent or submitted properly, or that do not have complete information. Please note that you are limited by law in the number of requests you may submit per year. We will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon you exercising your rights to your CA Personal Information.

• Do Not Sell My Personal Information. If we "sell" (as defined by CCPA) your CA Personal Information to a third party, as a California Resident, you have the right to opt-out of the sale of your CA Personal Information. If you wish to exercise this right, please click [here], contact us as described in the <u>Website Privacy Policy</u> section 8 above, or call the following toll-free number 800-280-8172. To the extent that you elect to designate an authorized agent to make a request on your behalf, they must identify that they are contacting us as agent and will be required to provide appropriate documentation including written signed authorization by you, proof of your identity, and verification of their identity; or a valid, designated power of attorney as required under the California Probate Code. We may require additional proof of authority or may need to contact you directly to validate the request. If you are under the age of 16, we will not sell your CA Personal Information without proper consent.

11. Changes to this Policy

This policy is effective January 1, 2020. From time to time we may make changes to this privacy policy statement to reflect any changes to our privacy practices in accordance with changes in legislation, best practice or website enhancements. 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 our website.

Last reviewed: January 1, 2020 Last updated and effective as of: January 1, 2020

Política de privacidad del sitio web de Rosetta Stone

Rosetta Stone Ltd. ("Rosetta Stone") es el desarrollador de las soluciones de aprendizaje basadas en tecnología Rosetta Stone[®]. Tomamos muy en serio la privacidad de nuestros clientes. Nos hemos comprometido a proteger su privacidad mientras le ofrecemos un servicio valioso y personalizado.

1. Descripción general

La declaración de esta Política de privacidad describe las prácticas de procesamiento de datos de Rosetta Stone.

Estamos comprometidos con la privacidad y seguridad de la información personal que recibimos y procesamos, y con el tratamiento adecuado y rápido de las solicitudes e instrucciones relativas a los datos personales, de acuerdo con los requisitos legales aplicables. Con el fin de garantizar mejor el tratamiento adecuado de las solicitudes de datos, hemos creado un formulario web de solicitud de información personal que nos permite apoyar las solicitudes de las personas que buscan información y acciones con respecto a los datos personales que hemos recopilado para esas personas y la forma en que utilizamos esa información. Si se pone en contacto con nosotros para solicitar información o emprender acciones con respecto a los datos personales que hemos recopilado sobre usted, o para ejercer sus derechos de protección de datos, le pedimos que

por favor haga clic[aquí]

y envíe su(s) solicitud(es) a través del formulario web de Solicitud de Información Personal.

Si desea formular otra solicitud en relación con su información personal o tiene alguna pregunta sobre estas prácticas, envíe un correo electrónico a nuestro director de privacidad a privacyofficer@RosettaStone.com. Lo invitamos a que revise con frecuencia esta declaración, ya que podemos modificarla en cualquier momento a nuestro absoluto criterio.

Nuestro sitio contiene enlaces a sitios de terceros, que no están sujetos a esta política de privacidad. Rosetta Stone no avala las prácticas de privacidad ni el contenido de dichos sitios, y tampoco se responsabiliza por ellos. Le recomendamos leer la política de privacidad de los sitios mencionados que visite.

Los sitios web de la marca Rosetta Stone o Rosetta World, o alguno de nuestros prestigiosos socios de comercialización conjunta que representan nuestras marcas en sus sitios web bajo sus propias marcas o compañías, pueden solicitar información suministrada por usted. En el caso de que usted nos suministre información personal para registrarse de forma gratuita y posteriormente haga una compra, directamente a nosotros o a través de uno de nuestros socios de comercio

electrónico, sus derechos de privacidad serán protegidos de acuerdo con nuestras políticas y las políticas de privacidad de dichos socios, las cuales estarán publicadas y disponibles para su lectura al momento de la compra.

2. Información recopilada

Rosetta Stone recopila información personal. Nosotros recopilamos información de identificación personal sobre usted (sus "Datos") a través de:

- El uso de formularios de registro y consultas;
- El proceso de compra cuando usted adquiere cualquiera de nuestros productos o servicios;
- El suministro de datos en línea o por otro medio por parte de usted.

