

# **Privacy Policy**

Effective Date: March 1, 2013

This Privacy Policy provides information on how Capstone Learning Associates, LLC ("Capstone") handles your privacy. It describes the information that we collect about you as a user of our website or our online "e-learning" service (the "Service"), how we handle your personal information, how the information is used, and the choices that you have.

Please read this policy carefully before you provide us with any personal information or use our website.

#### Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our website or the Service, including information by which you may be personally identified, such as name, mailing address, email address, telephone number or company ("personal information"), information that is about you but individually does not identify you, such as IP address, Internet and usage details.

We collect some of this this information directly from you when you provide it to us, such as when you create your account, communicate with us or sign up for a course. We may also collect such information automatically as you use the Service. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.

To use the Service, you must first complete the registration form on our website and agree to our Terms of Use. During registration you will be required to provide personal information such as your name and email address.

#### Information You Provide to Us

The information we collect on our website or through the Service may include the following:

- information you provide by completing forms on our website or reporting problems to us;
- test answers and other information you enter through the Service;
- records and copies of your correspondence (including email addresses), if you contact us;
- information you post on any public forum we may host on our website (a "Forum");
- your responses to surveys that we might ask you to complete for research purposes; and
- your search queries on the website.

We currently accept payment through PayPal. In the event we begin accepting payment through credit cards and other payment cards, we will collect your card account information.

# **Information We May Gather Through Tracking Technologies**

If you visit our website, we may place a text file known as a "cookie" on your computer or other devices. A cookie may contain information that allows us to track your path through our website and to determine whether you have visited us before. We may use cookies to help us understand how visitors use our site and to help us to improve our site and the Service. You may refuse to accept a cookie from us by following the procedures specific to your web browser.

We may use web beacons on our site or other sites and may permit third parties to place them on our site to monitor the effectiveness of advertising or for other legitimate purposes such as analyzing the effectiveness of our web pages and content. A web beacon is a small graphic image on a web page, in a web-based document or in an email message that is designed to allow the site owner or a third party to monitor who is visiting a site. Web beacons are often invisible to the user because they are typically very small and the same color as the background of the web page, document or email message. Web beacons are represented as HTML IMG tags in the web page; a user can click on "view profiles" of the web page to see whether the page is using a web beacon. Web beacons collect the IP address of the computer that the web beacon is sent to, the URL of the page the web beacon comes from and the time it was viewed. Web beacons can also be linked to personal information; for example, advertising networks use web beacons to add information to a personal profile of what sites a person is visiting and to determine what banner ads to display based on the profile. Another use of web beacons is to provide an independent accounting of how many users have visited a particular website. Web beacons are also used to gather statistics about web browser usage at different places on the Internet.

#### **How We Use Your Information**

Non-Personal Information. We use information that is not personal information, in aggregate form, to build higher-quality, more useful services by performing statistical analyses of the collective characteristics and behavior of our users, and by measuring demographics and interests regarding specific topic areas. We may also use it for other business purposes.

Personal Information. Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any personal information we gather from you. In addition to the other uses set forth in this Privacy Policy, we may disclose and otherwise use personal information as described below.

*Updates.* We use personal information collected when you sign up for our various email or update services to send you messages in connection with the Service or an online course. We may also archive this information and/or use it for future communications with you.

Participation in Online Courses. We use the personal information that we collect from you when you participate in an online course through the Service for processing purposes, including but not limited to tracking attendance, progress and completion of an online course. Also, we may archive this information and/or use it for future communications with you.

Forums. To facilitate your use of Forums, we may use personal information collected during your use of Forums. We also reserve the right to reuse Forum posts containing personal information in future iterations of this course or others, for the purpose of enhancing future course offerings. We may archive this information or use it for future communications with you and/or your designee(s). We may also use or publish posts submitted on a Forum in anonymous format, without using personal information.

*Identity Verification.* For services that require identity verification, we use the personal information that we collect for verifying your identity, and for authenticating that submissions made on our website were made by you.

Communications with Capstone. When you send us an email message or otherwise contact us, we may use the information provided by you to respond to your communication or as described in this Privacy Policy. We may also archive this information and/or use it for future communications with you.

Communications with Capstone Business Partners. We may share your personal information with business partners of Capstone to receive communications from such parties that you have opted in to.

Disclosure to Capstone Operations and Maintenance Contractors. Our operations and maintenance contractors may have limited access to your personal information in the course of providing products or services to us. These contractors may include vendors and suppliers that provide us with technology, services, or content related to the operation and maintenance of our website or the Service. Access to your personal information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for us.

Government Authorities, Legal Rights and Actions. Capstone may share your personal information with various government authorities in response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights or to protect our property; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us. We also may share your personal information when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Capstone, our website, our users, customers, or others; and in connection with our Terms of Use and other agreements.

Disclosure to Acquirers. Capstone may disclose and/or transfer your personal information to an acquirer, assignee or other successor entity in connection with a sale, merger, or reorganization of all or substantially all of the equity, business or assets of Capstone to which your personal information relates.

# **Accessing and Correcting Your Information**

You may update your personal information by logging onto our website and visiting your account profile page. You may also contact us at <a href="mailto:support@capstonelearningassociates.com">support@capstonelearningassociates.com</a>. We try to answer every email promptly, but may not always be able to do so. Keep in mind, however, that there will be residual information that will remain within our databases, access logs and other records, which may or may not contain your personal information.

If you have any privacy-related questions or unresolved problems, you may contact us at <a href="mailto:inquiry@capstonelearningassociates.com">inquiry@capstonelearningassociates.com</a>.

# **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. You are responsible for selecting a secure password and keeping it confidential.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website or servers. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our servers.

# **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this Privacy Policy to check for any changes.

# **Protecting Children's Privacy**

We do not knowingly collect or maintain personal information on our website from persons under 13 years of age, and no part of our website is directed to persons under 13 years of age. If you are under 13 years of age, then please do not use or access this website at any time or in any manner. We will take appropriate steps to delete any personal information of persons less than 13 years of age that has been collected on our website without verified parental consent upon learning of the existence of such personal information.

#### **Contact Information**

If you have questions or wish to comment about this Privacy Policy and our privacy practices, please contact us at: <a href="mailto:inquiry@capstonelearningassociates.com">inquiry@capstonelearningassociates.com</a>.