

# Privacy Policy

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

## Carnegie Learning Privacy Policy

Updated and Effective: January 3, 2024

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.

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” or “personal data”, some of which may be “sensitive”, 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 or pseudonymize 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 maintain and use de-identified data without attempting to re-identify it, except where permitted by applicable law, such as to determine whether our de-identification processes satisfy legal requirements. We will treat de-identified and pseudonymized 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:

**Cookies.** When you use our Sites, Carnegie Learning may store data in “cookies” or similar technology on your devices, which are data files placed on your computer or other device when you visit the Sites or otherwise access our online content. We use both session and persistent cookies (which remain 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 Tags.** We may use web tags (small graphic images or other web programming code, also known as “1x1 GIFs” or “clear GIFs” or “pixels” or “beacons”) and similar technologies on our Sites and within our communications to you. Web tags 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 tags or similar technologies may be used for a number of purposes by us and our third-party providers, 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, to improve your experience on the Sites, or for marketing and targeted advertising purposes. Our web tags may collect some contact information (for example, the email address associated with an email message that contains a web tags).

**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.

website analytics, to improve the Sites and our products and services, and to address functionality issues.

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

**Chat Boxes.** When you participate in our chat feature, Carnegie Learning can record and use your communications and the information you provide in order to assist you during the chat session, provide customer support, to improve our products and services, and for marketing purposes. If you do not consent, please do not continue with chat assistance.

### ***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.

If you use Social Media Features, your interaction and personal information may be publicly disclosed on the Sites and on the third-party platform. If others give us access to their profile, page, or other content on a third-party platform, we may also receive information about you if it is accessible 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 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 pseudonymized or hashed information (such as hashed email addresses), and Usage Information, with third parties in our discretion, including for targeted advertising purposes, 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 (including personal information) in the circumstances described below or elsewhere in this Privacy Policy as disclosed at the time you provide information, or otherwise with your consent.

#### **Affiliates and Subsidiaries**

Carnegie Learning may share personal or other information among Carnegie Learning companies such as subsidiaries and affiliates, including for marketing purposes.

#### ***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 collect 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 School.

A School may also direct us to share information with a third party affiliated with the School. For example, you may be asked to sign-in to our Learning 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 Direct 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 applications or features, 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***

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 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 Sites 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 tags) 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, some of which may be personal information or personal data under various state laws.

**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.

We also use Google Analytics, which uses cookies and other technologies to collect and analyze information about use of the Site and provide other reports. This service may also collect information regarding your use of other websites, apps, and online resources. For information about opting out 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 tags, 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?

**Access, Correction, and Deletion:** Members can access, correct, 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](mailto:privacy@carnegielearning.com). For users of the Learning Platforms, you may need consent from the applicable School to modify information we hold.

If you are a California resident, please see our [Notice to California Residents](#). Canadian residents please refer to the ["Notice for Canadian Residents"](#) section below for further details regarding your choices.

### **Marketing Messages from us**

- **Email:** 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.
- **Text Messages:** If you sign up to receive SMS or MMS or RCS messages from Carnegie Learning, you may unsubscribe from any SMS or MMS or RCS 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 notice through the Sites and may also notify you in other ways, such as by email to your registered email address, in our discretion. However, we will not make material changes to how we treat previously collected personal information without your consent (opt-in or opt-out for adults and prior parental consent for Children), as required by law. You may need to consent to the new Privacy Policy in order to continuing using the Sites.

## 10. 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](tel:1-888-851-7094) or contact us at:

Steve Sernett

Vice President of Legal and Corporate Counsel

Carnegie Learning, Inc.

4 Smithfield Street

8<sup>th</sup> floor

Pittsburgh, PA 15222

[privacy@carnegielearning.com](mailto:privacy@carnegielearning.com)

## 11. 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](mailto:privacy@carnegielearning.com) or calling [1-888-851-7094](tel: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.*

## 12. 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](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 (1) contesting the accuracy of your personal information, (2) asserting that our processing is unlawful; (3) 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.

