

# Privacy Policy

## Introduction

This Privacy Policy (“Privacy Policy”) is specific to Authentic Learning Labs. At Authentic Learning Labs (“Authentic”, “we”, “us”, “our”, or the “Company”), we are committed to protecting your privacy. This Privacy Policy describes the types of information we collect about users of our websites and is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Services. This Privacy Policy also describes (1) the measures we take to safeguard the information we collect and (2) your rights and privileges concerning our collection, use and disclosure of information about you.

This Privacy Policy applies to websites owned and operated by Authentic Learning Labs. Throughout this document, this website, all other Authentic Learning Labs affiliated websites, and affiliates with links to this policy will be collectively referred to as the “Websites”. Services provided by or enabled via the Websites will be referred to as the “Services”.

Authentic Learning Labs is not responsible for the content or privacy practices of non-Authentic websites to which this website, or any other Authentic Learning Labs website, may link. Also, Authentic Learning Labs is not responsible for the privacy practices of our Clients or users of our Clients’ websites. You should review any additional privacy policy and terms of use agreements before using a Client’s website.

By using our Websites, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use our Websites.

## Authentic Learning Labs Software Platforms

In addition to the Websites, Authentic Learning Labs operates web-based software platforms, Songbird Analytics, Simpatico, Learning Experience Templates and API, and Shuttle Interactive Video, used by our Clients and individuals to provide access to a website for authorized individuals, including their employees and customers. The use of information collected through this platform is strictly limited to the purpose of meeting our contractual obligations to our Clients and providing the services requested by our Clients, which are defined within our service agreements.

If you are the customer of one of our Clients, you should refer to that Client’s privacy policy for information on how your personal information is collected, used and protected. Any inquiries related to your data, how it is processed, and data access, deletion and modification requests should be directed to that Client.

## Changes to the Privacy Policy

The data Authentic Learning Labs collects and uses is governed by this Privacy Policy as amended from time to time, not by the Privacy Policy in effect at the time of data collection. This includes data collected from Authentic Learning Labs Websites, affiliates with links to this Privacy Policy, and services provided by or enabled via these sites. Authentic Learning Labs may change the Privacy Policy at our sole discretion and will provide notice of changes in the Privacy Policy and on the privacy policy page of our Websites. If, as the result of such changes, you want to alter the ways in which we are allowed to use your personal information, you can do so by following the procedure described in the section entitled “Privacy Rights”.

Please regularly review our Privacy Policy. **If you have objections to the Privacy Policy, you should immediately discontinue use of the Websites and the Services enabled by the Websites.** This Privacy Policy does not govern privacy practices associated with offline activities, websites other than the Websites, or any products or services not available or enabled via the Websites.

You will be deemed to have been made aware of, and will be subject to, the changes to the Privacy Policy after such notice has been posted with the following exception: if at the time you provide personal information to Authentic Learning Labs you limit how such information will be used to communicate with you, either by Authentic Learning Labs or by third parties, Authentic Learning Labs will not change your preference in this regard without your express consent. However, if Authentic Learning Labs sells assets (or the assets of a division or subsidiary) to another entity, or Authentic Learning Labs (or a division or subsidiary) is acquired by or merged with another entity, you agree that Authentic Learning Labs may provide to such entity customer information that is related to that part of our business that was sold to or merged with the other entity without obtaining your further consent.

## Policy Regarding Children

Authentic Learning Labs Websites and Services are not designed for use by children under the age of 16. As such, this Website is not directed at children under the age of 16 nor do we knowingly collect or maintain information from children under the age of 16 on this Website.

## Collection and Use of Data

Authentic Learning Labs are the sole owners of the information collected on this website. We have access to and collect information that you voluntarily give us via email, webform or other direct contact from you. We will use your information to respond to you, regarding the reason you contacted us. We may disclose information to our corporate affiliates and third parties to provide products and services to you, or related to products or services you have purchased or downloaded from Authentic Learning Labs. Unless you ask us not to, we may contact you via email in the future to tell you about our services, new products, or changes to this privacy policy or to provide you with informational or educational newsletters.