Los Datos que recopilamos de usted pueden incluir lo siguiente:

- Nombre
- Cargo
- Nombre de la compañía
- Dirección particular, de envío y de facturación, número de teléfono y fax
- Número de teléfono móvil
- Dirección de correo electrónico
- Dirección IP e información del navegador
- Datos de pago como información de tarjetas de crédito
- Datos de investigación de mercado como patrones de uso de consumidores

3. Uso y divulgación de información personal

Nosotros usamos sus Datos para propósitos que pueden incluir lo siguiente:

- Ofrecer a los clientes un servicio personalizado.
- Procesar pedidos, registros y consultas.
- Llevar a cabo encuestas de investigación de mercado.
- Realizar concursos.
- Medir el interés y mejorar nuestro sitio web y los productos y servicios.
- Proporcionarle información sobre los productos y servicios que ofrecemos. Si desea dejar de recibir correos electrónicos de comercialización, siga las instrucciones de la comunicación en particular o utiliza nuestro formulario web de Solicitud de Información Personal disponible aquí: [link];
- Resolver conflictos, cobrar cargos o solucionar problemas.

La información que usted suministra al hacer un pedido, se utiliza para procesar ese pedido. Nosotros no compartimos esa información con terceros, excepto en los siguientes casos: 1. En la medida en que sea necesario para procesar el pedido o para proporcionarle servicios a través de nuestros proveedores de servicios (por ejemplo, procesamiento de pagos, envío a terceros, análisis de negocios, soporte al cliente), o 2.A sucesores legítimos de nuestra empresa, o 3. De conformidad con los requisitos legales y regulatorios, o 4. Si es necesario, a criterio absoluto de

Rosetta Stone, para proteger los derechos percibidos, la seguridad y la propiedad de Rosetta Stone, los usuarios de nuestros sitios web y el público en general, o 5. Con la empresa matriz o las afiliadas o subsidiarias de Rosetta Stone para la administración y el control de los Datos como usuarios conjuntos.

Excepto en los casos mencionados, antes de compartir información personal de usted con terceros, recibirá una notificación y tendrá la oportunidad de solicitar que no lo hagamos.

También usamos información en forma agrupada (para que no se identifique a ninguna persona en particular):

- Para crear perfiles de comercialización
- Para contribuir al desarrollo estratégico
- Para auditar el uso del sitio

4. Uso y Divulgación de Información Personal en Japón

En Japón, además de lo anterior, también podemos compartir datos recopilados a través de mercados de distribución digital como la App Store de Apple con Proveedores Conjuntos. "Proveedores Conjuntos" son aquellas compañías con las que hemos colaborado para ofrecer, soporte, o administrar cuentas, productos o servicios de Rosetta Stone y / o Proveedores Conjuntos, y para administrar y controlar Data, sujeto a la privacidad de Rosetta Stone y / o Proveedores Conjuntos Políticas.

En Japón, el Proveedor Conjunto encargado de administrar los Datos utilizados conjuntamente es SourceNext Corporation.

5. Uso de cookies y otros dispositivos de seguimiento

Para personalizar el uso de nuestros sitios, usamos cookies y otros dispositivos de seguimiento que incluyen objetos locales compartidos creados con tecnología Adobe Flash (cookies flash). Una cookie es una pequeña cantidad de información que el servidor web envía al disco duro de su computadora para que el sitio web pueda recordar quién es usted. Esta información puede incluir datos relacionados con el uso que usted hace de nuestros sitios, información sobre su computadora como la dirección IP y el tipo de navegador, datos demográficos y, si accede a nuestro sitio a través de un enlace ubicado en un sitio de terceros, la URL de la página que contiene dicho enlace. Los dispositivos de seguimiento no se usan para registrar el uso de Internet en otros sitios no operados por Rosetta Stone. Si es un usuario registrado, la información de cookies puede incluir su nombre y dirección de correo electrónico para fines de verificación.

La información de cookies se puede utilizar para los siguientes propósitos:

- Identificar a personas registradas o a usuarios que vuelven a ingresar
- Permitirle navegar con más facilidad en nuestro sitio
- Hacer un seguimiento del uso del sitio para mejorar el desarrollo de nuestros sitios de acuerdo con sus necesidades

- Crear un perfil demográfico
- Si no desea ayudarnos a saber cómo mejorar el sitio y nuestros productos, ofertas y estrategia de comercialización, puede configurar su navegador web para no aceptar cookies. Podrá encontrar más información sobre cómo evitar el almacenamiento de cookies en la computadora en <u>http://www.allaboutcookies.org</u>, en la sección "Manage cookies" (Administrar cookies). También, puede ir al menú de ayuda de su navegador de Internet. Las cookies flash se pueden eliminar usando las últimas versiones de Google Chrome, Mozilla Firefox y Microsoft Internet Explorer, que se pueden actualizar en estos navegadores, o también puede eliminarlas o bloquearlas desde el Panel de Configuración de almacenamiento de sitios web de Adobe.

