

PRIVACY POLICY

Last Updated on January 30, 2022

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE PLATFORM OR ENGAGE IN COMMUNICATIONS WITH US.

INTRODUCTION

Parthenon Management Group, LLC (“Parthenon” also referred to as “we,” “us,” and “our”) is committed to protecting the privacy and security of the personal information we collect, use, share, and otherwise process as part of our business. We also believe in transparency, and we are committed to informing you about how we treat your personal information. We have established this Privacy Policy (the “Policy”) to inform you about the privacy practices that we apply to personal information and inform you about your rights and choices in this regard.

What processing activities are covered by this Policy? This Policy applies to the processing of personal information when you visit our website <https://parthenonmgmt.com/> (the “Site”) and any features, subdomains, content, functionality, services, media, applications, or solutions offered on or through the Site (collectively referred to as the “**Platform**”). By accessing and using the Platform, or by otherwise signaling your agreement when the option is presented to you, you consent to the collection, use and disclosure of information described in this Policy. This Policy only governs the Platform, and it does not govern off-line data collection, or any other website or service operated by third parties that do not specifically refer to this Policy. Any materials submitted through the Platform and your use of the Platform are subject to the Terms of Service ([TERMS OF USE](#))

Who is responsible for your personal information? If you are a user in the European Union (“EU”) or European Economic Area (“EEA”), for purposes of the EU General Data Protection Regulation 2016/79 (the “GDPR”), we act as a data controller with respect to the information described in this Policy. In this role, we are responsible for implementing the applicable data protection principles and for safeguarding personal information. We also recommend you consult the “*Rights of EEA Residents*” and “*International Data Transfers*” sections of this Policy for more information about provisions that may apply to you.

HOW DO WE COLLECT AND PROCESS YOUR INFORMATION?

We collect and process the following personal information from you for the purposes set forth below.

Category	Types of Data and Purpose
Account Information	<p>In order to access and use certain features of the Platform, an end user of the Platform must first complete a registration. When you create an account and register with us, we collect your name, email address, and the username and password that you create for your account.</p> <p>We process Account Information to provide our Platform, to provide our services to you, to honor our terms of use and contracts, to ensure the privacy and security of our Platform and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where</p>

	<p>applicable, our legitimate interests in the proper administration of our Platform and business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
Account Information	<p>Our Platform offers services and platforms to create, design, publish, and sell the services offered by us. In order to access and use certain features of the Platform, a you must complete a registration. In addition to Account Information, we may also collect information that you provide relative to a general description or biography of your association or affiliate entity.</p> <p>We process your Account Information to provide our Platform and services, to honor our terms of use and contracts, to ensure the privacy and security of our Platform and services, to maintain our databases and back-ups, to manage our relationships with you, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Platform and business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
User Content	<p>When you choose to upload content to the Platform related to your association or affiliated entity, we will collect information associated with the content which may contain personal information.</p> <p>We process such Content to provide our Platform and services, to honor our terms of use and contracts, to ensure the privacy and security of our Platform and services, to manage our relationships with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Platform and business, the proper management of our customer relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
Payment Information	<p>In addition to your Account Information, our third-party payment processor will collect your billing address, your credit card information (credit card number, name on card, security code, expiration date, and CVV); email address; and billing zip code. By submitting your Payment Information, our Payment Processor may share invoices or such other transactional documents that may contain your financial information. We do not store your Payment Information.</p> <p>We process Payment Information to bill and fulfill purchases, to process payments, to honor our terms of use and contracts, and to manage the data associated with those purposes. The legal basis for this processing is consent or, where applicable, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
Social Network Information	<p>You may connect with us through a third-party social network, such as Facebook, Twitter, LinkedIn and other networks (each, a “Social Network”). If you choose to do so, we may collect information from your profile on such Social Network, such as your name, username, and email address. In addition, our Platform offers features that will allow you to share information from our Platform to a Social Network or share information from our Social Network sites. If you decide to use such features, they may allow the sharing and collection of information both to and from such</p>

