

# Privacy Policy

LearnQuest and our subsidiaries and affiliates ("LQ", "we", "our" or "us") respect your preferences concerning the treatment of personal Information that we may collect. Such personal Information may include, but be not limited to, your name, physical address, telephone number, email address, company affiliation, and associated interests. This Policy lets you know how LQ collects and uses your information, how you may control its use, and how we collect information, such as through different LearnQuest websites, computer software, mobile software, social media pages, and HTML formatted email messages, as well as through offline sales and marketing activities (known collectively as "Channels.")

Our communications may provide links to or the ability to connect with non-LearnQuest websites, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share information about you. Such third-party websites or services are beyond our control. We encourage you to check the privacy policies and terms of use of any non-LQ websites or services before providing your personal Information to them.

## Information We Collect

Through your interactions with Channels, LQ may collect information that identifies an individual or relates to an identifiable individual. Besides collecting personal Information, LQ may also collect other information through your interaction with the Channels, which does not reveal your specific identity or does not directly relate to an individual. Other such information may include, but not be limited to, browser and device information, data collected through automated electronic interactions, application usage data, demographic information, location information, statistical and aggregated information.

Statistical or aggregated information does not directly identify a specific person, but it may be derived from personal information. For example, we may aggregate information to calculate the percentage of clients in a particular geographical location.

In some instances, we may combine other information with personal information, such as combining a precise geographical location with your name. If we combine other information with personal information, we will treat the combined information as personal Information.

## How LearnQuest Uses Information

LearnQuest uses and shares personal information it collects unless otherwise restricted by applicable law, to:

- **Engage in Transactions** – We may use personal information to engage in transactions with you.
- **Process transactions** – We may use personal information along with financial, credit card, and payment information to process your transactions.
- **Provide Support/Services** – We may use your personal information to provide you support or other services you have ordered.
- **Post Testimonials** – We may post testimonials on our Channels that may contain personal information. Before posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update or delete your testimonial, please be sure to let us know.
- **Improve Products, Services, and Experiences** – We may use your personal information to evaluate and improve our products, services, marketing, and customer relationships.

- **Communicate with you about a Conference or Event** – We may communicate with you about a conference or event hosted or co-sponsored by LQ or one of our partners. This may include information about the event's content, logistics, payment, updates, any additional meetings, or other customer facilitation that we may provide related to your event registration. After the event, LQ may contact you about the event and related services and products and may share information about your attendance with your company where legally permitted. Please note that our partners or conference sponsors may directly request your personal information at their conference booths or presentations. You should review their privacy policies to learn how they handle personal information.
- **Obtain Third Party Services** – We also share personal information with third parties who provide services to LearnQuest, such as credit card processing services, order fulfillment, event/campaign management, website management, IT and related infrastructure provisioning, customer service, email delivery, auditing, cloud storage, and other similar services. When LQ shares information with third-party service providers, we require that they use personal information only to provide services to us and subject to terms consistent with this Policy.

In order for you to benefit from quality services and products we engage contractors to process data on our behalf. These contractors are bound by confidentiality and other contractual requirements to keep your data safe and secure e.g., day to day operations [Microsoft 365](#). These contractors process specific categories of personal data to help us organize events, manage business information and contracts, store data, analyze and organize data. With each of these contractors we have contractual agreements which ensure that your personal data is protected and that the processing of personal data is protected and used only as necessary to perform the contracted services.

- **Comply with Legal Requirements and Corporate Transactions** – We may disclose your personal information as we believe to be necessary or appropriate (a) under applicable law, including laws outside your country of residence, including all applicable privacy laws including but not limited to HIPAA, CCPA, and GDPR; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings), we may transfer the personal information we have collected to the relevant third party.
- **Other Information** - We may use, transfer, and disclose other information we collect for any purpose, except where applicable law requires otherwise. If we are required to treat other information as personal information under applicable law, we will only use it in the same way that we are permitted to use and disclose personal information.

