



Privacy Policy

[If you are a student user, please review our Student Privacy Policy.](#)

Carnegie Learning Privacy Policy

Effective: October 31, 2022

This Privacy Policy applies to any websites, software, applications, or interactive features or online services, owned and operated by Carnegie Learning, Inc. (hereinafter “Carnegie Learning,” “we” or “us”) that post a link to or include this Privacy Policy, including the learning platforms we provide access to through separate licensing agreements (“Learning Platforms”) (collectively, our “Sites”). This Privacy Policy also applies to any information we collect offline in connection with use of the Sites.

Please read this Privacy Policy carefully. Please review our [Terms of Use](#), which also applies to your use of the Sites. By accessing, visiting, using, interacting, or submitting information to the Sites, you agree to the practices described in this Privacy Policy.

Note that this privacy policy applies to visitors to our Sites (“Visitors”), which may include teachers, or representatives of schools, learning institutions, school districts, state or local board of education or other sponsoring organizations (“Schools”) that utilize our Learning Platforms. When we provide access to the Learning Platforms through a School agreement, we collect, process, disclose, and store information on behalf of Schools and only in the ways permitted by the applicable School agreement. We otherwise use information as set forth in this policy.

Our Sites are mostly general audience websites and are not intended for use by children younger than age 13 (“Children” and each, a “Child”). However, our Learning Platforms may be used by students authorized and instructed to access and use our Learning Platforms by their School, including Children, for whom we have certain more restrictive practices. To understand our privacy practices with regard to student users, including Children younger than age 13, please review our [Student Privacy Policy](#). By directing your students to our Learning Platforms, you consent on their behalf to our collection, use, and sharing of their information in accordance with our [Student Privacy Policy](#). To the extent there is any conflict between our general privacy practices and our privacy practices with regard to Children, the Student Privacy Policy controls.

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1. INFORMATION WE COLLECT

Carnegie Learning collects information about you directly through our Sites, automatically when you visit the Sites, and sometimes from third parties. Some of this information may be considered “personal information” under various applicable laws. We consider information that identifies you as a specific, identified individual (such as your name and email address) to be personal information. We will also treat additional information, including IP addresses and cookie identifiers, as “personal information” where required by applicable law. Note that we may de-identify personal information so that it is non-personal, such as aggregating or converting it to a code, sometimes using a function commonly known as “hash”. We will treat de-identified information as non-personal to the fullest extent allowed by applicable law. If we combine non-personal information with personal information, then we will treat the combined information as personal information under this Privacy Policy.

Information You Provide Directly

Visitors may provide certain information directly to the Sites, such as when you contact us for information about our products, customer support, or research inquiries, when you register for an account, or when you sign-up for our email mailing list.

In order to obtain access to and use our Learning Platforms, we ask you to register to become a member. During this member registration process, and through other interactions on our Sites and across the Learning Platforms, we collect information that teachers and administrators provide to us as well as information about their students, including, but not limited to, your name, the school or school district you work for, the physical address of your school, your job title, the grades and curricula you teach, your student roster, your email address, and your phone number. When you register for the Learning Platforms, we will also ask you to create a password. When you use the Learning Platforms, we collect information about your interactions with the Learning Platforms, including the courses you use. Some of our Learning Platforms offer live courses, which may be recorded and made available for later viewing within the Learning Platform.

We may also ask you for feedback about usage of various products and services as well as satisfaction with those products and services.

Information We Collect Automatically

We and our third-party business partners may use a variety of technologies that automatically or passively collect certain information when you visit or interact with our Sites (“Usage Information”). Usage Information may include your browser types and versions and operating system you are using, search terms and results within the Sites and all areas of the Sites that you visit, date and time you visit the Sites, the length of your stay on certain courses or pages and your language settings, among other information. In addition, we automatically collect your IP address or other unique identifier (“Device Identifier”) for any computer, mobile phone or other device you may use to access the Sites. A Device Identifier is a number that is automatically assigned to your device used to access the Sites, and our servers identify your device by its Device Identifier. We may be able to collect or infer your approximate location through information we collect, such as IP address.