	<p>Social Network so you should check the privacy policy of each Social Network before using such features.</p> <p>We process Social Network Information to provide our Platform and services, to manage our relationships with you, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Platform and business and the proper management of our customer relationships.</p>
<p>Cookies and Similar Technologies</p>	<p>When you visit the Platform, we collect cookies and use similar technologies as described in the “<i>Cookies and Similar Technologies</i>” Policy, which supplements this Policy. If you choose to disable cookies and similar technologies, some areas and features of the Platform may not work properly. Please see the “<i>Cookies and Similar Technologies</i>” section of this Policy for more information.</p> <p>We process Cookies and Similar Technologies to analyze use of the Platform and our services, to operate the Platform, to serve you the content and functionality you request, to ensure the privacy and security of our Platform and services, to develop new services, to enhance your experience, to track visits to the Platform, to provide you with a more personal and interactive experience on the Platform, and for usage analytics. We rely on your express opt-in consent for the use of marketing, performance, and analytic cookies and similar technologies. The legal basis for processing of strictly necessary cookies is our legitimate interests in the proper administration of our Platform and business.</p>
<p>Usage Data</p>	<p>When you visit our Platform, we automatically collect information from your browser or device, which includes the date and time of your visit as well as your location, Internet Protocol (IP) address, unique device identifier, language preference, device type, browser type, domain server, access time, referring website, mobile network information, data about which pages you visit, support document searches, features enabled for your account, and interactions with other parts of our Platform.</p> <p>We process Usage Data to analyze use of the Platform and our services, to operate the Platform, to serve you the content and functionality you request, to ensure the privacy and security of our Platform and services, to develop new services, to enhance your experience, to track visits to the Platform, and to provide you with a more personal and interactive experience on the Platform, and for usage analytics. The legal basis for this processing is our legitimate interests in monitoring and improving our Platform and services.</p>
<p>Location Information</p>	<p>When you visit our Platform, we may determine your approximate location from your Internet Protocol (IP) address.</p> <p>We process Location Information to analyze use of the Platform and our services, to operate the Platform, to track visits to the Platform, to provide you with a more personal and interactive experience on the Platform, and for usage analytics. The legal basis for this processing is our legitimate interests in monitoring and improving our Platform and services.</p>
<p>Feedback or Support Inquires</p>	<p>If you provide us with feedback or respond to surveys, we will collect your name, email address, phone number, and any written correspondence or comments provided by you.</p>

	We process Feedback or Support Inquiries to operate the Platform and services, to manage our relationships with you, to improve our customer service, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Platform and business, the proper management of our relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
Contact Us Data	<p>If you contact us, we collect your email address and the content of your correspondence to us.</p> <p>We process Contact Us Data to operate the Platform and services, to ensure the privacy and security of our Platform and services, to maintain our databases and back-ups, to manage our relationships with you, to improve our customer service, to communicate with you, and to keep records of our communications with you. The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Platform and business, the proper management of our relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>

Is entry of personal information required? The entry of personal information is required to access certain portions of the Platform and to request further information from us via the Platform. You may choose not to provide us with any personal information and may still access certain portions of the Platform but will not be able to access any portions of the Platform that require your personal information.

Other Processing Activities. We may process any of the personal information identified in this Policy when necessary for:

- Registration for programs and services you have requested;
- Process, fulfill, and follow up on your orders or membership application;
- Provide access to journal content;
- Answer your emails or online requests;
- Send information you request;
- Send and process surveys;
- Ensure the Platform is relevant for your needs;
- Deliver Parthenon services such as newsletters, meetings, or events;
- Recommend content that suits you;
- Alert you when fresh content is posted or released;
- Notify you about new products/services, special offers, upgrades, and other related information from Parthenon and approved third parties;
- The establishment, exercise, or defense of legal claims, whether in court, administrative, or other proceedings. (The legal basis for such processing is our legitimate interest in the protection and assertion of our legal rights, your legal rights, and the legal rights of others.);
- Obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice (The legal basis for this processing is our legitimate interest in the proper protection of our business.); and
- Purposes that are consistent with, related to and/or ancillary to the purposes and uses described in this Policy for which your personal information was provided to us.

We may process your personal information in connection with any of the purposes and uses set out in this Policy on one or more of the following legal grounds:

- Because it is necessary to perform the services you have requested or to comply with your instructions or other contractual obligations between you and us;
- To comply with our legal obligations as well as to keep records of our compliance processes;
- Because our legitimate interests, or those of a third-party recipient of your personal information, make the processing necessary, provided those interests are not overridden by your interests or fundamental rights and freedoms;
- Because you have chosen to publish or display your personal information on a public area of the Platform, such as a comment area;
- Because it is necessary to protect your vital interests;
- Because it is necessary in the public interest; or
- Because you have expressly given us your consent to process your personal information in a particular manner.