## How We Collect Information

- **Direct Interactions** – From your use of and interaction with us through Channels and other activities such as account creation, submission of registrations and forms, or sales inquiries and transactions.
- **Publicly Available Data / Data from Third Parties** - Other data you may have made publicly available, such as social media posts or data provided by third-party sources, such as marketing opt-in lists or data aggregators.

- **Automated Interactions** - From the use of technologies such as electronic communication protocols, cookies, embedded URLs or pixels, widgets, buttons, or tools. Although LQ's use of automated interactions may change over time as technology evolves, the following descriptions are designed to provide you with additional detail about LQ's current approach to information collected from automated interactions.
- **Electronic Communications Protocols** - As is true when you visit most websites and applications, LQ may automatically receive from you as part of the communication connection itself, which often consists of network routing information, equipment information, your IP address, and date and time. LQ may also automatically receive and record information about your interaction with the Channels, such as clickstream information or general geo-location data.
- **Cookies** - LQ's servers will query your browser to see any "cookies" previously set by our electronic channels. Cookies may collect information, including a unique identifier, user preferences, profile information, membership information, and general usage and volume statistical information. Cookies may also be used to collect individualized web site use data, provide electronic Channel personalization, or conduct and measure the effectiveness of advertising in accordance with this Policy. Some cookies may remain on users' computers after they leave the website. While the majority are set to expire within 1-24 months of your last visit to the website that set the cookie, others may not expire because of their nature, like cookies that remember opt-out preferences. Your browser may provide you with information and control over your cookies. You can set your browser to alert you when a cookie is being used and accept or reject the cookie. You can also set your browser to refuse all cookies or accept only cookies returned to the originating servers. However, cookies are essential to the proper function of a site and disabling them may degrade your experience and interfere with web site features and customization. LQ has engaged one or more third-party service providers to track and analyze both individualized usage and volume statistical information from interactions with electronic Channels. The service provider(s) set cookies on behalf of LQ. LQ also uses other third-party cookies to provide advertising and personalization services in accordance with this Policy and to track the performance of LQ advertisements on their websites and LQ emails.
- **Embedded URLs** - LQ may use a tracking technique that employs embedded URLs to allow the use of electronic channels without cookies. Embedded URLs allow limited information to follow you as you navigate the electronic channels but are not associated with personal information and are not used beyond the session.
- **Embedded Pixels & Similar Technologies** - On the electronic channels, LQ and its service providers may use embedded pixel technologies for the purpose of identifying unique user visits (as opposed to aggregate hits) and for advertising purposes. Furthermore, embedded pixels or other technologies may be used in emails and our online display advertising to provide information on when the email or ad was opened to track marketing campaign responsiveness; information collected using the technologies may be associated with the recipient's email address.
- **Widgets, Buttons & Tools** - Our electronic channels may include widgets, which are interactive mini-programs that run on our site to provide specific services from another company (i.e., links to bookmarked sites), along with buttons or other tools that link to other companies' services (i.e., a "Like" button or third party map). The widget, button, or tool may collect and automatically send personal information, such as your email address, or other information (such as browser information or IP address), to a third party. Cookies may also be set or used by the widgets, buttons, or tools to enable them to function properly or for other purposes, including advertising. information collected or

used by a widget, button, or tool, including cookie setting and preferences, is governed by the company's privacy policy that created it.

- **Physical Location** - We may collect your device's physical location and use it to provide you with personalized location-based services or content. In some instances, you may be permitted to allow or deny such use of your device's location. Still, if you choose to refuse such use, we may not be able to provide you with the applicable personalized services or content.

## **Disclosure of Information**

Depending on the requested Services or as necessary to complete any transaction or provide any service you have requested, we may share your information with your consent with our trusted third parties that work with LQ, any other affiliates and subsidiaries we rely upon to assist in the operation of the Website and Services available to you. We do not share personal information with unaffiliated third parties. These service providers are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. We may share your personal information for these purposes only with third parties whose privacy policies are consistent with ours or who agree to abide by our policies with respect to personal information. These third parties are given personal information they need only in order to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes.