Do not provide personal information about others unless you are authorized or required to do so by applicable law or contract. Before supplying personal information about others, you and the person about whom you supply the information must review and consent to the Terms of Use and Privacy Policy of the Website. By submitting any personal information about others, you represent and warrant that you are authorized to do so, that you have made the Terms of Use and Privacy Policy available to the person about whom you supply the information, and that you have obtained that person's written consent to our Terms of Use and Privacy Policy. If applicable law allows you to supply the information without doing the foregoing, you represent and warrant that you have abided by that law and that it allows us to receive and disclose the information under this Privacy Policy without any further action on our part. You agree to indemnify, defend and hold harmless Authentic Learning Labs, our parents, subsidiaries, officers, directors, employees and agents, sponsors and supporting artists, licensors and suppliers for any failure by you to comply with this paragraph.

## Personal Information and Business Information

"Personal Information" as used in this Privacy Policy is information that we directly associate with a specific person or entity, such as name, address, payment information (including payment card number, expiration date, cardholder name and CVV code), mobile telephone number, and email address.

The Personal Information you provide will vary based upon the context, and we will not collect your Personal Information unless you make it available. You are not required to provide Personal Information at any time while

visiting the Websites; however, you may be required to provide Personal Information to use certain Services. You may provide us with Personal Information by participating in online or emailed surveys, subscribing to newsletters and other recurring offerings through the Websites, and in connection with other products, services, features, or requests made available through the Websites.

Authentic Learning Labs collects the Business and Personal Information necessary to enable us to respond to your requests for our products and services and to send you information regarding our products and services from time to time. Since most of the users of our products and Websites are doing so in their capacity as potential employees, employees, employers or companies, most Business and Personal Information we collect will be in that capacity. For these purposes, we have defined "Business Information" as any information that identifies or may identify a job seeker (potential employee), company or an individual contact at a company or that allows others to contact a company or an individual contact at a company. When you visit our Websites, you may be asked to submit information such as e-mail address, company name, address, phone number, your product version and/or areas of interest. We may also ask you where you heard about our company or products, or for other information that will help us understand more about your needs or help us process your requests for information. In addition, we collect credit card and related payment information when you order products, services or support plans online. Our information collection and use practices are described in more detail below.

## Support

We offer certain limited online support services. If you access our online support, you may be asked for information such as customer ID, product name, product version and other information to help us determine what the technical issues are and how best to help you resolve them. In addition, certain products allow you to submit support-related questions directly from the product. If you access online support services from a product, information about your network, operating system, printer, data and program path, product type, version, customer ID, the product's technical support information sheet, product serial number and other similar information will be automatically pre-populated for submission to our customer support representatives to assist them in answering your questions.

## Product-Related Information Collection

Authentic Learning Labs collects certain additional information in connection with your use of our Services, web-based products and/or desktop products with online features. For instance:

- **Product Updates:** Some products provide you with the ability to download and register product and/or tax updates as they become available. During the download and registration process, we collect "Business Information", including customer ID number and product version, type and serial number. This is collected so that we can authorize your access, provide you with the appropriate update, and to update our records as to the product and products updates you have downloaded or installed, so that we may provide the appropriate support.
- **Account Set-Up and Access:** Upon subscribing to our services, Authentic Learning Labs collects Business Information, which may include information such as product serial number, customer ID and your customer profile information. This allows us to identify you to authorize your access and use of the services, and to provide you with your relevant account information. Certain products allow you to access your account to obtain information such as your support plan status, service subscriptions, registrations and order history.
- **Online Product /Account Application:** Certain products and services are subject to an application and enrollment process, which may be completed on paper or online. Information requested may include federal ID numbers, bank account, payroll, credit card and contact information. This information is used to process your enrollment request and, if approved, to set up and administer your account.
- **Web-based Services:** Some of our web-based Services collect certain additional information, including IP address, browser, connection speed, domain, referring URL and other environment-related information. This enables us to provide a secure environment for the use of the services, to pre-populate forms and calculate

aggregate statistical information about the customers using these services. We use this information to better protect you and to provide a better user experience.

