

# Privacy Policy

Last updated May 2018

## **Introduction**

We take your privacy seriously. Our privacy policy as stated below covers our collection of personal information in different forms as well as our use and disclosure of such information. We employ practices and processes that are designed to keep us in compliance with applicable privacy laws and good business practices when it comes to safeguarding the confidentiality of your personal information.

## **What this policy covers**

This privacy policy covers the collection, use, storage, treatment and disclosure of personal information we collect when you visit or use any of the software platforms or websites that are owned, published or operated by Health Scholars, Inc. (individually, the “website” and collectively, the “websites”). It also covers personal information disclosed to us when you register for a subscription for services with us via mail, our websites, or telemarketing. This policy does not describe privacy policies and practices of websites and platforms that we do not provide, including those linked to, or integrated with, our websites. It also does not cover personal information you may choose to share with other users of our websites.

By using our websites, you signify your consent to the collection, use, storage, treatment and disclosure of your personal information in accordance with this policy. If you do not agree with this policy, do not use our websites. For EU users, you may affirmatively opt in to such collection, use, storage, treatment, or disclosure.

## **Children’s personal information**

Our websites and subscription efforts are not directed to children under the age of 16. We do not knowingly collect any personal information concerning or from children under the age of 16.

## **Non-personally identifiable information we collect**

From time to time we automatically collect certain non-personally identifiable information when you visit any one of our websites, such as, the time and date of your visit, the pages that you access, the website from which you linked to our website, the sections of the website you visit, and the number of times you return to the website. This information is not used to identify you, but is used in the aggregate for our internal marketing, system administration, website improvements and other similar purposes.

## **Cookies**

Our website uses Cookies. Cookies are small text files that are downloaded to the browser of a computer, tablet or smartphone used to visit a website. A Cookie will identify your browser, help you log-in and improve the navigation of a website. We use Cookies to help us to improve the performance of our website. Cookies allow us to review the number of visitors to our website and a visitor's usage patterns; to track key performance indicators such as pages visited, frequency of visits, downloads and other statistical information; whether a visitor views the mobile or desktop version of our website; to recognize you if you return to our website; to store information about your past visits, and to remember your preferences.

You may be able to disallow Cookies by modifying the settings in your browser. To learn more about Cookies, and how to disallow or manage them go to: <http://www.allaboutcookies.org/>. If you choose not to accept Cookies, you may be unable to access certain parts or pages of our website. Your non-personally identifiable information may be disclosed to others and permanently archived for future use.

### **Personal information we collect**

During your use of the websites, you may be asked to voluntarily provide certain personal information for purposes such as facilitating communications with you or for applying for access to certain special features or areas of the websites.

We also automatically collect certain usage details, IP addresses, and Browser information. When you visit our website, we collect technical information such as the identity of your Internet Protocol (IP) address, your computer or device's operating system and browser type, geo-location data, and the pages of our website that you visit. Most browsers transmit this type of information to websites automatically. We collect this information to administer and manage our website, to ensure that it functions properly and to review aggregate information.

Except as described above, we do not collect any personal information about you other than personal information which you expressly choose to submit to us directly or through our service providers, such as our telemarketers.

### **How we use the information we collect**

We use the information collected from us and/or our services providers (e.g. our telemarketers) to contact and correspond with you, to respond to your inquiries, to improve our website, to target advertisements or other content on the website to products or services that may be of interest to you, to offer media products you request, or as otherwise permitted by law. We may also use information we collect to analyze user behavior as a measure of interest in, and use of our websites, and may disclose such analyses to advertisers or other third parties in the form of aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

We may disclose personal information about you to third parties: (i) if we have a good-faith belief that we are permitted or required to do so by law or legal process, (ii) to service

providers who require access to such information for the carrying out of their mandate, (iii) to respond to legal claims, (iv) to protect our rights, property or safety or the rights, property or safety of others, or (v) to the resulting organization if we are involved in a merger or other reorganization. Such transfers may include third parties located in other countries (such as Canada, Mexico, or EU countries). Health Scholars, Inc. has not confirmed that all such countries apply the same standards as required under GDPR; therefore, to some risk exists regarding such transfers if the third parties are in countries where the European Commission has not made an adequacy determination nor adopted appropriate safeguards.