We will disclose any personal information we collect, use or receive if required or permitted by law, such as to comply with a subpoena or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

## **Retention of Information**

LearnQuest will retain your personal information for as long as your account is active; as needed to provide you products and services; as needed for the purposes outlined in this Policy or at the time of collection; as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements; or to the extent permitted by law.

## **Transfer of Information**

Depending on your location, data transfers may involve transferring and storing your information in a country other than your own. You are entitled to learn about the legal basis of information transfers to a country outside the European Union (EU) or the European Economic Area (EEA) or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by us to safeguard your information. If any such transfer takes place, you can find out more by checking the relevant sections of this Policy or inquire with us using the information provided in the contact section.

## **Advertising**

LearnQuest uses some third parties to administer a limited set of LQ advertisements on third party electronic channels. No personal information is provided to the advertisers as part of this process. Still, aggregate profile information may be used to select advertising to make sure that it has relevance to the user. In some ads, an embedded pixel may be present. While it does not associate with a cookie or other

personal information, it may return session connection information that allows advertisers to determine better how many individual users have clicked on the ad.

## **The Rights of Users**

You may exercise certain rights regarding your information processed by us. In particular, you have the right to do the following: (i) you have the right to withdraw consent where you have previously given your consent to the processing of your information; (ii) you have the right to object to the processing of your information if the processing is carried out on a legal basis other than consent; (iii) you have the right to learn if information is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the information undergoing processing; (iv) you have the right to verify the accuracy of your information and ask for it to be updated or corrected; (v) you have the right, under certain circumstances, to restrict the processing of your information, in which case, we will not process your information for any purpose other than storing it; (vi) you have the right, under certain circumstances, to obtain the erasure of your personal information from us; (vii) you have the right to receive your information in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that your information is processed by automated means and that the processing is based on your consent, on a contract which you are part of, or on pre-contractual obligations thereof.

## **The Right to Object to Processing**

Where personal information is processed for the public interest, in the exercise of an official authority vested in us or for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection.

## **Data Protection Rights Under GDPR**

If you are a subject of the European Union (EU) or the European Economic Area (EEA), or are accessing the site from these territories, you have certain data protection rights under the Regulation (EU) 2016/679. LearnQuest aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your personal information. If you wish to be informed of what personal information, we hold about you and if you want it to be removed from our systems, please contact us. In certain circumstances, you have the following data protection rights:

- You have the right to request access to your personal information that we store and have the ability to access your personal information.
- You have the right to request that we correct any personal information you believe is inaccurate. You also have the right to request us to complete the personal information you believe is incomplete.
- You have the right to request the erase your personal information under certain conditions of this Policy.
- You have the right to object to our processing of your personal information.
- You have the right to seek restrictions on the processing of your personal information. When you restrict the processing of your personal information, we may store it but will not process it further.
- You have the right to be provided with a copy of the information we have on you in a structured, machine-readable, and commonly used format.

- You also have the right to withdraw your consent at any time where LearnQuest relied on your consent to process your personal information.
- You have the right to complain to a Data Protection Authority about our collection and use of your personal information. Please contact your local data protection authority in the European Economic Area (EEA) for more information.

To exercise your rights under the GDPR, you can send a request to our data protection officer at [Privacy.Compliance@learnquest.com](mailto:Privacy.Compliance@learnquest.com) for access to your personal data. We will always verify the identity of the person who is making such a request before handing over any information. Confirmation will be asked from the data subject using the email they used to create their LearnQuest account. If you no longer have access the e-mail address you used to create your LearnQuest account, please contact us at [Privacy.Compliance@learnquest.com](mailto:Privacy.Compliance@learnquest.com) so that we can provide additional instructions.

One copy, per year, of your data will be provided free of charge. However, the data subject will be charged a fee for each additional copy. We will aim to provide the relevant data within 14 days.

### **Requests for Erasure**

When you submit a request for the erasure of your data, we will anonymize all the personal information in a manner that ensures no identification of the data subject. The anonymized data is only used by LQ for analytic purposes, such as the number of participants in a training course event or the number of certified individuals for a certain period of time.