## **Third-Party Products**

Authentic Learning Labs may use your Business Information to inform you of special discounts or offers from other companies we have carefully selected and whose products and services may be of interest to you.

Data retention for Third-Party Products and integrations: How long we retain your Personal Data depends on the type of data and the purpose for which we process the data. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

You may request to review, correct, delete, or otherwise modify any of the personal information that you have previously provided to us through third party integrations. Upon deleting or uninstalling the integration or products, requests to access, change, or delete your information will be addressed within a reasonable timeframe.

By calling these 3rd party products, you give us permission to store assets such as video and related data streams via terms of the 3rd party products. At any time, you may request deletion of data gathered via 3rd party products by direct request. See How to Contact Us section below.

## **Public Forums**

Information (including personal and business information) that you submit, post or otherwise reveal in a public forum (such as comments to a blog or product discussion forum) is not subject to this Privacy Policy, will be seen by third parties not related to Authentic Learning Labs and may be used by them or Authentic Learning Labs to contact you for any purpose.

## **Registrations**

To access information (blogs, demos of our products, marketing materials etc.) on the Websites, a user may be required to register with Authentic Learning Labs. During registration a user is required to give certain information (such as name, email address, job title). This information is used to contact you about the products/services on our website in which you have expressed interest.

## **Orders**

We request information from you on our order form. To buy from us, you must provide contact information (like name and shipping address) and financial information (like credit card number, expiration date). This information is used for billing purposes and to fill your orders. If we have trouble processing an order, we'll use this information to contact you.

## **Surveys and Contests**

From time-to-time, our Websites may request information via surveys or contests. Participation in these surveys or contests is completely voluntary and you may choose whether or not to participate and therefore disclose this information. Information requested may include contact information (such as name and shipping address), and demographic information (such as zip code). Contact information will be used to notify winners and award prizes, if applicable. Survey information will be used for purposes of monitoring or improving the use and satisfaction of the Website or for delivery of services.

## Cookies

Authentic Learning Labs may place “cookies” on the browser of your computer. Cookies are small pieces of information that are stored by your browser on your computer’s hard drive. Cookies may enhance the convenience and use of the Website. For example, the information provided through cookies may be used to recognize you as a previous user of the Website (so you do not have to enter your personal information every time), offer personalized information for your use, and otherwise facilitate your experience using the Website. You may choose to decline cookies if your browser permits, but doing so may affect your ability to access or use certain features of the Website.

Authentic Learning Labs may also utilize web beacons on our Websites. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. The information collected through these automated means may include information that we gather and store about your visit to, and use of, the Websites, such as your IP address, type of browser and operating system used, date and time you access the websites, pages you visit, and, if you linked to the Websites from another website, the address of that website. This data does not include Personal Information and is not treated as Personal Information under this Privacy Policy, but it may include the IP address of your device. We may link an IP address to information that is personally identifiable.

Most web browsers automatically accept cookies, but you can disable this function so that your browser will not accept cookies. Please be aware that disabling this function may impact your use and enjoyment of this Website.

## Third-Party Analytics

We may also allow certain third-party analytics service providers to include cookies and web beacons within the pages of the Websites on our behalf and to retain and use the information received from such cookies and web beacons themselves. Third-party service providers that collect this data on our behalf or on behalf of clients may offer information about their data collection practices.

### Do Not Track

Currently, various browsers — including Microsoft Edge, Google Chrome, Internet Explorer, Mozilla Firefox, and Apple Safari — offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to Web sites’ visited by the user about the user’s browser DNT preference setting. We do not currently commit to responding to browsers’ DNT signals with respect to the Company’s Web sites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. We take privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

## Protecting Data During Collection

We take precautions to protect your information. When you submit sensitive information via the Websites, your information is protected both online and offline. We use appropriate security measures to protect the security of your

data both online and offline. These measures vary based on the sensitivity of the information that we collect, process, store, and the current state of technology. Please note, though, that no website or internet transmission is completely secure, so while we strive to protect your data, we cannot guarantee that unauthorized access, hacking, data loss or a data breach will never occur.