**Object:** You have the right to object to our processing if we are processing your personal information based on legitimate interests, using your personal information for direct marketing (including profiling), or processing your personal information for purposes of scientific or historical research and statistics.



**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](mailto:Art-27-rep-carnegie@rickert.law)

### 13. 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](http://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:

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.



## IV. NOTICE TO CALIFORNIA RESIDENTS

### A. California Privacy Notice

**This California Privacy Notice is updated and effective as of January 3, 2024**

California consumers have certain privacy rights with respect to the personal information we collect. **If you are a California consumer with whom we have a direct business or potential business relationship, this section applies to you.**

This California Privacy Notice sets forth the disclosures and rights for California Consumers regarding their personal information, as required by the California Consumer Privacy Act of 2018 ("CCPA"), the California Privacy Rights Act of 2020 ("CPRA"), and any implementing regulations adopted thereunder. Terms (including defined capitalized terms) used in this California Privacy Notice have the same meanings given in the CCPA and CPRA and the associated regulations, unless otherwise defined.

### EXERCISING YOUR CALIFORNIA RIGHTS

California consumers have the right to request: (1) that we disclose to you what personal information we collect, use, disclose, and sell, including the right to request that we provide to you the categories and specific pieces of personal information we have collected about you ("**Right to Know**"); (2) that we delete the personal information we have collected from you ("**Right to Delete**"); (3) that we correct inaccurate personal information we hold about you ("**Right to Correct**"), (4) to opt-out from the sharing of your personal information to a third party for cross-context behavioral advertising (i.e., targeted advertising) ("**Right to Opt-Out of Sharing**"), (5) and to opt-out from the sale of their personal information ("**Right to Opt-Out of Sale**"), all subject to the meanings and exceptions set forth in the CCPA and CPRA. More information on each of these rights is below.

In your request, you must provide enough information to allow us to verify you are the person about whom we collected personal information, or their authorized representative. You must also describe your request with enough detail so that we can understand, evaluate, and respond to it. We can't respond to your request if we can't verify your identity. Making such a request does not require you to create an account with us, and we will only use the information you provide in a request to verify your identity.

#### Verifying Your Requests

We will take reasonable steps to verify your identity based upon the information you provide and the type of request you are making.

When you exercise your Right to Know, Right to Delete, and/or Right to Correct Inaccurate Information, we may ask that you provide us with information, beyond your full name, in order to verify your identity and fulfill your request. If we are unable to verify that the individual submitting the request is the same individual about whom we have collected information (or someone authorized by that individual to act on their behalf), we will not be able to process the request.

#### Agents

If you are an authorized representative submitting a request on a user's behalf, please complete the applicable request per the instructions below. We will follow up to request a signed, written permission signed by the individual who is the subject of the request authorizing you to make the request on their behalf. The written permission must state your full legal name, the full legal name of the individual who is the subject of the request and needs to be clear about the permission granted. Alternatively, you may submit a copy of a power of attorney under Probate Code sections 4000-4465. In either case, please also indicate in your email the nature of your request. The consumer's identity, in addition to your own, will need to be independently verified in order for us to be able to fulfill your request. We may also ask the consumer to directly confirm with us that they provided you permission to submit a request. Please keep in mind that if we do not receive adequate proof that you are authorized to act on the consumer's behalf, we may deny the request.

#### Right to Know

California consumers have the right to know what information we have collected about you (the categories and the specific pieces of information).

If you are a California consumer with whom we have a direct business or potential business relationship and would like to exercise your Right to Know, please submit your request by emailing [privacy@carnegielearning.com](mailto:privacy@carnegielearning.com). In order to have us provide specific pieces of information, we may require a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

#### Right to Delete

California consumers have the right to request that we delete information we have collected from you. If you are a California consumer with whom we have a direct business or potential business relationship and would like to exercise your Right to Delete, please submit your request by emailing [privacy@carnegielearning.com](mailto:privacy@carnegielearning.com).