We do not use personal information for making any automated decisions affecting or creating profiles other than as described herein. We will ask for your consent before using information for a purpose other than those set out in this Policy.

How and When Is Your Information Shared With Other Parties? We may share your information in the following contexts, but we will not share your Personal Information if such sharing is prohibited by applicable privacy and data protection law. We do not sell, trade or license Personal Information about our users for marketing purposes.

HOW DO WE SHARE OR DISCLOSE YOUR PERSONAL INFORMATION?

Where permitted by applicable law, we may share your personal information in the following contexts. If we are acting as a data processor, disclosures in the following contexts will be limited in accordance with the instructions from the data controller.

Category	Context
Corporate Affiliates	We may share your personal information with our corporate subsidiaries and affiliates and with their respective officers, directors, employees, accountants, attorneys and agents.
Service Providers	We may share your personal information with our service providers that need access to your information to provide operational or other support services on our behalf. Among other things, service providers help us to administer the Platform; support our provision of services requested by you; send marketing promotions and communications to you about our services; provide payment processing; provide technical support; and assist with other legitimate purposes permitted by law.
Legal Obligations and Rights	We may disclose your personal information in response to subpoenas, warrants, court orders or other legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our legal rights, to defend against a legal claim, and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our Terms of Service or other contracts. We may also disclose personal information as needed to protect vital interests.
Acquisitions and Similar Transactions	We may share your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

Disclosures with Consent	We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this Policy. We will only disclose your information in this context with your consent.
De-identified or Aggregated Data	We may disclose aggregated information about our users, and information that does not identify any specific individual, such as groupings of demographic data or customer preferences, for new services and marketing development.
Professional Advisors	We may share your personal information with our insurers and other professional advisors, including attorneys and accountants, that need access to your information to provide operational or other support services on our behalf.

HOW LONG DO WE STORE AND PROCESS YOUR INFORMATION?

We retain and use your personal information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to pursue legitimate business purposes, to enforce our agreements.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, and (3) if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives.

To the extent permitted by law, we may retain and use anonymous, de-identified, aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement. When we delete data, it will be removed from our active servers and databases; but it may remain in our archives when it is not practical or possible to delete it.

We are required by law to maintain records of consumer requests submitted under the California Consumer Privacy Act and how we responded to such requests for at least twenty-four (24) months. We only use this information for recordkeeping purposes. If you are a resident of California, please see the California Privacy Rights section for more information.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have put security measures in place to protect the personal information that you share with us from being accidentally lost, used, altered, or disclosed or accessed in any unauthorized manner. From time to time, we review our security procedures to consider appropriate new technologies and methods.

While our security measures seek to protect the personal information in our possession, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information you transmit to or from the Platform. Your use of the Platform is at your own risk. We cannot guarantee that your data will remain secure in all circumstances.

We use reasonable security measures when transmitting personal information to consumers in responding to requests under the California Consumer Privacy Act. We have implemented reasonable security measures to detect fraudulent identity-verification activity and to prevent the unauthorized access to or deletion of personal information.

The safety and security of your personal information also depends upon you. Where you use a password for access to restricted parts of the Platform, you are responsible for keeping your password confidential. Do not share your password with anyone.

If a data breach compromises your personal information, we will notify you and any applicable regulator when we are required to do so by applicable law.

RIGHTS AND CHOICES REGARDING HOW WE USE AND DISCLOSE YOUR INFORMATION

Please use the “Contact Us” details at the end of this Policy to exercise your rights and choices under this Policy. If you would like to manage, change, limit, or delete your personal information nor if you no longer want to receive any text message or email contact from us in the future, such requests may be submitted via the “Contact Us” details at the end of this Policy.

Communication Preferences. If you no longer wish to receive communications from us via email, you may opt-out of certain types of communications (as described below) by clicking the “unsubscribe” link at the bottom of our emails or by contacting us at the “Contact Us” details provided at the end of this Policy and providing your name and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take action.

- **Communications Regarding Our Services.** We will send you email notifications and free newsletters from time to time with offers, suggestions and other information. You may “opt-out” from receiving such communications by following the “Unsubscribe” instructions provided in the email.
- **Legal or Security Communications.** We also send out notices that are required for legal or security purposes. For example, certain notifications are sent for your own protection. In other cases, these notifications involve changes to various legal agreements, such as this Policy or the Terms of Service. Generally, you may not opt out of such emails.
- **Account and Order Communications.** If you subscribe to our services, we may send you communications regarding such services. We may also send communications providing customer support or responses to questions regarding the operation of the services. Generally, you may not opt out of such emails.