Please keep in mind that we do not erase all your information since we need to adhere to specific legal obligations such as financial transactions and accreditation requirements. If you are certified as a result of taking training from LQ or hold any of the credentials we offer and request the erasure of your information, a digital copy of the certificate(s) and the financial invoice(s) will be stored and encrypted with limited access.

### **Automatic Erasure**

In accordance with data protection laws, we delete the accounts of inactive customers. If we haven't seen any activity from the customer in last 5 years and if we don't have any legal obligation for storing data, the automatic erasure will be performed.

### **California Privacy Rights**

In addition to the rights as explained in this Policy, California residents who provide personal information (as defined in the statute) to obtain products or services for personal, family, or household use are entitled to request and receive from us once a calendar year, information about the personal information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of personal information and the names and addresses of those businesses with which we shared such personal information for the immediately prior calendar year (e.g., requests made in the current year will receive information about the prior year). To obtain this information, please contact us.

## **How to Exercise These Rights**

Any requests to exercise your rights can be directed to LearnQuest through the contact details provided in this document. Please note that we may ask you to verify your identity before responding to such requests. Your request must provide sufficient information that allows us to verify that you are the person you are claiming to be or that you are the authorized representative of such a person. You must include sufficient details to allow us to understand the request and respond to it properly. We cannot respond to your request or provide you with personal information unless we first verify your identity or authority to make such a request and confirm that the personal information relates to you.

## **Privacy of Children**

We do not knowingly collect any personal information from children under the age of 18. If you are under 18, please do not submit any personal information through the Website and Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide personal information through the Website and Services without their permission. If you have reason to believe that a child under the age of 18 has provided personal information to us through the Website and Services, please contact us. You must also be at least 18 years of age to consent to your personal information processing in your country (in some countries, we may allow your parent or guardian to do so on your behalf).

## **Do Not Track Signals**

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, the Website and Services are not set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described in more detail throughout this Policy, we limit our use and collection of your personal information.

## **Email Marketing**

We offer electronic newsletters to which you may voluntarily subscribe at any time. We are committed to keeping your email address confidential and will not disclose your email address to any third parties except as allowed in the information use and processing section or for the purposes of utilizing a third-party provider to send such emails. We will maintain the information sent via email in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all emails sent from us will clearly state who the email is from and provide clear information on contacting the sender. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or contacting us. You will be removed from the mailing list until the next time you decide to update your subscription preferences voluntarily.

Upon unsubscribing, if you still decide to maintain your LQ account, you will still receive emails from the LearnQuest system related to your account setting, training, examination, and certification purposes.

## **Information Security**

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of personal information in its control and custody. However, no data transmission over the Internet or wireless network can be guaranteed. Therefore, while we strive to protect your personal information, you acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and the Website and Services cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

## **Data Breach**

In the event we become aware that the security of the Website and Services has been compromised or users' personal information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law. When we do, we will send you an email.

## **Data Protection Policy**

LearnQuest has established a Data Protection Policy stating, that employees, clients, resellers, and stakeholders' data is protected and handled accordingly and confidentially. Please read our full Data Protection Policy, which is available by request at [Privacy.Compliance@learnquest.com](mailto:Privacy.Compliance@learnquest.com).

## **Changes And Amendments**

We reserve the right to modify this Policy or its terms relating to the Website and Services from time to time in our discretion and will notify you of any material changes to the way in which we treat personal information. When we do, we will revise the updated date at the bottom of this page. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided. Any updated version of this Policy will be effective immediately upon posting the revised Policy unless otherwise specified. Your continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, without your consent, we will not use your personal information in a manner materially different than what was stated at the time your personal information was collected.

## **Acceptance of This Policy**

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services, you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services.



## Contacting Us

If you would like to contact us to understand more about this Policy or wish to contact us concerning any matter relating to individual rights and your personal information, you may send an email to [info@learnquest.com](mailto:info@learnquest.com).