#### Right to Limit The Use and Disclosure of Sensitive Personal Information

Under the CPRA Regulations, a business must only provide the Right to Limit The Use and Disclosure of Sensitive Personal Information when sensitive personal information is not collected or processed for the purpose of inferring characteristics about a consumer, or does not fall under certain statutory exceptions, pursuant to CPRA §1798.121. Carnegie Learning's use and disclosure of sensitive personal information is not used for such purpose and/or falls within the statutory exceptions, and we therefore do not offer such this right at this time.

#### **Right to Opt-Out of Sharing**

California consumers have the right to opt-out of the sharing of your personal information to a third party for cross-context behavioral advertising (i.e., targeted advertising), whether or not for monetary or other valuable consideration. If you are a California consumer with whom we have a direct business or potential business relationship and would like exercise your Right to Opt-Out of Sharing, please submit your request by emailing [privacy@carnegielearning.com](mailto:privacy@carnegielearning.com).

#### **Right to Opt-Out of Sale**

California consumers have the right to opt-out of the sale of your personal information. If you are a California consumer with whom we have a direct business or potential business relationship and would like exercise your Right to Opt-Out of Sale, please submit your request by emailing [privacy@carnegielearning.com](mailto:privacy@carnegielearning.com).

#### **Other Important Information for Do Not Sell or Share**

Carnegie Learning engages in online advertising practices (and certain analytics or similar activities), which may be considered a "sale" or "share" for cross-context behavioral advertising as defined in the CCPA and CPRA. To disable sharing through cookies set by 3rd parties that may be considered "sales" or "sharing" under the CCPA and CPRA, click here: [Include a direct link to open the cookie manager and instructions.]In addition, the Digital Advertising Alliance ("DAA") also offers tools for California consumers to send requests under the CCPA and CPRA to opt out of the sale of personal information by some or all of the participating companies (<https://www.privacyrights.info/>).

#### **Data Retention**

We will retain all categories of personal information described in this California Privacy Notice for as long as it is reasonably necessary for the purposes set out in this California Privacy Notice, considering the time period reasonably necessary to: provide the Sites to you; exercise the choices and rights you have requested; comply with our contractual obligations; enforce our terms for use of the Sites; and, comply with legal and regulatory requirements. Except as noted differently on specific pages or apps, we retain your personal information while you have an account with us, or while you are using our Sites or continuing to visit us.

#### **Users Younger than 16**

Carnegie Learning does not knowingly sell or share personal information of users younger than 16.

#### **Right to Non-Discrimination for the Exercise of Privacy Rights**

California consumers have the right to not receive discriminatory treatment for exercising CCPA and CPRA rights. We will not discriminate against you for exercising your CCPA and CPRA rights.

#### **Do Not Track**

Some browsers incorporate a 'Do Not Track' (DNT) feature that, when turned on, signals to websites and online services that you do not wish to be tracked. Because there is not yet an accepted standard for how to respond to browser DNT signals, we do not currently respond to them.

#### **PERSONAL INFORMATION WE COLLECT**

The personal information we collect about you will depend upon how you use the Carnegie Learning Site and Learning Platform or otherwise interact with us. Accordingly, we may not collect all of the below information about you.

In addition to the below, we may collect and/or use additional types of information and will do so after providing notice to you and obtaining your consent to the extent such notice and consent is required by the CCPA and CPRA.