Many browsers and devices allow you to block the transmission of automatically collected information, such as your IP address, or to block the installation of cookies. You may choose to enable these options. However, enabling these options may prevent you from using many of the core features and functions available on our Sites.

The technologies that may be used to collect Usage Information include the following:



remains on your computer after the browser has been closed). Carnegie Learning may use cookies for many purposes, including, without limitation, to collect information about how you use our Sites (including to track the pages you've visited), to remember you and your settings and your preferences, and to show you personalized content based on information we have collected or inferred about you, such as your school district and your academic interests. This information allows us to customize your Carnegie Learning experience so that your visit is as relevant and as valuable to you as possible.

For more information on cookies, visit <http://www.allaboutcookies.org>.

Web Beacons. We may use web beacons (small graphic images or other web programming code, also known as "1x1 GIFs" or "clear GIFs") and similar technologies on our Sites and within our communications to you. Web beacons can recognize certain types of information on your computer such as cookies, the time and date a page is viewed, and a description of the page where the web beacon is placed. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Sites, to monitor how users navigate the Sites, to count how many e-mails that were sent were actually opened or links were actually viewed and to improve your experience on the Sites. Our web beacons may collect some contact information (for example, the email address associated with an email message that contains a web beacon).

Embedded Scripts. An embedded script is programming code that is designed to collect information about your interactions with the Sites, such as the links you click on. The code is temporarily downloaded onto your device from our web server or a third-party service provider, is active only while you are connected to the Sites, and is deactivated or deleted thereafter.

In addition, we may use a variety of other technologies that collect similar information for security and fraud detection purposes.

"Do Not Track" Signals

Some browsers have "Do Not Track" features that allow you to tell a website not to track you. These features are not all uniform and there is no consensus as to what "Do Not Track" means in this context. Carnegie Learning uses commercially reasonable efforts to detect and process "Do Not Track" signals, but may not respond to "Do Not Track" signals except as specifically required by law. To find out more about "Do Not Track", please visit <http://www.allaboutdnt.com>.

Information We Receive From Schools and School-Affiliated Third Parties

We may receive information about you from Schools or from third parties as directed by Schools or made available through Schools. For example, your School may provide us your name and email address so that we may contact you, such as to send you information on how to register for an account. We may also receive information from your School to confirm that you are an educator or otherwise eligible to sign-up for an account. We may also collect information when you sign-in to use our Learning Platforms and interact with us directly through a separate third party platform with whom your School has a relationship.

Your School is responsible for providing you notice of its own privacy policy(ies) that apply to the personal information we collect from or receive about you and your students through the Learning Platforms on behalf of the School. If you have questions on whether any alternative or supplemental terms apply to the collection, use, and sharing of your information, please contact your School. If you want to amend, remove, modify, or access information submitted to us by a School, please contact your School.

Invite-a-Colleague Features

You may choose to provide us names or other contact information for a colleague to enable them to create an account with the Sites. If you send a communication through the Sites, the information you provide (names, email addresses, etc.) is to facilitate the communication and is not used for other purposes, unless we obtain consent from that person. If you disclose any personal information relating to other people to us, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Social Media Features

The Sites may permit you to interact with a third party platform (such as Google, Facebook, Instagram, Twitter, LinkedIn, and Pinterest) and the Sites, for example "liking" or "sharing" content from the Sites, posting your social media posts to the Sites, including a hashtag associated with us in your social media post, or creating an account or registering with the Service using existing login information from a third-party platform ("Social Media Features"). Also, both we and the third party may have access to certain information about you and your use of the Sites and the third-party service. These third-party social networking companies may collect information about your visit to our Sites through the Social Media Features we have integrated into the Service. Note that through the Social Media Features, these third-party social networking companies may be able to collect certain information about your visits to the Sites regardless of whether or not you affirmatively interact with the Social Media Features and whether or not you are logged into (or have) an account with the social networking company.



through that content. Your use of Social Media Features is subject to the [Terms of Use](#) for the Sites.