## How We Use the Data We Collect

### Email Communication

Each email we send will contain instructions on how to unsubscribe should you decide not to receive future promotional e-mails. If you choose to opt-out of receiving promotional e-mail communications from any Authentic Learning Labs business unit, we may still periodically communicate with you via mail and telephone. Please allow up to 10 business days to be removed from our promotional e-mail list.

We send notification emails about the Website and Services from time to time as necessary. Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

We also send newsletters to our users with news of new service offerings and promotions. Should you change your mind about receiving these newsletters, you can unsubscribe by following the directions present in each email we send out.

Most of our communications are intended to:

- inform you of product upgrades and updates and subscription renewals;
- inform you of tax, regulatory and other compliance issues with your software product or service;
- notify you of products and services that we think may be of interest to you;
- offer you discounts or other promotions with respect to Authentic Learning Labs products and services that we think may interest you; and
- contact you for survey purposes to determine how we can better service you or provide better products to meet your needs.

### Third-Party E-Mail Promotions

If you access and/or use any of our Partner's services from a link on this Website, a Authentic Learning Labs/Partner co-branded website or by any other means, any information you reveal in connection with such service is submitted to our Partner and is not subject to this Privacy Policy. You should consult the privacy policy of any Partner or third-party website with respect to its treatment of any information that you may reveal through such service.

### Services and Product Data

Business Information collected by Authentic Learning Labs as set forth in the *Personal Information and Business Information* section above does not include your company's data entered in the course of operating our products ("Product Data") or data provided by you while using our services ("Services Data"). Authentic Learning Labs will not access your Product Data or Services Data except in the following limited circumstances:

- to provide you with technical support, solely at your request and with your permission;

- on a limited-access basis to install updates, produce regular backups or restore data from backups at your request;
- where the inherent purpose of the product or service requires Authentic Learning Labs to provide the Product Data or Services Data to a third party on your behalf (for example where Authentic Learning Labs makes tax filings on your behalf or initiates bank transfers on your behalf); and
- unless you opt-out, to utilize Aggregate Information derived from Product Data and Services Data to help us improve our products and services and in developing additional Aggregate Information is non-identifying information about you that is provided to third parties for analysis. For example, we might inform third parties regarding the number of users of this Website and the activities they conduct while on this Website to better understand user experience. Third-parties who receive aggregate information cannot identify or contact you based on the information they receive.

Authentic Learning Labs will not provide your Product Data or Services Data to any third-party or permit any third-party to access your Product Data or Services Data, except with your permission or to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order. In addition, if at any time you decide to discontinue your use of the applicable service, your Services Data will be destroyed and removed from all servers according to terms set forth in your Service Agreement, subject to applicable back-up and disaster recovery practices and procedures.

## How We Share Data

Unless you give us your permission, we don't share data we collect from you with third parties, except as described below:

**Third-party service providers or consultants.** We may share data collected from you on the Authentic Learning Labs Website with third-party service providers or consultants who need access to the data to perform their work on Authentic Learning Labs's behalf, such as a website analytics company or our third-party advertising partners. These third-party service providers are limited to only accessing or using this data to provide services to us and must provide reasonable assurances that they will appropriately safeguard the data.

**Compliance with Laws.** We may disclose your data to a third party if (i) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or government request (including to meet national security or law enforcement requirements), (ii) to enforce our agreements and policies, (iii) to protect the security or integrity of the Authentic Learning Labs Website or our services and products, (iv) to protect ourselves, our other customers, or the public from harm or illegal activities, or (v) to respond to an emergency which we believe in good faith requires us to disclose data to assist in preventing a death or serious bodily injury. If Authentic Learning Labs is required by law to disclose any of your data that directly identifies you, then we will use reasonable efforts to provide you with notice of that disclosure requirement, unless we are prohibited from doing so by statute, subpoena or court or administrative order. Further, we object to requests that we do not believe were issued properly.

