

Centric Learning Solutions, LLC Privacy Notice

Our Privacy Notice reflects our commitment to the following Privacy Principles:

1. We're deeply committed to creating a safe and secure online environment for you.
2. We do not sell your personal information to third parties.
3. We strive to provide you with access to and control over the information you give us, and we take the protection of your information very seriously.
4. We do not advertise on Centric Learning Solutions, LLC (CLS). We use your information to provide you with a better learning experience, not to sell you products.

About CLS and our Privacy Notice

CLS feels strongly about protecting your privacy. We understand how important privacy is to you, and we are committed to creating a safe and secure environment for learners on our web site, application programming interface (our "API"), and online services (collectively, our "Website"). We use the data we collect to provide you with a better experience. Our Privacy Notice describes what information we gather from our members and others who visit and use the Website, how we use that information, and what we do to protect it. By visiting or using our Website, you expressly consent to the information handling practices described in this Privacy Notice. Your use of the Website and any information you provide on the Website are subject to the terms of this Privacy Notice, which is incorporated into and subject to our Terms of Service. The Terms of Service is available on our website.

How we collect and use data

We take the information you provide to us very seriously, and we strive to put you in control of decisions around your information.

CLS collects the following information about you and your use of our Website:

1. **Personal Information.** When you register for, browse and use the Website, you may provide to CLS what is generally called "personally identifiable information" or "personal data" (such as your full name, email address, or a photograph of yourself) that can be used to identify you. At CLS, we call this data "Personal Information."

2. **Information about your use of the Website and other User-provided Information.** We may collect information about your use of certain Website features, such the number of goals you have obtained, the number of programs you have viewed, and the amount of time spent to complete an action step. This enables us to better tailor educational experiences that are most appropriate for you.
3. **Information obtained from other Users.** We may make available certain features on the Website that allow other Users to provide us information. This information may include Personal Information. For example, a dental consultant may register an account for their client and provide us with certain information, such as the client's username.
4. **Technical Information.** A) To provide a personalized learning and high-quality experience for our Users, we may use various technologies that automatically record certain technical information from your browser or device, including standard log files, web beacons, or pixel tags. This technical information may include your Internet Protocol (IP) address, browser type, internet service provider (ISP), referring or exit pages, click stream data, operating system, and the dates and times that you visit the Website and assists us in understanding how our Users are using our Website. B) Like most websites, whether or not you are a registered member, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. Cookies remember information about your activities on a website and enable us to provide you with a more personalized learning experience. CLS may use both session cookies and persistent cookies. A session cookie disappears automatically after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Website. You can, however, remove a persistent cookie at any time. Please review your web browser "Help" file to learn the proper way to modify your cookie settings. However, without cookies you may

not have access to certain services and features on the Website. C) CLS may use a variety of third-party service providers, such as YouTube to host our videos or Google Analytics to understand our Website usage. We may allow third-party service providers to place and read their own cookies, web beacons, and similar technologies to collect information through the Website. This information is collected directly and automatically by these third parties, and CLS does not participate in these data transmissions. CLS will, wherever feasible, contractually obligate our third-party service providers to abide by the terms of this Privacy Notice.

5. Location Information. We may collect and store information about your location to provide you with tailored educational experiences for your region or state. You may be able to change the settings on your computer or mobile device to prevent it from providing us with such information.
6. Information from Other Sources. A) In certain situations, we may obtain information, including Personal Information, from third parties or sources other than the Website. If we combine or associate information from other sources with Personal Information that we collect through the Website, we will treat the combined information as Personal Information in accordance with this Privacy Notice. B) CLS uses this information in the following ways: To enhance our Website and the services we provide. CLS uses the information you provide or that we collect to enhance our relationship with you and to operate, maintain, enhance, and provide all of the features and services found on the Website. CLS may, for instance, remember your recent activity so we can recommend the most appropriate content for you on your next visit. If you have given CLS consent, we may use your Personal Information to provide you with information about CLS's features, services and other offerings that may be of interest to you. Under certain circumstances, if we obtain your consent (for example, if you submit a testimonial and agree to make it public), we may post your Personal Information on the Website.

7. To understand how you and other Users use our Website. CLS uses all of the information that you provide or that we collect from Users to understand and analyze the usage trends, learning behaviors, and preferences of our Users, to improve the way the Website works and looks, and to create new features and functionality.
8. To enable your participation in CLS partnership arrangements. CLS will not share Personal Information with other third-party organizations for their marketing or promotional use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in. You may ask or authorize us to share your Personal Information with authorized partners, not-for-profit organizations, and other entities that are not affiliated with CLS. In these cases, we will provide to these third parties only the information you have authorized or asked us to share. CLS may send information or offers to you on behalf of these third parties. For example, we may partner with an association and send you an email notifying you of the partnership; if you opt-in to the program and indicate your approval, we may share your information with the third party to facilitate your participation in the program.
9. Limitations on Access to your Personal Information by Employees and Authorized Parties. CLS's employees, agents and contractors must have a legitimate business reason to access Personal Information you provide to CLS. We may share your Personal Information with third-party service providers, including outside contractors or agents who help us manage our information activities, but they may only use your Personal Information to provide us with a specific service and not for any other purpose. Where feasible, CLS will require our third-party service providers to comply with this Privacy Notice.