The information we collect in connection with Social Media Features is subject to this Privacy Policy; the information the third-party platform collects is subject to the third party's privacy practices (including whether the third party shares information with us, the types of information shared, and your choices about what is visible to others on the third-party platform).

Information We Receive From Other Third Parties

We may receive certain information about you from third parties. If you are on another website and agree to receive information from us, that site will forward your information to us so that we may contact you. We may validate or supplement that information with the information we collect with outside records from other third parties, such as public databases, publicly available social media or other web pages, joint marketing partners, and third parties who enhance the information we have about you. We use this information to respond to your requests, tailor content, offer you products or services that we believe may interest you, enhance our products and services, and for other business purposes. The information collected and stored by third parties is subject solely to the third party's privacy practices.

2. HOW DOES CARNEGIE LEARNING USE THE INFORMATION COLLECTED?

Carnegie Learning may use the information it collects for a number of purposes, including:

- To allow you to participate in the Sites and Learning Platforms, such as to provide information you have requested and provide services in accordance with our agreements with Schools, including to process your registration (including verifying information you provide is active and valid) and to provide customer service
- To analyze and provide academic and learning outcomes based on students' use of the services;
- To contact you with regard to your use of the Sites or similar administrative communications, including changes to the policies governing the Sites;
- To provide information and promotional materials about the products and services we offer;
- To tailor the content and advertising we display to you or others, on the Sites or elsewhere, as well as communications we send to you, and to analyze trends and statistics regarding use of the Sites;
- To analyze the performance and functioning of the Sites, including to test, correct and improve our content, applications and services;
- To develop new applications, products and services;
- To research how users interact with the Sites, conduct surveys, and to perform other market research;
- To manage Carnegie Learning's everyday business needs, such as administration and improvement of our Sites and related services;
- For other internal business and legal purposes, including investigation of information security and information asset protection-related incidents and to protect against fraud or other potentially illegal activities, to enforce our Terms of Use, to comply with all applicable laws and regulations and Carnegie Learning's corporate reporting obligations, and to enforce Carnegie Learning's agreements;
- For external academic research and scholarship.

3. WHEN DOES CARNEGIE LEARNING SHARE INFORMATION?

Carnegie Learning may share non-personal information, such as aggregate user statistics, de-identified or hashed information (such as hashed email addresses), and Usage Information, with third parties, unless prohibited by applicable law or our agreement with a School. For example, Carnegie Learning may provide other businesses and members of the public, aggregated statistical data showing general usage patterns and statistics about our Sites, interactions, and transactions, or otherwise share non-personal information in its discretion, including for targeted advertising purposes.

Carnegie Learning does not share your personal information with unaffiliated third parties for their own direct marketing purposes without your consent. You may withdraw your consent to further data sharing at any time.

We may share the information we have collected about you as described in this Privacy Policy, including:

Companies Providing Services on our Behalf

Carnegie Learning may share your information with third parties who perform services and functions on our behalf to support our interactions with you including, for example, by fulfilling information requests, administering surveys or contests, providing necessary technical services, or communicating with you. However, all such third parties have no independent rights to your information and are prohibited from using your information in any way that contradicts Carnegie Learning's privacy policy. Our third-party service providers may be located in the U.S., Canada or other foreign jurisdictions.

Schools and School-Affiliated Third Parties

As discussed above, we provide the access to our Learning Platforms through agreements with Schools. Accordingly, Schools (and those who obtain authorized access from the Schools, including administrators) have access to all of the information we collected via registration and interactions with the Learning Platforms (including courses and videos viewed or used and how you interact with those courses and videos) by users associated with that



Platforms through a third-party platform with whom your School has a relationship. When you choose to sign-in through a third-party platform, data collected through your use of the Learning Platforms may be shared with those third parties.

We encourage you to read the privacy policies of the Schools and third-party platforms you use that may collect and use your information and the information that we share via registration and interactions with the Learning Platforms, as those parties have their own policies. Please contact us as detailed below if you have questions about which entities may be involved.