### **User-provided information and other parties**

If you post information on our websites, or disclose it to any other party through any of our websites, you should be aware that your information may then be made available to others.

We may share the information you provide us on a confidential basis with partners, contractors, vendors, or service providers that support our operations and our website, but only for those purposes. This may include, for instance, tracking registrations, confirming attendance, and providing biographic information to attendees of our programs.

We may also share your personal information with courts, law enforcement authorities, regulators, attorneys or other parties when it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for purposes of an alternative dispute resolution process; to comply with a subpoena or court order, legal process, or other legal requirement or when we believe in good faith that such disclosure is necessary to comply with the law, prevent imminent physical harm or material financial loss; to investigate, prevent or take action concerning illegal activities, suspected fraud, threats to us or our property; or as necessary in connection with an investigation of fraud, intellectual property infringement, piracy or other unlawful activity.

### **Links to Social Media and Third-Party Websites**

Our website may include links to blogs, social media and third-party websites. These third-party sites have their own privacy policies and terms of use and are not controlled by this Privacy Policy or the terms of our website's disclaimer. You should carefully review any terms, conditions and policies of such third-party sites before visiting them or supplying them with any personal information. If you follow a link to any third-party site, any information you provide that site will be governed by its own terms of use and privacy policy and not this Privacy Policy.

We are not responsible for the privacy or security of any information you provide to a third-party website or the information practices used by any third-party site, including links to any third-party site from our website. We make no representations, express or implied, concerning the accuracy, privacy, safety, security or the information practices of any third-party site. The inclusion of a link to a third-party site on our website does not constitute any type of endorsement of the linked site by us. We are not responsible for any loss or damage you may

sustain resulting from your use of any third-party website or any information you share with a third-party website.

### **Storing and securing your personal information**

Your information may be subject to foreign laws and accessible to foreign governments, tribunals, law enforcement and regulatory agencies. To help protect the confidentiality of your personal information, we employ security safeguards appropriate to the sensitivity of the information (including encryption) and we limit access to your personal information solely to those employees, representatives and agents who require such information for the fulfillment of their functions and/or the carrying out of their mandates. We will keep such information only as long as necessary to fulfill the purposes for which it was provided, and for [fill in a number] of years thereafter. We will not use your personal information for making any automated decisions affecting your legal rights or for creating profiles other than as described in this Policy. No method of data storage or data transmission can be guaranteed to be completely secure. Your use of our website, and any personal information you transmit to Health Scholars, Inc., is at your own risk.

### **Updating, Correcting or Withdrawing Your Personal Information**

It is important that the personal information we have about you is accurate. If any of the personal information you provide us should ever change, for instance if you change your email address or phone number, or should you wish to change your preferences, to stop receiving announcements from us, to correct any inaccurate personal information about you, or to delete any personal information that you provided through your visits to our website, please let us know by sending an email to [support@healthscholars.com](mailto:support@healthscholars.com). We are not responsible for any losses that could arise from any inaccurate, deficient or incomplete personal information that you provide us.

For security reasons, we may need to request specific information from you to help us confirm your identity, before we correct, update or delete any personal information you provide us.

### **Right to access and/or correct personal information**

At any time after we collect your personal information, you will have a right to access and/or to correct it. You may make such a request by sending a written request by email to [support@healthscholars.com](mailto:support@healthscholars.com).

### **Right to withdraw consent**

At any time after we collect your personal information, you will have an opportunity withdraw your consent to its use or disclosure. You may make such a request by sending an email to [support@healthscholars.com](mailto:support@healthscholars.com).

## **E-mail**

If you have any questions regarding this policy or our privacy practices, or the privacy policy and practices of our domestic or foreign service providers, you can contact our Privacy Officer at [support@healthscholars.com](mailto:support@healthscholars.com).