Cookies. You may choose to not allow analytic cookies via the cookies consent banner or you may set your browser to refuse all or some browser cookies or to alert you when cookies are being set. For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/>. You may learn more about internet advertising practices and related consumer resources at <http://www.aboutads.info/consumers/>, <http://www.networkadvertising.org/choices>, and <http://youronlinechoices.eu/>.

Online Tracking Signals. We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions. “Do Not Track” is a web browser setting that seeks to disable the tracking of individual users’ browsing activities. We adhere to the standards set out in this Policy and do not currently respond to “Do Not Track” signals on the Platform or on third-party websites or online services where we may collect information.

Accuracy and Updating Your Personal Information. Our goal is to keep your personal information accurate, current, and complete. If any of the personal information you have provided to us changes, please update it in your user/account profile, or let us know via the “Contact Us” details at the end of this Policy. For instance, if your email address changes, you may wish to let us know so that we can communicate with you. If you become aware of inaccurate personal information about you, you may want to update your

information. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Complaints. If you believe that your rights relating to your personal information have been violated, you may lodge a complaint with us by contacting us via the “Contact Us” details at the end of this Policy.

California Residents

CCPA Notice at Collection. For purposes of the California Consumer Privacy Act (“CCPA”), in collecting the information described above, we collect the categories of personal information listed below. If your information is collected in the context of a business relationship with us, it may not be covered by the CCPA.

CCPA Category	Description
Identifiers	<p>When collecting <i>Account Information</i>, we will receive your name, email address, username, and unique personal identifier.</p> <p>When collecting <i>Payment Information, Social Media Information, Feedback or Support Inquiries, and Contact Us Data</i>, we will receive your name and email address.</p> <p>When collecting <i>Social Media Information</i>, we will receive your name and email address.</p> <p>When collecting <i>Cookies and Similar Technologies and Usage Information</i>, we will receive your Internet Protocol (IP) address or unique device identifier.</p> <p>We use Identifiers as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>
Categories of personal information described in the California Customer Records statute	<p>When collecting <i>Account Information</i>, we will receive your name, email address, and username, and unique personal identifier.</p> <p>When collecting <i>Payment Information, Social Media Information, Feedback or Support Inquiries, and Contact Us Data</i>, we will receive your name and email address.</p> <p>When collecting <i>Social Media Information</i>, we will receive your name and email address.</p> <p>When collecting <i>Cookies and Similar Technologies and Usage Information</i>, we will receive your Internet Protocol (IP) address or unique device identifier.</p> <p>We use Categories of Personal Information described in the California Customer Records statute as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>

Internet or other electronic network activity information	<p>We collect <i>Cookies and Similar Technologies</i> as described in our “Cookies and Similar Technologies” Policy.</p> <p>When collecting <i>Usage Information</i>, we will automatically receive information from your browser and your device, which includes the date and time of your visit as well as your location, Internet Protocol (IP) address, domain server, browser type, access time, and data about which pages you visit.</p> <p>We use Internet or Other Electronic Network Activity Information as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>
Geolocation data	<p>When collecting <i>Cookies and Similar Technologies, Location Information</i> and <i>Usage Information</i> we will receive your location while using the Platform.</p> <p>We use Geolocation Data as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>
Audio, electronic, visual, thermal, olfactory, or similar information	<p>When collecting <i>Contact Us Data</i>, we will receive your preferred method of contact and the message that you choose to provide.</p> <p>We use Audio, electronic, Visual, Thermal, Olfactory, or Similar Information as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>
Commercial Information	<p>TBD</p> <p>We use Commercial Information as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>
Professional or employment-related information	<p>When collecting <i>Account Information</i> and <i>Contact Us Data</i>, we will receive your work email address, work telephone number, company name, and company address.</p> <p>We use Professional or Employment-Related Information as set forth in the “<i>How Do We Collect and Use Personal Information</i>” and the “<i>How Do We Share or Disclose Personal Information</i>” sections of this Policy.</p>
Inferences	<p>Examples: Derivation of information, data, assumptions, or conclusions from facts, evidence, or another source of information or data) drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>

Data Practices During Last 12 Months

Personal Information Collected: As described in this Policy, we have collected the categories of personal information listed below during the preceding 12 months:

- Identifiers
- Categories of personal information described in the California Customer Records statute
- Internet or other electronic network activity information

- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Commercial Information
- Professional or employment-related information

Categories of Sources: We have collected the personal information identified in this Policy from you including but not limited to name, email, address, phone number and demographic data.

