



# Privacy Policy for Go2Learn, LLC

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Effective Date: January 5, 2016

Go2Learn, LLC  
4198 Meadow Hill Road  
Cazenovia, NY 13035

Go2Learn, LLC and our subsidiaries and affiliates ("Go2Learn" or "we") respect your preferences concerning the collection and use of your personal information ("data"). Our goal is to deliver content targeted to the industry you work in, the products you use, the role you play in your organization, and your specific preferences. In order to provide you with relevant information, fulfill your specific requests, and enhance your experience across our Web sites and Conferences, we will at times request data from you. This privacy policy applies to all products and services provided by Go2Learn and describes how we collect data, why we collect it, and what choices you have concerning its use.

## 1. Types of Data Collection

Go2Learn collects data related to you through the following methods:

- Automated means such as communications, protocols, and cookies
- Registration screens and online forms
- Sales inquiries and transactions
- Customer communications
- Offline communications and interactions
- Third party sources of information, such as opt in lists.

Depending upon the method of collection and use, the data collected may include information about you from forms, registrations and transactions (such as name, title, address, company, phone number and e-mail address), financial/transaction information (such as credit card and payment information), information about use of Go2Learn web sites (such as electronic communications protocols, web pages visited and cookies) and user preferences (including product requirements, areas of industry interest, newsletters, community choices and other information managed from the customer profile that is created when registering on any of Go2learn's Web sites.

- a) Electronic Communications Protocols and Cookies:** Go2Learn may receive data from you as part of the communication connection itself, that is, the standard electronic greeting between your computer and our servers. This information often consists of network routing (where you came from), equipment information (browser type), date and time. At this time our server will also query your computer to see if there are "cookies" previously set by Go2Learn to facilitate log in or other site navigation procedures. A "cookie" is a small piece of information sent by a Web server to store on a Web browser so it can later be read back from that browser.
- b) Cookies:** Some parts of the Go2Learn Web sites use cookies to collect information about visitors' use of the Web sites and to facilitate return visits. The information collected from



cookies is tracked to enhance security and/or to improve the functionality of the Web sites by avoiding duplicate data entry, facilitating navigation, and increasing the relevance of content. Cookies on the site may collect the following information: a unique identifier, user preferences and profile information used to personalize the content that is shown, and membership information to access Go2Learn's online communities. Cookies on the site, and the associated data, may be used for the purposes stated in Section 3 below. Some cookies used by Go2Learn's Web sites may remain on the user's computer after they leave the Web sites, but the majority is set to expire within 30 - 365 days. (As discussed in more detail below, you can set your browser to alert you to cookies being placed, in which case a prompt screen will describe information about the cookie, its duration, and the server to which it is being returned.) There may be some cookies on certain tools that are of longer duration. Cookies may also be of benefit to you by creating a more streamlined login process, keeping track of shopping cart additions and preserving order information between sessions. In the future, as we enable further customization of the site, cookies will help in assuring that information provided to you will be the most relevant to your needs.

While we do not offer an opt-out on the site for cookies, browsers provide you with information and control over cookies. You can set your Web browser to alert you when a cookie is being used. You can also get information on the duration of the cookie and what server your data is being returned to. You then have the opportunity to accept or reject the cookie. Additionally, you can set your browser to refuse all cookies or accept only cookies returned to the originating servers. You can generally disable the cookie feature on your browser without affecting your ability to use the site, except in some cases where cookies are used as an essential security feature necessary for transaction completion.

## 2. The Data We Collect and How We Use It

Go2Learn collects data from you for the following purposes:

- a) **To engage in transactions or communications.** Name, address, email, purchase details, and credit card/payment information may be collected and stored as part of the transaction history. The majority of the data collected under this category is business contact information. Go2Learn may need to share some of this data (address, payment) with delivery services, credit card clearing houses and other similarly situated third parties that are required to accomplish the transaction.
- b) **To provide future service and support.** Information collected for this purpose is both contact data and information related to products and service/support requested. This information is also used to provide service, product update, and similar notices.
- c) **To select content.** Data may be collected to help create Web site content and navigation that is most relevant and user friendly. This includes data collected as a result of site navigation as well as data provided in forms.
- d) **To respond to user inquiries and requests for information.** This data includes registrations for newsletters and specific requests for further information.
- e) **To provide various Go2Learn communities, such as partners, with relevant product alerts and updates.** These updates are related to product releases, prices, terms, special offers and associated campaigns. This data is sent out as part of the program member signing up for the relevant program or online account.