If you contact us by e-mail, you should be aware that e-mail transmissions might not be secure. Information you send by e-mail could be viewed in transit by a third party. We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during transmission.

## **California Visitors**

The California Civil Code permits California Residents with whom we have an established business relationship, to request that we provide you with a list of certain categories of personal information that we have disclosed to third-parties for their direct marketing purposes during the preceding calendar year. To make such a request please send an email [support@healthscholars.com](mailto:support@healthscholars.com). Please mention that you are making a "California Shine the Light" inquiry.

## **Visitors from Outside the United States**

If you are visiting our website from outside the United States ("U.S."), any information you voluntarily provide via our website and any technical information from the browser of your computer, tablet or mobile device will be transferred out of your country and into the U.S. where we are located. The protections available to the privacy of your personal information in the U.S. may significantly differ from the protections available in your country. If you do not want any personal information to be transferred to the U.S., please do not provide that information to our via our website

## **Visitors from the European Union**

On May 25, 2018 the General Data Protection Regulation ("GDPR") goes into effect in the European Union ("EU"). The GDPR extends certain rights to natural persons in the EU involving the privacy of their personal information.

We are the data controller for any personal information provided to us from persons in the EU. We do not have a representative in the EU. As noted earlier, we may transfer your personal data to a third country or international organization as needed (e.g., registration for trade shows in Canada or Mexico).

We will retain any personal information that you provide us for seven (7) years from the date you provided or last updated that information, unless you request that information be deleted at an earlier date. If that information is subject to a litigation hold, or is required to assert or defend a legal claim, then we will hold that information until the claim or action is finally resolved.

The GDPR grants EU residents with the right to request that we update, correct or complete his or her personal information, and to delete or erase any of that personal information from our records. It grants EU residents with the right to object to processing of personal information in certain instances, such as for direct marketing purposes. The GDPR also grants EU residents with the right to restrict the processing of personal information when you believe the information in our possession is inaccurate, that our processing is unlawful, that we no longer need the information for purposes of the processing, or where you have objected to that processing. You may withdraw your consent at any time to our possession or processing of your personal information. EU residents also have a right to request access to their personal information, and to request certain information about its processing. The GDPR also grants EU residents with the right to obtain a copy of any personal information that is processed by automated means which you voluntarily provided to us in a commonly used, structured, machine-readable format, or to have that information transferred to another controller when it is technically feasible. An EU resident can exercise any of these rights by an email to [support@healthscholars.com](mailto:support@healthscholars.com).

You also have the right to lodge a complaint with the competent supervisory authority of an EU member state.

We will review any requests we receive from EU residents and will endeavor to respond in a timely manner. For security reasons, we may request specific information from you to help us confirm your identity before taking action on any request, and to ensure your right of access and the exercise any of GDPR right does not adversely affect the rights of others.

We reserve the right to refuse to act on a request, or to charge a reasonable administrative fee when a request is either manifestly unfounded or excessive because of its repetitive character, and to charge a reasonable administrative fee to requests for further or additional copies

### **Terms of Use**

The End User License Agreement governing your use of the websites contains important provisions disclaiming and excluding our liability and the liability of others regarding your use of the websites and provisions determining the applicable law and exclusive jurisdiction for the resolution of any disputes regarding your use of the websites. Each of those provisions also applies to any disputes that may arise in relation to this policy and the collection, use and disclosure of your personal information, and are of the same force and effect as if they had been reproduced directly in this policy.

### **Changes to this policy**

We reserve the right to change or update this policy, or any other policies or practices, at any time, at our sole discretion, without notice or liability to you or any other person. Any changes or updates will be effective immediately upon posting to any of the websites. The collection, use and disclosure of your personal information by us will be governed by the version of this policy in effect at that time. New versions of this policy will be posted here. Your continued use

of the websites will signify that you consent to the collection, use and disclosure of your personal information in accordance with the changed policy. Accordingly, we recommend that you periodically review this policy to ensure that you are familiar with its most current version.