Ocasionalmente, podemos permitir a compañías de terceros instalar cookies en los sitios de Rosetta Stone para fines de investigación de mercado, seguimiento de ingresos o para mejorar la funcionalidad del sitio.

6. Política de seguridad

Rosetta Stone ha implementado las medidas correspondientes para proteger los Datos de sus usuarios contra el acceso o el uso no autorizado, la alteración, la destrucción accidental o ilícita y la pérdida accidental. Si bien hacemos esfuerzos razonables para proteger su información personal contra la pérdida, el uso indebido o la alteración por parte de terceros, debe saber que la transmisión de información por Internet siempre conlleva riesgos. También existe el riesgo de que nuestros sistemas de seguridad sean boicoteados por ladrones.

7. Transferencia de datos

La Internet es un entorno mundial. El uso de Internet para recopilar y procesar Datos personales implica, necesariamente, la transmisión de Datos a nivel internacional. En lo que atañe a personas radicadas en la Unión Europea, participamos en el Acuerdo de escudo de la privacidad entre EE. UU. y Suiza y entre EE. UU. y la UE ("Acuerdo"), tal como lo establece el Departamento de Comercio de EE. UU. con respecto a la recopilación, el uso y la retención de datos personales provenientes de Suiza y la Unión Europea. Para obtener más información sobre nuestra certificación en el Acuerdo, haga clic aquí: <u>http://www.rosettastone.com/privacy-shield</u>, o visite el sitio del Departamento de Comercio de EE. UU. en: <u>https://www.privacyshield.gov/welcome</u>.

8. Acceso a datos y a información de contacto

Si desea solicitar una copia o enviar una corrección de la información personal que tenemos sobre usted, comuníquese con el director de privacidad a <u>privacyofficer@RosettaStone.com</u>, o diríjase por escrito a:

Privacy Officer Rosetta Stone Ltd. 135 West Market Street Harrisonburg VA 22801 USA Cuando así lo requiera la legislación aplicable, y especialmente el RGPD, usted tiene derecho a obtener la confirmación de la existencia de ciertos datos personales relacionados con usted, verificar su contenido, origen y exactitud, así como el derecho de acceso, revisión, portabilidad, eliminar o bloquear o retirar el consentimiento para el procesamiento de ciertos datos personales (sin afectar la legalidad del procesamiento basado en el consentimiento antes de su retirada), poniéndose en contacto con nosotros como se detalla a continuación. En particular, tiene derecho a oponerse a nuestro uso de los datos personales para el marketing directo y en ciertas otras situaciones en cualquier momento. Contáctanos a continuación para más detalles. Tenga en cuenta que ciertos datos personales pueden ser retenidos según lo requerido o permitido por la ley aplicable.

Si usted es un Usuario Final que recibe acceso a nuestros servicios a través de una Empresa Corporativa, Gubernamental, Educativa u otro Cliente Empresarial Organizacional de Rosetta Stone, y desea solicitar acceso, limitar el uso, limitar la divulgación o eliminar sus Datos Personales del Usuario Final, contáctese con La organización cliente que nos envió sus datos personales, y los apoyaremos cuando sea necesario para responder a su solicitud.

Si se pone en contacto con nosotros para solicitar información o emprender acciones con respecto a los datos personales que hemos recopilado sobre usted, o para ejercer sus derechos de protección de datos, haga clic [aquí] y envíe su(s) solicitud(es) a través de nuestro formulario web de solicitud de información personal. Si tiene otras preguntas o solicitudes sobre su información personal, comuníquese con el Equipo de Privacidad por correo electrónico a privacyofficer@rosettastone.com.

Si es un residente europeo con preguntas sobre sus derechos en Datos personales bajo RGPD, comuníquese con el Delegado a le protección de datos (DPD) de Rosetta Stone, Sofia Simoes, por correo electrónico a <u>DPO@rosettastone.com</u>.

- (a) Como se indicó anteriormente, usted tiene la opción de no proporcionar sus datos personales a Rosetta Stone, aunque puede ser necesario para inscribirse como miembro del Servicio y participar de ciertas funciones que se ofrecen a través del Servicio.
- (b) Usted puede acceder o actualizar sus datos personales utilizando nuestro formulario web de Solicitud de Información Personal disponible aquí: [link].
- (c) Usted puede hacer que Rosetta Stone deje de enviarle mensajes comerciales por correo electrónico siguiendo las instrucciones que aparecen en tales mensajes o utilizando nuestro formulario web de Solicitud de Información Personal disponible aquí: [link].