- f) **To better tailor marketing to your needs.** We may use information from purchases and requirements to provide you with timely and pertinent notices of product releases and service developments that address your needs and requirements.
- g) **To better respond to requests for service or quotes for product and equipment purchase.** Go2Learn will pass contact information to the appropriate Go2Learn sales person for follow-up related to Go2Learn products or services. Go2Learn may also ask if you wish to have your contact information shared with other selected partners that offer complementary products or services related to your inquiry. If you agree, data is provided to those partners for purpose of responding to your request for service or information. Please review the privacy policy of the specific partner regarding any further interactions with that partner.
- h) **To power joint sales or product promotions.** Go2Learn and its partners may engage in joint events or provide bundled products. Such promotions will always reference the partners involved. Both Go2Learn and the partner(s) will have access to that information. We recommend you review the privacy policies of these partners to address your particular needs and concerns.
- i) From referral/"tell a friend" function. If a user elects to use our referral service for informing a friend about our site, we ask them for the friend's name and email address. Go2Learn will automatically send the friend a one-time email inviting them to visit the site. Go2Learn uses this data for the sole purpose of sending this one-time email and tracking the success of our referral program. The friend may contact Go2Learn at [info@go-2-learn.com](mailto:info@go-2-learn.com) to be removed from the referral program.
- j) **As a result of your registration for attendance at a Go2Learn conference or event.** Those existing customers or registered users who sign up for a conference or event may be contacted prior to the event to see if any meetings, special demonstrations or other customer facilitation may be provided. This contact is in addition to any contact that may be required to confirm payment or provide logistical information and updates related to the conference. Attendees of such events may also be contacted after the event to see if any further information is required or follow up is appropriate. This information will be used only by Go2Learn, designated partners or conference sponsors and will not be released to other third parties. To help assure respect of your data, we maintain control of the data and require that use of the data by these partners is limited to that which is expressly relevant to your profile. Please consult the supplemental privacy statement on the specific conference site for more detailed information.
- k) **As a result of your participation in interactive discussions and public forums.** There are parts of Go2Learn Web sites that permit you to participate in interactive discussions. Some of these are moderated; all are subject to access for technical reasons. Go2Learn does not control the content that users post and some may serve as public discussion forums. As in any interactive forum open to many users, you should carefully consider whether you wish to submit data and should tailor any other content submitted appropriately.

### **3. Customization, Preferences and Opt-Out**

Establishing an online registration profile at any one of Go2Learn Web sites allows you the ability to opt in (or out) of communities and provides you with control over your preferences for electronic information delivery.



- a) **Communications Choices.** Go2Learn recognizes that you may not wish to be contacted about new or related products. All of Go2Learn's Web sites allow you to opt out of some, or all, email marketing that may result from use of the site. These choices are established and modified via your online registration profile. A link to this profile will be available in marketing emails. You can return to the registration profile at any time to change your elections or modify your profile by calling our main office at 917-554-3444 or you can send an email to our general email box at [info@go-2-learn.com](mailto:info@go-2-learn.com). If you have any problems in using any of these opt-out mechanisms, please send an email to [privacy@go-2-learn.com](mailto:privacy@go-2-learn.com) indicate opt-out in the subject line and specify what problem you have encountered in the body of the message.
  
- b) **Information-Sharing Choices.** Go2Learn only shares data with selected companies after providing you the ability to either opt out of or opt into the sharing. There are limitations to opting out in the case of (1) joint sale or joint events where the data goes to both Go2Learn and the other party at the same time; (2) where the customer has requested follow up which involves Go2Learn partners; and (3) where third parties are required to accomplish the transaction, including delivery and credit card clearing services. There may also be some cases where data is shared with third parties as a necessary function of the service, for example, posting comments to a bulletin board or posting an opportunity to an exchange, where data is available to all users. Other examples include attendance at educational or conference events where third parties and Go2Learn partners may be involved in providing services or sponsorship of a conference, seminar, training session, or event. As we further develop our preference tools, we will endeavor to have our partners join in their use to provide the user with a more seamless and streamlined environment.
  