When You Agree to Receive Information from Third Parties or Request That We Share Your Information

We may share information when you direct us to do so. For example, you may be presented with an opportunity to receive marketing offers from a third party or you may engage with Social Media Features or other third-party application or feature, through which information about you is shared. Please note that we are not responsible for the privacy practices of third parties. If you later decide that you no longer want to receive communications from a third party, you will need to contact that third party directly.

Business and Legal Purposes

We may share user information, including personal information, to third parties, including, but not limited to, for the following purposes: enforce our Terms of Use; protect Carnegie Learning's property, services and legal rights; prevent physical harm to the persons or property of others; prevent fraud or potentially illegal activities against Carnegie Learning and others; support auditing, compliance, and corporate governance functions; test, correct, and improve our content, applications, and services; develop new applications, products, and services; analyze academic and learning outcomes and preferences; for external academic research and scholarship; comply with subpoenas, court orders, or similar legal processes, including from law enforcement agencies, regulators and courts; comply with any and all applicable laws; and we may also use Device Identifiers, including IP addresses, to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion.

Business Transfers

Carnegie Learning also may share personal or other information with its subsidiaries and affiliates, primarily for business and operational purposes.

Carnegie Learning may also share personal or other information in the event of an acquisition, reorganization or merger of Carnegie Learning or its assets, including, without limitation, during the course of any due diligence process, Carnegie Learning reserves the right to disclose and transfer all information related to the Sites, including personal information.

Sweepstakes, Contests, and Promotions

We may offer sweepstakes, contests or other promotions (any, a "Promotion"), that may require registration. By participating in a Promotion, you are agreeing to the provisions, conditions, or official rules that govern that Promotion, which may contain specific requirements of you (including, without limitation and except where prohibited by law, allowing the sponsor(s) of the Promotion to use your name, voice, likeness or other indicia of persona in advertising or marketing materials). If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion, including, without limitation, in connection with winner selection, prize fulfillment, as required by law or permitted by the Promotion's terms or official rules (such as on a winners list).

4. THIRD-PARTY ADVERTISING AND ANALYTICS COMPANIES AND SIMILAR THIRD PARTIES

Carnegie Learning works with third parties, such as analytics companies, network advertisers, ad agencies, and others who provide us with information about the Sites, users, and our advertisements, and who serve our advertisements on our Sites and elsewhere online. We and our third-party business partners collect certain information about your visits to and activity on our Service and other websites and services, and may use this information to target advertising to you and others and to assess the effectiveness of our advertising. We may also share (or permit third parties to collect) certain information, such as Usage Information, aggregated or de-identified or hashed information, with these third parties for similar purposes.

These third parties may set and access their own tracking technologies on your device (including cookies and web beacons) and may otherwise collect or have access to your personal information over time, including your visits to and activity on the Sites as well as other websites and online services.

Your Advertising Choices: Some of these third parties may be members of the Network Advertising Initiative ("NAI") or Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising. Both NAI and DAA provide information regarding procedures for opting-out of targeted online advertising from participating companies. For information from NAI about opting out, [click here](#). For information from DAA about opting out [click here](#). If you are a California resident, please see our "[California Privacy Notice](#)" for more information about your rights.



from Google, [click here](#), and to download the Google Analytics opt-out browser add-on from Google, [click here](#).

5. SECURITY

Carnegie Learning takes commercially reasonable steps to help protect and secure personal information. We have implemented an information security program with numerous measures, including administrative, technical and physical controls that are designed to reasonably safeguard information that can individually identify you against the loss, misuse and alteration of the information under our control. However, please remember that no data storage or data transmission over the Internet, or by other means, can be guaranteed to be 100% secure. Thus, while we strive to protect your personal data, Carnegie Learning cannot ensure or warrant the security of any information you transmit to us. Therefore, you understand, acknowledge, and agree that you transmit certain personal information to the Sites at your own risk.