(d) En la sección "Ayuda" de la barra de herramientas de la mayoría de los navegadores encontrará cómo evitar que el navegador acepte nuevas "cookies", cómo hacer que el navegador le avise cuando usted recibe una "cookie" nueva o cómo desactivar completamente las "cookies".

Por el suministro de dicha información, se podrá cobrar un cargo según lo permitan las leyes aplicables.

9. Menores de 13 años

Nosotros no recopilamos de manera intencional información sobre personas menores de 13 años. En los casos en que un padre o tutor nos notifique que se han recopilado datos de este tipo, procederemos a eliminar tales datos.

10. Residentes de California

Notice to California Consumers

This notice is effective as of January 1, 2020

If you reside in California, we are required to provide additional information to you about how we use and disclose your information, and you may have additional rights with regard to how we use your information. We have included this California-specific information below.

- CA Personal Information. Consistent with section 2 of this <u>Website Privacy</u> <u>Policy</u>, we collect certain categories and specific pieces of information about individuals that are considered "Personal Information" in California ("CA Personal Information"), specifically:
 - **Personal and Other Identifiers or Characteristics**: such as first name and last name, personal or professional contact information, mailing address, telephone number, e-mail address, unique personal identifier, IP, device, and online activity information, age, date of birth, gender, demographics, username and password to our Websites or services;
 - **Commercial Information:** such as payment details, credit card information and purchase or transaction history.
 - Sources. We may collect certain categories of CA Personal Information from you and other third parties as described in sections 4 and 5 of the of this <u>Website Privacy Policy</u>.
- Use of CA Personal Information. Consistent with sections 3, 4 and 5 of this <u>Website Privacy Policy</u>, we may use CA Personal Information for business or commercial purposes. Please see sections 3, 4 and 5 for more details.
- CA Personal Information Sold or Disclosed For Business Purposes.
 - In the preceding twelve months, we may have shared CA Personal Information for business purposes, or we may have "sold" (as defined under CCPA) some categories of CA Personal Information.

- California Consumer Rights. Subject to certain exceptions, as a California resident, you may have the following rights to your CA Personal Information: (i) *Access*. Request access to your CA Personal Information that we collect, use, disclose, or sell; (ii) *Deletion*. Request deletion of your CA Personal Information; and (iii) *CA Personal Information Sold or Disclosed For Business Purposes*. Request information about the CA Personal Information we have "sold" (as defined under CCPA) or disclosed for business purposes within the preceding 12 months. To the extent permitted by applicable law, we may be required to retain some of your CA Personal Information and certain CA Personal Information is strictly necessary in order for us to fulfil the purposes described in this Privacy Policy.
- Exercising California consumer rights. If you are a California resident and wish to exercise any of these rights, please: (a) submit your request using our California webform available [here]; (b) log into your account to make any updates or submit a request; (c) contact us as described in the <u>Website Privacy Policy</u> section 8 above, or (d) call the following toll-free number 800-280-8172. When submitting your request, you may be asked to provide certain information, which may include additional proof of identification, so that we can verify your identity and validate the request. We are not responsible for requests that are not sent or submitted properly, or that do not have complete information. Please note that you are limited by law in the number of requests you may submit per year. We will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon you exercising your rights to your CA Personal Information.
- **Do Not Sell My Personal Information**. If we "sell" (as defined by CCPA) your CA Personal Information to a third party, as a California Resident, you have the right to opt-out of the sale of your CA Personal Information. If you wish to exercise this right, please click [here], contact us as described in the *Website Privacy Policy* section 8 above, or call the following toll-free number 800-280-8172. To the extent that you elect to designate an authorized agent to make a request on your behalf, they must identify that they are contacting us as agent and will be required

to provide appropriate documentation including written signed authorization by you, proof of your identity, and verification of their identity; or a valid, designated power of attorney as required under the California Probate Code. We may require additional proof of authority or may need to contact you directly to validate the request. If you are under the age of 16, we will not sell your CA Personal Information without proper consent.

11. Cambios en esta política

Esta política entra en vigencia a partir del 1 de Enero de 2020. Cada cierto tiempo, podemos hacer modificaciones en la declaración de esta política de privacidad a fin de reflejar los cambios que hubiere en nuestras prácticas de privacidad, en consonancia con los cambios en la legislación, las mejores prácticas o las mejoras del sitio web. Cuando haya cambios sustanciales en esta Política de privacidad, le enviaremos una notificación a la dirección de correo electrónico que nos suministró o publicaremos un aviso destacado en nuestro sitio web.

Última revisión: 1 de Enero de 2020 Última actualización y efectiva a partir de: 1 de Enero de 2020