Category of Personal Information Collected	from which the Information was Collected	Business or Commercial Purpose(s) for which Information is Collected	whom this type of Personal Information is Disclosed for a Business Purpose	Personal Information is Sold or Shared for Cross Contextual Behavioral Advertising
<b>Identifiers</b> (such as name, email address, contact information, IP address)	<p>We may collect this type of information from:</p> <ul style="list-style-type: none"> <li>You,</li> <li>Affiliated Companies,</li> <li>School/Education Institution Customers,</li> <li>Third party business partners,</li> <li>Cookies and Tracking Technologies</li> </ul>	<p>We may use this type of information to:</p> <ul style="list-style-type: none"> <li>to provide access to our products and services, or to provide quotes or offers for, and updates about, our products and services;</li> <li>to send a confirmation notice to the Registrant of the registration;</li> <li>to administer and manage accounts, including password resetting, responding to questions raised by Registrants, to contact the Registrant about any problems with the Registrant's account or conduct on the Site;</li> <li>to send out notifications or emails about the Site including information about current events, changes, improvements, upgrades, and rules of the Site;</li> <li>for administrative, planning, product or service development, quality control and research purposes relating to our products and services;</li> <li>or marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so. Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send;</li> <li>to comply with the law and protect us, our consumers or the general public;</li> <li>for other purposes described to you at the time of collection or otherwise with your consent or as consistent with this Privacy Policy.</li> </ul>	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> <li>Subsidiaries and Affiliates</li> <li>School/Education Institution Customers</li> <li>Service Providers,</li> <li>Third parties or affiliated companies when you agree to or direct that we share your information with them.</li> <li>Third parties who may acquire your information as a result of a merger, acquisition or otherwise ownership transition.</li> <li>Law enforcement, government entities, or others if required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders);</li> <li>Third parties we partner with for contests, sweepstakes, or promotions,</li> <li>Third party advertising and analytics companies</li> </ul>	<p>Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a "sale" or "share" under the CCPA and CPRA under certain circumstances.</p>

Category of Personal Information Collected	from which the Information was Collected	Business or Commercial Purpose(s) for which Information is Collected	whom this type of Personal Information is Disclosed for a Business Purpose	Personal Information is Sold or Shared for Cross Contextual Behavioral Advertising
<p><b>Any categories of Personal Information described in subdivision (v) of Section 1798.140</b> (such as name, signature, address, phone number, and other categories of information classified as “personal” under this California law) Note: information in this category may overlap with other categories.</p>	<p>We may collect this type of information from:</p> <ul style="list-style-type: none"> <li>• You,</li> <li>• Affiliated Companies,</li> <li>• School/Education Institution Customers,</li> <li>• Third party business partners,</li> <li>• Cookies and Tracking Technologies</li> </ul>	<p>We may this this type of information to:</p> <ul style="list-style-type: none"> <li>• to provide access to our products and services, or to provide quotes or offers for, and updates about, our products and services;</li> <li>• to send a confirmation notice to the Registrant of the registration;</li> <li>• to administer and manage accounts, including password resetting, responding to questions raised by Registrants, to contact the Registrant about any problems with the Registrant’s account or conduct on the Site;</li> <li>• to send out notifications or emails about the Site including information about current events, changes, improvements, upgrades, and rules of the Site;</li> <li>• for administrative, planning, product or service development, quality control and research purposes relating to our products and services;</li> <li>• for marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so. Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send;</li> <li>• to comply with the law and protect us, our consumers or the general public;</li> <li>• for other purposes described to you at the time of collection or otherwise with your consent or as consistent with this Privacy Policy.</li> </ul>	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• School/Education Institution Customers</li> <li>• Service Providers,</li> <li>• Third parties or affiliated companies when you agree to or direct that we share your information with them.</li> <li>• Third parties who may acquire your information as a result of a merger, acquisition or otherwise ownership transition.</li> <li>• Law enforcement, government entities, or others if required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders);</li> <li>• Third parties we partner with for contests, sweepstakes, or promotions,</li> <li>• Third party advertising and analytics companies</li> </ul>	<p>Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a “sale” or “share” under the CCPA and CPRA under certain circumstances.</p>