6. THIRD PARTY LINKS OR CONTENT

The Sites may contain links to other web sites or include other content hosted and served by third parties that Carnegie Learning does not control. The third parties whose content appears on the Sites may collect information about you through the use of cookies and web beacons, may independently collect or solicit personal information, and may have the ability to track your use of their sites and services. Likewise, our content, including some of our Learning Platforms, may be provided through or be included on third parties' web pages and web sites that are not associated with Carnegie Learning and over which we have no control. We may collect Usage Information through Carnegie Learning content appearing on third party sites. Carnegie Learning is not responsible for the privacy practices of any third party.

7. CONSENT TO TRANSFER OF DATA

Carnegie Learning is a United States company. If you are a user of the Sites outside of the United States, by using the Sites and/or providing us with information, you acknowledge and agree that your personal information may be processed for the purposes identified in the Privacy Policy. In addition, we and our Canadian, US and other foreign service providers, may process your personal information in the country in which it was collected and in other countries, including the United States. By providing your information, you fully understand and unambiguously consent to this transfer, processing, and storage of your information in the United States and other jurisdictions, where laws regarding processing of personal information may be less stringent than the laws in your country, and where governments, courts or law enforcement or regulatory agencies in those other countries may be able to obtain disclosure of that personal information through the laws of those countries.

8. WHAT ARE YOUR CHOICES ABOUT YOUR INFORMATION?

Members can review, modify, and delete certain information related to your use of our Sites by accessing your Carnegie Learning account. If you use our Learning Platforms through an agreement with a School and want to amend, remove, modify, or access information not otherwise available through your account, please contact your School.

Visitors to the Sites can also ask us to update your information by contacting us at privacy@carnegielearning.com. For users of the Learning Platforms, you may need consent from the applicable School to modify information we hold.

Canadian residents please refer to the "Notice for Canadian Residents" section below for further details regarding your choices.

You can unsubscribe from email by following the instructions contained within the email you receive from us.

Members can also manage your communication settings in our Subscription Center when logged into your account: <https://discover.carnegielearning.com/Subscription-Center.html>.

Note that we reserve the right to send you certain email or postal communications relating to your use of the Sites, announcements, notices of changes to this Privacy Policy or our other terms, or similar administrative or transactional messages, and these transactional messages may be unaffected if you choose to opt-out from marketing emails.

If you sign up to receive SMS or MMS messages from Carnegie Learning, you may unsubscribe from any SMS or MMS messages received by replying "STOP".

9. CHANGES TO THIS PRIVACY POLICY

We ask that you periodically review our Privacy Policy to be sure you are familiar with the most current version. The Policy will state its effective date, which is the most recent date on which we revised the Policy.

To the extent allowed by applicable law and our agreement with a School, as applicable, Carnegie Learning reserves the right to make changes to our Privacy Policy at any time. Any changes will be effective upon posting, unless otherwise indicated. Your continued use of the Sites after the effective date of the revised Privacy Policy (or other act as specified in the revised Privacy Policy) will constitute your consent to those changes to the fullest extent allowed by applicable law. If we make material changes to the way we treat personal information we have previously collected about you, we will provide



consent for children), as required by law. You may need to consent to new Privacy Policy in order to continue using the Sites.

10. INFORMATION FOR CALIFORNIA RESIDENTS

A. California Privacy Notice

Under the California Consumer Privacy Act or “CCPA”, California residents have certain privacy rights with respect to the personal information we collect. If you are a California resident with whom we have a direct business or potential business relationship, this section applies to you. Because Carnegie Learning collects personal information through the Sites from individuals acting on behalf of a business in the context of providing a service, at this time Carnegie Learning is not subject to most provisions of the CCPA.

Carnegie Learning does not sell your personal information for monetary compensation, however depending on the types of activities on the Sites, Carnegie Learning may provide a tool to opt-out of certain cookies and other tracking technology, including, if applicable, some that may be considered “sales” under CCPA. In some cases we may provide an opt-out tool even where we are not sharing your personal information in exchange for valuable consideration. To opt out from the collection or sharing of information through certain types of cookies, including those that may be considered “sales” under California law, open the [Cookie Preference Center](#) and click on Targeting Cookies/Do Not Sell My Personal Information and move the toggle switch to the left.