Business and Commercial Purposes for Collecting: We have collected the categories of personal information listed above for the following purposes:

- Operate the Platform;
- Provide our services to you;
- Honor our terms of use and contracts;
- Ensure the privacy and security of our Platform and services;
- Maintain our databases and back-ups;
- Manage our relationships with you;
- Communicate with you;
- Keep records of our communications with you;
- Analyze use of the Platform and our services;
- Serve you the content and functionality you request;
- Develop new services;
- Enhance your experience;
- Track visits to the Platform;
- Provide you with a more personal and interactive experience on the Platform; and
- Usage analytics purposes.

Personal Information Sold: We have not sold categories of personal information during the preceding 12 months.

Personal Information Disclosed for a Business Purpose. We have disclosed for a business purpose the categories of personal information listed below during the preceding 12 months:

- Identifiers
- Categories of personal information described in the California Customer Records statute
- Characteristics of protected classifications
- Commercial information
- Internet or other electronic network activity information
- Commercial Information
- Geolocation data

We have disclosed each category of personal information to the following categories of third parties: (1) corporate parents, subsidiaries, and affiliates; (2) advisors (accountants, attorneys); (3) service providers (data analytics, data storage, mailing, marketing, website and platform administration, technical support); and (4) operating systems and platforms.

No Financial Incentive

We do not offer financial incentives or any price or service difference in exchange for the retention or sale of your personal information.

Do Not Sell My Personal Information

Under the CCPA, you have the right to direct us to stop selling your personal information to third parties and to refrain from doing so in the future. For purposes of the CCPA, we do not sell personal information as defined under applicable law.

CCPA Requests to Know and Requests to Delete

The CCPA gives consumers the right to request that we (1) disclose what personal information we collect, use, disclose, and sell, and (2) delete certain personal information that we have collected or maintain. You may submit these requests to us as described below, and we honor these rights where they apply.

However, by way of example, these rights do not apply where we collect or sell a consumer's personal information if: (1) we collected that information while the consumer was outside of California, (2) no part of a sale of the consumer's personal information occurred in California, and (3) no personal information collected while the consumer was in California is sold. In addition, de-identified information is not subject to these rights.

If a request is submitted in a manner that is not one of the designated methods for submission, or if the request is deficient in some manner unrelated to our verification process, we will either (1) treat the request as if it had been submitted in accordance with the designated manner, or (2) provide you with specific directions on how to submit the request or remedy any deficiencies with the request, as applicable.

Request to Know. As a California resident, you have the right to request: (1) the specific pieces of personal information we have collected about you; (2) the categories of personal information we have collected about you; (3) the categories of sources from which the personal information is collected; (4) the categories of personal information about you that we have sold and the categories of third parties to whom the personal information was sold; (5) the categories of personal information about you that we disclosed for a business purpose and the categories of third parties to whom the personal information was disclosed for a business purpose; (6) the business or commercial purpose for collecting, disclosing, or selling personal information; and (7) the categories of third parties with whom we share personal information. Our response will cover the 12-month period preceding our receipt of a verifiable request.

Request to Delete. As a California resident, you have a right to request the erasure/deletion of certain personal information collected or maintained by us. As described herein, we will delete your personal information from our records and direct any service providers (as defined under applicable law) to delete your personal information from their records. However, we are not required to honor a deletion request if an exemption applies under the law.

Submitting a Request

Submission Instructions. You may submit a request to know or to delete via your Account Page or a toll-free telephone call to 615-432-0100 or by email to headquarters@aro.org. Regarding requests to delete, we may present you with the choice to delete select portions of your personal information, but a global option to delete all personal information will be offered and more prominently presented.

Verification Process. We are required by law to verify the identities of those who submit requests to know or to delete. To determine whether the individual making the request is the consumer about whom we have collected information, we will verify your identity by matching the identifying information provided by you in the request to the personal information that we already maintain about you. As a part of this process, you will be required to provide your name, email address, address, and telephone number. We will inform you if we cannot verify your identity.