Category of Personal Information Collected	from which the Information was Collected	Business or Commercial Purpose(s) for which Information is Collected	whom this type of Personal Information is Disclosed for a Business Purpose	Personal Information is Sold or Shared for Cross Contextual Behavioral Advertising
<p><b>Audio, electronic, visual, thermal, olfactory, or similar information</b></p> <p>This category includes, for example, images, video, or audio recordings.</p>	<p>We may collect this type of information from:</p> <ul style="list-style-type: none"> <li>You</li> <li>Affiliated Companies</li> <li>School/Education Institution Customers</li> <li>Third party business partners</li> </ul>	<p>We may use this type of information to:</p> <ul style="list-style-type: none"> <li>to provide access to our products and services, or to provide quotes or offers for, and updates about, our products and services;</li> <li>for administrative, planning, product or service development, quality control and research purposes relating to our products and services;</li> <li>for marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so. Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send;</li> <li>to comply with the law and protect us, our consumers or the general public;</li> <li>for other purposes described to you at the time of collection or otherwise with your consent or as consistent with this Privacy Policy.</li> </ul>	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> <li>Subsidiaries and Affiliates</li> <li>School/Education Institution Customers</li> <li>Service Providers,</li> <li>Third parties or affiliated companies when you agree to or direct that we share your information with them.</li> <li>Third parties who may acquire your information as a result of a merger, acquisition or otherwise ownership transition.</li> <li>Law enforcement, government entities, or others if required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders);</li> <li>Third party advertising and analytics companies</li> </ul>	<p>We do not sell or share this category of information.</p>



Category of Personal Information Collected	from which the Information was Collected	Business or Commercial Purpose(s) for which Information is Collected	whom this type of Personal Information is Disclosed for a Business Purpose	Personal Information is Sold or Shared for Cross Contextual Behavioral Advertising
<b>Inferences drawn from any of the information identified above to create a profile about You</b>  (such as preferences, characteristics, predispositions and behaviors)	We may collect this type of information from: <ul style="list-style-type: none"><li>• You,</li><li>• Affiliated Companies,</li><li>• School/Education Institution Customers,</li><li>• Third party business partners,</li><li>• Cookies and Tracking Technologies</li></ul>	We may use this type of information to: <ul style="list-style-type: none"><li>• to provide access to our products and services, or to provide quotes or offers for, and updates about, our products and services;</li><li>• to send a confirmation notice to the Registrant of the registration;</li><li>• to administer and manage accounts, including password resetting, responding to questions raised by Registrants, to contact the Registrant about any problems with the Registrant's account or conduct on the Site;</li><li>• to send out notifications or emails about the Site including information about current events, changes, improvements, upgrades, and rules of the Site;</li><li>• for administrative, planning, product or service development, quality control and research purposes relating to our products and services;</li><li>• for marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so. Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send;</li><li>• to comply with the law and protect us, our consumers or the general public;</li><li>• for other purposes described to you at the time of collection or otherwise with your consent or as consistent with this Privacy Policy.</li></ul>	We may disclose this type of information to: <ul style="list-style-type: none"><li>• Subsidiaries and Affiliates</li><li>• School/Education Institution Customers</li><li>• Service Providers,</li><li>• Third parties or affiliated companies when you agree to or direct that we share your information with them.</li><li>• Third parties who may acquire your information as a result of a merger, acquisition or otherwise ownership transition.</li><li>• Law enforcement, government entities, or others if required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders);</li><li>• Third parties we partner with for contests, sweepstakes, or promotions,</li><li>• Third party advertising and analytics companies</li></ul>	Third party advertising, analytics, and other similar business partners may have access to this data, and this may be considered a "sale" or "share" under the CCPA and CPRA under certain circumstances.

## QUESTIONS AND CONTACT INFORMATION

If you have questions about any of these rights, please email [privacy@carnegielearning.com](mailto:privacy@carnegielearning.com)

### 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).

## Connect With Us



4 Smithfield Street, Floor 8  
Pittsburgh, PA 15222  
P: [888.851.7094](tel:888.851.7094)

LET'S TALK

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