**Affiliates.** We may share data collected from you from the Authentic Learning Labs Website with our affiliates. We all will only use the data as described in this notice.

**Business transfers.** If we go through a corporate sale, merger, reorganization, dissolution or similar event, data we gather from you through our website may be part of the assets transferred or shared in connection with due diligence for any such transaction. Any acquirer or successor of Authentic Learning Labs may continue to use the data we collect from you through our Website as described in this notice.

**Aggregated or de-identified data.** We might also share data collected from you from the Authentic Learning Labs Website with a third party if that data has been de-identified or aggregated in a way that does not directly identify you.

We do not share your data (including, but not limited to, the personal data of your end users) with third parties for their direct marketing purposes, unless you give us your consent to do so.

### **Cross Border Transfers of Data**



Authentic Learning Labs's headquarters are in the United States and as such, data may be transferred to the United States from the European Economic Area ("EEA"), Switzerland, or another country that requires legal protections for international data transfer. Personal data will be transferred to the United States only: to fulfill contractual obligations to you; with your consent; or to fulfill a compelling legitimate interest of Authentic Learning Labs, in a manner that does not impeach on your rights and freedoms. We make every effort to ensure the security and protection of the data we transfer.

Authentic Learning Labs is committed to protecting the privacy of personal data and adherence to Global Data Protection laws. Authentic Learning Labs designs its products and services with privacy in mind and takes into account internationally recognized security and privacy standards for the benefit of all of its customers in Europe and around the world. These same principles continue to apply to protection of international transfers of personal data.

If you have any questions, please do not hesitate to reach out to [help@authenticlearninglabs.com](mailto:help@authenticlearninglabs.com)

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## Privacy Rights

We may retain your information for a period of time consistent with the original purpose of collection. For instance, we may retain your information during the time in which you have an account to use our Websites or Services and for a reasonable period afterward. We also may retain your information during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

You may opt out of any future contacts from us at any time. Additionally, if the collection of your personal data was based on your consent, you have the right to revoke that consent at any time. Be aware that by revoking consent, you may lose access to services you previously opted to use.

You may request to review, correct, delete, or otherwise modify any of the personal information that you have previously provided to us through the Company's Website(s) and Services. You can do the following at any time by contacting us via the email address or phone number provided on our website:

- See what data we have about you, if any
- Change/correct any data we have about you
- Have us delete any data we have about you
- Express any concern you have about our use of your data

Requests to access, change, or delete your information will be addressed within a reasonable timeframe.

## California Residents' Privacy Rights

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To request a copy of such information, please contact us as described in the "Questions, Concerns or Complaints" section below, and we will respond within 30 days as required by law.

## How to Contact Us



Authentic Learning Labs commits to resolve complaints about our collection or use of your personal information. Authentic Learning Labs takes its users' privacy concerns seriously.

If you believe that Authentic Learning Labs has not complied with this Privacy Policy with respect to your personal information, you should first contact us at Authentic Learning Labs by emailing us at [help@authenticlearninglabs.com](mailto:help@authenticlearninglabs.com) or by writing to the Authentic Learning Labs Privacy Officer at the following address:

Authentic Learning Labs

Attn: Authentic Learning Labs Privacy Officer

101 W 22nd St

Suite 106

Lombard, IL 60148

USA

**In your letter, please include that you are inquiring about Authentic Learning Labs**, and describe in as much detail as possible the ways in which you believe that the Privacy Policy has not been complied with. We will investigate your complaint promptly.

Please note that Authentic Learning Labs is not responsible for the content or privacy practices of non- Authentic Learning Labs websites to which this Website or any other Authentic Learning Labs website may link. Also, Authentic Learning Labs is not responsible for the privacy practices of its customers or users of its customer websites. You should review the additional privacy policy of the customer website before using the website.