- If we cannot verify the identity of the person making a request for categories of personal information, we may deny the request. If the request is denied in whole or in part for this reason, we will provide a copy of, or direct you to, this Policy.
- If we cannot verify the identity of the person making the request for specific pieces of personal information, we are prohibited from disclosing any specific pieces of personal information to the requestor. However, if denied in whole or in part for this reason, we will evaluate the request as if it is seeking the disclosure of categories of personal information about the consumer.
- If we cannot verify the identity of the person making a request to delete, we may deny the request.
- If there is no reasonable method by which we can verify the identity of the requestor to the degree of certainty required, we will state this in our response and explain why we have no reasonable method by which we can verify the identity of the requestor.

Authorized Agents. Authorized agents may submit requests via the methods identified in this Policy. If you use an authorized agent to submit a request to know or a request to delete, we may require you to: (1) provide the authorized agent with signed permission to do so; (2) verify your identity directly with us; and (3) directly confirm with us that you provided the authorized agent permission to submit the request. However, we will not require these actions if you have provided the authorized agent with power of attorney pursuant to the California Probate Code.

Excessive Requests. If requests from a consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either (1) charge a reasonable fee, or (2) refuse to act on the request and notify the consumer of the reason for refusing the request. If we charge a fee, the amount will be based upon the administrative costs of providing the information or communication or taking the action requested.

CCPA Non-Discrimination

You have the right not to receive discriminatory treatment by us due to your exercise of the rights provided by the CCPA. We do not offer financial incentives and price or service differences, and we do not discriminate against consumers for exercising their rights under the CCPA.

California Shine the Light

Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. At present, we do not share your personal information with third parties for those third parties' direct marketing purposes. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing, if any, will be included in our response. As part of the California Online Privacy Protection Act, all users of our Platform may make any changes to their information at any time by contacting us by email to headquarters@aro.org

Nevada Residents

You may submit a verified request to us by email to headquarters@aro.org to request that we not make any sale (as defined under Nevada law) of any covered information (as defined under Nevada law) that we have collected or will collect about you. Please provide your name and contact information in your request, and we will respond to your request in accordance with Nevada law.

Colorado, Connecticut, Virginia, and Utah Residents

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their Personal Information.
- Access and delete certain Personal Information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their Personal Information, taking into account the information's processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights or to appeal a decision regarding a consumer rights request, please Contact Us using any of the methods listed in Contact Us section of this Policy.

EU/EEA Residents

If you are located in the EU or EEA, you have the following rights under the GDPR. All requests should be sent to the address noted in the "Contact Us" section of this Policy, and we will fulfill requests to the extent required by applicable law.

Right of Access. To the extent required by law, you have the right to receive confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; and the recipients or categories of recipient to whom the personal data have been or will be disclosed. We will provide a copy of your personal information in compliance with applicable law.

Right of Rectification. Our goal is to keep your personal information accurate, current, and complete. Please contact us if you believe your information is not accurate or if it changes.

Right to Erasure. In some cases, you have a legal right to request that we delete your personal information when (1) it is no longer necessary for the purposes for which it was collected, (2) consent has been withdrawn in certain instances, (3) you have objected to the processing in certain instances, (4) the personal information has been unlawfully processed, (5) the personal data have to be erased for compliance with a legal obligation; and (6) the personal data were collected in relation to the offer of information society services. However, the right is not absolute. When we delete personal information, it will be removed from our active servers and databases as well as the Platform; but, it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.

Right to Restrict Processing. You have the right to restrict the processing of your data when (1) the accuracy of the personal data is contested, for a period enabling the controller to verify the accuracy of the personal data; (2) the processing is unlawful and you oppose erasure and request a restriction instead; (3) we no longer need the personal data, but you need us to keep it for the establishment, exercise, or defense of legal claims; or (4) you have objected to us processing the personal information, pending resolution of the objection.

Right to Object. In certain circumstances, you have the right to object to the processing of your personal information where the processing is necessary for performance of a task carried out in the public interest, for our legitimate interests, or for the legitimate interests of others. You also have the right to object where personal data are processed for direct marketing purposes or for scientific or historical research purposes or statistical purposes.

Right to Withdraw Consent. If you have provided your consent to the collection, processing, and transfer of your personal information, you may have the right to fully or partially withdraw your consent. Once we have received notice that you have withdrawn your consent, in whole or in part, we will no longer process your information for the purpose(s) to which you originally consented and have since withdrawn unless there are compelling legitimate grounds for further processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal information for the provision of our services.

