



## Security and Privacy Policy

Last Updated May 25, 2016

### SCOPE

This Policy is maintained by Remote-Learner Inc. on behalf of itself, its parent entity and its US and non-US subsidiaries and divisions (collectively referred to herein as “Remote-Learner” or “we”), and applies to all current clients of Remote-Learner.

### DEFINITIONS

“Agent” means any third party that processes, collects, or uses Personal Information pursuant to the instructions of, and solely for the benefit of, Remote-Learner, or to which Remote-Learner discloses Personal Information for use on its behalf.

“Personal information” means information that can directly or indirectly lead to the identification of a living person, such as an individual’s name, e-mail, or other identifying characteristic. Personal information does not include information that has been made anonymous, encoded or otherwise stripped of its identifiers, or information that is publicly available, unless combined with other non-public personal information.

### INFORMATION WE COLLECT AND HOW WE USE IT

Any personal information sent to us by our clients is used exclusively for the purposes and services for which we contracted. We do not share, sell or rent that information to any other parties.

We may collect personal information such as name, title, firm, address, e-mail address, and survey results from individuals who have requested information from us or expressed interest in our products and services. You may provide this information to us electronically, over the Internet, or physically. Your

personal information will be used by Remote-Learner exclusively for the purpose of providing and improving services offered to you, or informing you of additional products and services which we think will be of interest to you.

Other information gathered through this site is purely statistical, such as what Web pages are visited most often. This information is useful to Remote-Learner and enables us not only to improve and upgrade our services but also to refine our product lines and marketing. This information is anonymous in nature.

We do not collect sensitive personal information (e.g., personal information specifying medical or health conditions, racial or ethnic origin, views or activities) or receive sensitive personal information from any third parties.

## CHOICES FOR PERSONAL INFORMATION

If you have provided us with your personal information and do not wish to receive further communications of information, products, or services from us, you can opt out by sending an email to: [unsubscribe@remote-learner.net](mailto:unsubscribe@remote-learner.net)

If you provide personal information to us as part of a service we provide to you or your organization, we do not share, sell or rent that information to any third parties except as described herein.

## INFORMATION SHARING

Remote-Learner only shares personal information with other companies or individuals outside of Remote-Learner under the following limited circumstances:

We provide personal information to trusted businesses or persons for the purpose of processing personal information on our behalf or providing the services on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this policy and any other appropriate confidentiality and security measures.

We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request; (b) enforce applicable terms of service, including investigation of potential violations thereof; (c) detect, prevent or otherwise address fraud, security or technical

issues; or (d) protect against imminent harm to the rights, property or safety of Remote-Learner, its users or the public as required or permitted by law.

## INFORMATION SECURITY

Remote-Learner employs appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access to personal information to Remote-Learner employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## DATA INTEGRITY

Remote-Learner processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

## ACCESSING AND UPDATING PERSONAL

## INFORMATION

When you use Remote-Learner services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning

information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

## ENFORCEMENT

Remote-Learner regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Policy or Remote-Learner's treatment of personal information by contacting us at the email or address specified below. When we receive formal written complaints at this address, it is Remote-Learner's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Remote-Learner and an individual.

## CHANGES TO THIS POLICY

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Policy changes). Each version of this Policy will be identified at the top of the page by its effective date.

## CONTACT INFORMATION

If you have any additional questions or concerns about this Policy, please feel free to contact us by sending an email to: [privacy@remote-learner.net](mailto:privacy@remote-learner.net) or at Privacy Matters, % Remote-Learner, 1550 Larimer Street, Suite 785, Denver, CO 80202, United States