- c) **Third Party Permission-Based Lists.** On occasion, Go2Learn may use a third party permission-based list to send communications about Go2Learn products and services. These are lists maintained by third parties whose users have consented to receive emails from other companies, such as Go2Learn. We do not have access to the names and contact information on these lists; the third party that has the direct relationship with these users maintains the list and the opt-outs, removes, and unsubscribes. We require the list owners to identify themselves as the mailers of the email and to provide appropriate opt-out mechanisms. If you wish to be removed from a third-party list, you should direct your opt-out request to the list owner, not to Go2Learn. Nevertheless, if you have trouble opting out, or if you wish to make us aware of any issues related to a third-party mailing, you may contact us directly at [info@go-2-learn.com](mailto:info@go-2-learn.com). When third-party mailings are sent with a Go2Learn reply address, Go2Learn also will provide a notice with information about how to opt-out of future Go2Learn marketing communications.

Please contact us at [info@go-2-learn.com](mailto:info@go-2-learn.com) if you believe you have mistakenly received information after opting out or if you would like to opt out of receiving information and have been unable to use the opt-out mechanisms provided.

#### 4. Advertising



Go2Learn uses some third parties to administer a limited set of Go2Learn advertisements on its Web sites. No data is provided to the advertisers as part of this process, but aggregate profile information, such as user community, may be used in the selection of advertising to make sure that it has relevance to the user. On some banner ads, an embedded pixel may be present, and while it does not associate with a cookie or other personal profile information, it may return session connection information that allows advertisers to better determine how many individual users have clicked on the ad banner.

## **5. Legal**

Go2Learn may disclose your information in special cases. For example, your information may be disclosed when Go2Learn believes that disclosure is necessary to identify, contact or bring legal action against someone, or if Go2Learn believes in good faith that the law requires disclosure.

## **6. Security**

Go2Learn is concerned with the security of the data we have collected and has in place reasonable measures to prevent unauthorized access to that information. These measures include policies, procedures, and technical elements relating to data access controls. In addition, Go2Learn uses standard security protocols and mechanisms to exchange the transmission of sensitive data such as credit card details.

In the event that individual personal data is acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, Go2Learn will notify the affected individual of the breach by email or fax or, if Go2Learn is unable to contact the individual by email or fax, then by U.S. mail. Notice will be given promptly, consistent with the legitimate needs of law enforcement and any measures necessary for Go2Learn or law enforcement to determine the scope of the breach and to assure or restore the integrity of the data system. Go2Learn may delay notification if Go2Learn or a law enforcement agency determines that the notification will impede a criminal investigation, unless and until Go2Learn or the agency determines that notification will not compromise the investigation.

## **7. Compliance Issues**

This privacy policy is intended to comply with all applicable law, including without limitation, the California Online Privacy Protection Act and the Children's Online Privacy Protection Act.

Any information you give us about yourself is held with the utmost care and security and will not be used in ways to which you have not consented. Should you believe your data has been used in a way that is not consistent with this policy or your stated preferences, or should you have further questions related to this policy, please contact us by email at [info@go-2-learn.com](mailto:info@go-2-learn.com). Written inquiries may be addressed to Go2Learn, 4198 Meadow Hill Road, Cazenovia, NY 13035.

## **8. Policy Updates**

This privacy policy may change from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice on this page. In



some cases we may also email users who have opted to receive communications from us, notifying them of the changes in our privacy practices. We may update this policy from time to time to describe how new site features affect our use of your data and to let you know of new control and preference features that we provide you.

The date the privacy policy was last revised is identified at the top of this page.

We appreciate your comments on Go2Learn privacy practices: [info@go-2-learn.com](mailto:info@go-2-learn.com)