Right to Complain. If you believe we have not processed your personal information in accordance with applicable provisions of the GDPR, we encourage you to contact us headquarters@aro.org. You also have the right to make a GDPR complaint to the relevant Supervisory Authority or seek a remedy through the courts. A list of Supervisory Authorities is available at: https://edpb.europa.eu/about-edpb/board/members_en. If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law.

INTERNATIONAL DATA TRANSFERS

Your personal information may be transferred to, stored, or processed in the United States. While the data protection, privacy and other laws of another country might not be as comprehensive as those in your country, we take necessary and appropriate steps to protect the privacy and security of your personal information. By using the Platform or requesting services from us, you understand and consent to the collection, storage, processing, and transfer of your information to our facilities in the India and those third parties with whom we share it as described in this Policy.

When storing, hosting, or otherwise processing your information (including personal data), we may send such data outside of the EU and the EEA. When we transfer information to other countries, we do so for the purposes set forth in this Policy and in accordance with applicable law. We rely on recognized legal bases to lawfully conduct cross-border/international transfers of personal information outside of the EU and EEA, such as your express informed consent to do so (as noted above), when transfer is necessary for us to deliver services pursuant to an agreement between us and you, for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person, or when the transfer is subject to safeguards that assure the protection of your personal information, such as the European Commission's approved standard contractual clauses.

LINKS TO OTHER SITES

This Policy only applies to the Platform, and it does not apply to any third-party websites or applications.

The Platform may contain links to, or media and other content from, third-party websites. These links are to external websites and third parties that have their own privacy policies. If you follow any links that direct you away from the Platform, including links to social media sites or to other websites, this Policy will not apply to your activity on the other sites you visit. Because of the dynamic media capabilities of the Platform, it may not be clear to you which links are to the Platform and which are to external, third party websites. If you click on an embedded third-party link, you will be redirected away from the Site to the external third-party website. You can check the URL to confirm that you have left this Platform.

We cannot not (i) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites, (ii) control the privacy policies or the privacy practices of any third parties regarding their independent collection or use of your personal information, or (iii) endorse any third party information, products, services or websites that may be reached through embedded links on this Site.

Any personal information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms of use. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

CHILDREN UNDER 18

The Children's Online Privacy Protection Act ("COPPA"), as well as other data privacy regulations, restrict the collection, use, or disclosure of personal information from and about children on the Internet. The Platform is restricted to the use of adults over the age of majority in their place of residence. No portion of the Site is directed to children under the age of 18, and no one under the age of 18 may access, browse, or use the Site or provide any information to or on the Platform. Consequently, we do not knowingly collect personal identifying information from any person under the age of 18. If we learn that we have collected personal information from a child under age 18 without a parent's or legal guardian's consent, we will take steps to stop collecting that information and delete that information as quickly as possible. If you are a parent or guardian of a child under 18 years of age and you believe your child has provided us with Personal Information, please contact us by email to headquarters@aro.org.

For more information about COPPA, please visit the Federal Trade Commission's website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

UPDATES AND CHANGES TO THIS POLICY

We reserve the right to add to, change, update, or modify this Policy at any time to reflect any changes to how we treat your information or in response to changes in law. In the event we make changes to this Policy, such policy will be re-posted on this page, with the date such modifications were made indicated on the top of the page. If we make material changes to how we treat your information, we may contact you to inform you about the revisions with a link to the revised Policy or notify you through a notice on the homepage of the Site for a reasonable period of time. All changes are effective on the date listed at the top of this page and will apply to all information that we have about you.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, and from time to time, so that you are aware of any changes. Your continued use of the Site or our services after the "Last Updated" date indicates your acceptance of the changes and your continued consent to our processing of your personal data according to the terms of the then-current Policy. If at any point you do not agree to any portion of this Policy, then you should

immediately stop using the Site and the services. Because this Policy contains legal obligations, we encourage you to review this Policy carefully.

CONTACT US

For more information, or if you have any questions concerning this Policy or our information collection, storage and disclosure practices, wish to exercise your rights, or wish to lodge a complaint with us, you may contact us using the information below. Please note, if your communication is sensitive, you may wish to contact us by postal mail or telephone.

In Writing: 5034A Thoroughbred Lane, Suite A, Brentwood, TN, 37027

By Email: headquarters@aro.org