The Digital Advertising Alliance (“DAA”) also offers tools for California residents to send requests under the CCPA to opt out of the sale of personal information by participating companies (<https://www.privacyrights.info/>).

Carnegie Learning also collects personal information as a service provider on behalf of and only in the ways permitted by our customers. If you are a California resident and would like to submit a request to access or delete information under the CCPA, please direct your request to your School administrator.

B. California’s Shine the Light Law

Carnegie Learning does not share personal information with third parties for the third parties’ direct marketing purposes without your specific consent (opt-in or opt-out).

C. California Residents Under the Age of 18 Only

If you have created an account with the Sites, you may request that we remove content or information that you have publicly posted by sending an email message to privacy@carnegielearning.com that includes: your mailing address and a detailed description of the content or information. At our option, we may either remove your personal information (and not other user content) or remove all of the content and information. Note that if you have access to our Learning Platforms through an agreement with a School, we may not be able to remove your information and you may need to request removal from your School.

11. INFORMATION FOR NEVADA CONSUMERS

Carnegie Learning does not currently sell your covered information as those terms are defined under applicable Nevada law. You may still submit an opt-out request and we will honor that request as required by Nevada law if Carnegie Learning were to engage in such a sale in the future. If you are a Nevada resident or the parent of a Nevada Child User, and you would like to exercise this right, please email us at privacy@carnegielearning.com and put “Your Nevada Privacy Rights” in the subject field of your request.

12. CONTACT US

For any questions about Carnegie Learning, our privacy policies, or to request review and/or removal of information collected by Carnegie Learning, please call us toll free at 1-888-851-7094 or contact us at:

Steve Sernett

Vice President of Legal and Corporate Counsel

Carnegie Learning, Inc.

501 Grant Street

Union Trust Building, Suite 1075

Pittsburgh, PA 15219

<https://www.carnegielearning.com/privacy-policy/>



To report technical issues with the Site or apps, or to submit feature requests, please Contact Us using the appropriate form.

NOTICE FOR CANADIAN RESIDENTS

Please note, you may withdraw consent at any time (subject to legal or contractual restrictions and reasonable notice). Subject to certain limits set out in the applicable laws, Canadian residents also have the right to request access to the personal information that Carnegie Learning collects and to update or correct personal information if it is inaccurate. We may need to verify your identity before implementing your request.

Subject to applicable law, if you are a Canadian resident and would like to submit a request to access your personal information or to withdraw consent to the processing of your personal data, you must submit your request to Steve Sernett by sending an email to privacy@carnegielearning.com or calling **1-888-851-7094**. You may also use this contact to submit any requests for information on our privacy practices or to submit a complaint regarding our practices.

Your request or complaint must include your full name, street address, city, province, postal code, and an email address so that we are able to contact you if needed regarding this request.

We cannot properly process requests or complaints that do not come through the designated request mechanism or do not contain sufficient information to allow us to process your request. You may also be required to take reasonable steps as we determine from time to time in order to verify your identity and/or the authenticity of the request. Once your request is processed, absent exemptions, we will provide you with details regarding what personal information we have, how it is used, and with which third parties it is shared.

You and We confirm that it is our wish that this Privacy Policy, the Terms of Use, and all other related policies be drawn up in English. *Vous reconnaissez avoir exigé la rédaction en anglais du présent document ainsi que tous les documents qui s'y rattachent.*

NOTICE FOR UNITED KINGDOM/EUROPEAN/SWITZERLAND RESIDENTS

Notice to Individuals Located in the United Kingdom (UK) and European Economic Area (EEA) and Switzerland

If you are a resident of the United Kingdom (UK), European Union or other EEA countries, or of Switzerland, the following information applies.

Purposes of processing and legal basis for processing: As explained above, we process personal information in various ways depending upon your use of our Sites. We process personal information on the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Sites; and (3) as necessary for our legitimate interests in providing the Sites where those interests do not override your fundamental rights and freedoms related to data privacy.