How we share or transfer data

CLS takes great care to protect the information you provide us. We do not rent or sell Personal Information that we collect from Users with third parties.

1. CLS will disclose User information only as described below: a) if you want information shared with other Users, we'll share it for

you. We provide certain features that may allow you to share information with other Users. For example, you may choose to populate your profile with your name, short biography, and location. Or you may ask questions that are visible to other Users of CLS. Whenever you share information with other Users of the Website, any Personal Information that you choose to include in, or is associated with, such User Postings will be accessible by such Users. As with most online services, once you make your Personal Information available to others in any of these ways, it may be collected and used by the recipients without restriction. b) We may share data with third-party applications that you authorize. Third-party application developers and service providers (commonly known as “App Developers”) may build complementary services for our platform, such as a mobile application for visually-impaired learners to access our resources. You may request we share your information with App Developers by connecting to the application or service and approving access to your CLS account. CLS has taken steps to try to ensure the safety of information accessed by App Developers and requires App Developers to comply with our Terms of Service and this Privacy Notice.

2. We may share anonymous or aggregate data to improve our services and learn more about our Users. In certain occasions, CLS may work with business partners to improve our services or offerings. We may disclose automatically collected and other aggregate non-Personal Information to authorized business partners to conduct research on online education or assist in understanding the usage, viewing, and demographic patterns for certain programs, content, services, promotions, and/or functionality on the Website.
3. We will share data when required by law. CLS may also disclose User information if required to do so by law, or if we have a good-faith belief that such action is necessary to comply with local, state, federal, international, or other applicable laws (such as U.S. Copyright law) or respond to a court order, judicial or other government subpoena, or warrant, or administrative request. In some

cases, we may make such disclosures without first providing notice to Users.

4. We may share data in the context of a change of business, including a merger or acquisition. In the event that CLS is acquired by or merged with a third-party entity, we may transfer or assign the information that we have collected from Users as part of such merger, acquisition, sale, or other change of control.
5. We may share data when necessary or appropriate to protect CLS or others. CLS may disclose information that we believe, in good faith, is appropriate or necessary to take precautions against liability; to protect CLS from fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against any third-party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of the Website; or to protect the rights, property, or personal safety of CLS, our Users, or others.

Your choice and options in our data collection, use, and transfer

1. You can choose to not provide us with Personal Information. You may always decline to share your Personal Information with CLS. If you do so, however, CLS will not be able to provide to you certain features and functionalities found on our Website. You may later enable or access those features by providing CLS with the necessary Personal Information.
2. You can edit or delete Personal Information in our records. We want you to have access to your information, so that you can help keep it as accurate as possible. If you register and provide CLS with Personal Information, you may update, correct, or delete it at any time by reviewing your profile information and preferences on your account settings page. If you experience any difficulties in this process, please contact us as described below.

Our approach to data security

1. Website security is important to you, and to us. To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your information. We may ask you to provide certain Personal

Information to confirm your identity, and may require that you create and use a password to access certain parts of the Website. You should create and maintain a strong password to help ensure the security of your account. We try to ensure that our Website and information sent to us are safe, but no security measures are perfect

2. CLS uses certain physical, managerial, and technical safeguards designed to preserve the integrity and security of your Personal Information and other information we maintain in connection with the Website. We cannot, however, ensure or warrant the security of any or all of the information you transmit to CLS, and you do so at your own risk. Once we receive your transmission of information, CLS makes commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.
3. We will notify you electronically or via the Website if CLS experiences a data security incident that could affect you. If we learn of a data security incident that compromises or appears to compromise your Personal Information, then we will attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on the Website if a data security incident occurs.

How we maintain data integrity

At CLS, we only use Personal Information as needed for the purposes for which it was collected or where you have consented to our use of Personal Information relating to you. We take reasonable steps to ensure that the Personal Information we store and use is accurate, complete, and up-to-date. If you discover that Personal Information or other data pertaining to you is inaccurate, incomplete, or out-of-date, please update

your account information or contact us as outlined below.

Links to other sites

The Website may be linked to websites operated by other entities or individuals. Some of these websites, such as our Facebook page, may be co-branded with our name or logo. This Privacy Notice does not apply to, and we cannot always control the activities of, such other third-party websites. You should consult the respective privacy policies of these third-party websites.

International visitors

Our Website is operated and managed on servers located within the United States. If you choose to use our Website from the European Union or other regions of the world with laws governing data collection and use that differ from U.S. law, then you acknowledge and agree that you are transferring your Personal Information outside of those regions to the United States and that, by providing your Personal Information on the Website, you consent to that transfer.

Changes and updates to this Privacy Notice

CLS may modify or revise this Privacy Notice from time to time. CLS will notify Users of any change to our Privacy Notice by posting the revised Privacy Notice with an updated date of revision on our Website, along with a short notice of the revision posted on the Website homepage. We will not change how we use any Personal Information in any material way without also providing notice of the change via email, through this website, or through other means, and obtaining consent to any new uses.

Contacting CLS

Please contact CLS with any questions or comments about this Privacy Notice, your personal information, our third-party disclosure practices, or your consent choices by email at info@centriclearning.pro.

October, 2014