Right to lodge a complaint: Users that reside in the UK or EEA or Switzerland have the right to seek information and assistance or lodge a complaint about our data collection and processing actions with the supervisory authority where they reside. Contact details for data protection authorities are available here. **UK:** <https://ico.org.uk/>, **EEA:** https://edpb.europa.eu/about-edpb/board/members_en, **Switzerland:** <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html>.

Transfers: Personal information we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or subcontractors maintain facilities. We ensure that transfers of personal information to a third country or an international organization are subject to appropriate safeguards as described in Article 45-49 of the GDPR.

Withdraw consent: If we have collected personal information with your consent, you have the right to withdraw that consent at any time.

Access: You have the right to request access to personal information we collected about you and information about its sources, purposes, and sharing..

Correction: You have the right to request that we correct the personal information we hold about you if it is inaccurate or incomplete.

Erasure: You have the right to request that we erase data we have collected from you. Please note that we may have a reason to deny your deletion request or delete data in a more limited way than you anticipated, e.g., because of a legal obligation to retain it.

Portability: You have the right, in certain circumstances, to request that we provide your personal information to you in a format that can be transferred to another entity.

Restrict Processing: You have the right, in certain circumstances, to request that we limit our processing of your personal information if you are contesting the accuracy of your personal information; asserting that our processing is unlawful; asserting that we no longer need to keep the information for reasons related to the establishment, exercise, or defense of legal claims, or you object to our processing.



statistics.

Automated Decisionmaking: You have the right, in certain circumstances, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects on you.

Verification Procedures: We must verify your identity for everyone's protection, so we may require you to provide us with verification information prior to accessing any records containing personal information about you. We do this by:

- Asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email or telephone account stated in the request; or
- Having you submit your request through your account page, which will automatically verify your identity and will result in faster processing of your request.

We will use the information you provide for verification only for the purpose of verification. We may have a reason under the law why we do not have to respond to your request or respond to it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Our Representative in the EEA:

Rickert Rechtsanwaltsgesellschaft mbH

- Carnegie Learning, Inc. -

Colmantstraße 15

53115 Bonn

Germany

Art-27-rep-carnegie@rickert.law

D. Notice to Residents of Brazil

If you are a resident of Brazil, the following information applies.

Purposes of processing and legal basis for processing: As explained above, we process personal information in various ways depending upon your use of our Sites. We process personal information on the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Sites; and (3) as necessary for our legitimate interests in providing the Sites where those interests do not override your fundamental rights and freedoms related to data privacy.

Right to lodge a complaint: Users that reside in Brazil have the right to seek information and assistance or lodge a complaint about our data collection and processing actions with the *Agência Nacional de Proteção de Dados*, "ANPD", www.gov.br/anpd/pt-br.

Transfers: Personal information we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or subcontractors maintain facilities. We ensure that transfers of personal information to a third country or an international organization are subject to appropriate safeguards as described in Articles 33-36 of the *Lei Geral de Proteção de Dados Pessoais* (LGDP).

Withdraw consent: If we have collected personal information with your consent, you have the right to withdraw that consent at any time.

Access: You have the right to request access to personal information we collected about you and information about its use and sharing.

Correction: You have the right to request that we correct the personal information we hold about you if it is inaccurate, incomplete, or outdated.

Erasure: You have the right to request that we erase data we have collected from you in some cases. Please note that we may have a reason to deny your deletion request or delete data in a more limited way than you anticipated, e.g., because of a legal obligation to retain it.

Portability: You have the right, in certain circumstances, to request that we provide your personal information to you in a format that can be transferred to another entity.

Automated Decisionmaking: You have the right to request information about a decision based solely on automated processing, including profiling, and request a review of such decisions.

Verification Procedures: We must verify your identity for everyone's protection, so we may require you to provide us with verification information prior to accessing any records containing personal information about you. We do this by:



Having you submit your request through your account page, which will automatically verify your identity and will result in faster processing of your request.

We will use the information you provide for verification only for the purpose of verification. We may have a reason under the law why we do not have to respond to your request or respond to it in a more limited way than you anticipated. If we do, we will explain that to you in our response.



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