

## Privacy Policy

The Consumer Learning Center (collectively, “we,” “us,” “our”) provide this Privacy Policy to help you understand how we collect, use, share, and safeguard your personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to questions you may have about our privacy practices.

### **Types Of Information We Collect**

We collect information about you in a variety of ways depending on how you interact with us. Some of the information we collect includes personal information that can be used to identify you. The following provides details about the information (including non-exhaustive examples) we collect and how we use that information:

<b>Context</b>	<b>Types of Information (Examples)</b>	<b>Primary Purpose for Collection and Use</b>
<b>Account Registration</b>	We collect your name, telephone number, e-mail address, physical address, and other identification information when you create an account.	To administer your account and communicate with you about your account.
<b>Inquiries, Comments, and Feedback</b>	If you contact us we collect your name and e-mail address, as well as any other content that you send to us.	To respond to or follow-up on your comments, feedback, inquiries and other requests.
<b>Mailing Lists</b>	When you subscribe to receive communications, we collect your name, e-mail address and/or physical address.	To communicate with you regarding products, surveys, questionnaires, and studies.
<b>Surveys/Questionnaires</b>	When you participate in a survey or questionnaire, we collect demographic information such as age and income range, gender, ethnicity, education, household size and marital status, as well as any other information that you provide through the survey or questionnaire. If the survey or questionnaire is provided by a third party service provider, the third party’s privacy policy applies to the collection, use, and disclosure of your information.	To gather feedback regarding products and concepts, to understand how you use and interact with those products and concepts, and to use for marketing and research purposes.
<b>Studies</b>	When you participate in a study, we collect your feedback and information about your experience during the study, including but not limited to written responses, pictures, oral statements, videos, and images.	To gather feedback regarding products and concepts, to understand how you use and interact with those products and concepts, and to use for marketing and research purposes.

**Information from Other Sources.** In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, publicly available sources, or social networks in which you participate.

### **Use And Processing Of Information**

In addition to the purposes and uses described above, we use information in the following ways:

- to request feedback on products or participation in on-line surveys;
- to verify your identity;
- to complete transactions you have requested;
- to conduct studies, research, and analysis related to products or concepts;
- to improve products or services and tailor them to your usage or preferences;
- to communicate with you about your account; and
- for internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

### **Sharing Of Information**

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

- 1. Sponsoring Company.** We share information with the company or entity sponsoring the study or research.
- 2. Affiliates and Acquisitions.** We share information with our corporate affiliates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
- 3. Business Partners.** We share your information with business partners, such as service providers, vendors, and retail partners (and their service providers). Among other things, business partners may help us to administer our website, assist or support our business operations, conduct surveys, provide technical support, conduct research and analysis, process transactions, and fulfillment.
- 4. Legal Process.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, to comply with relevant laws, or to respond to requests from public and government authorities. We may also share your information in order to enforce our terms and conditions, to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, to protect our operations or those of any of our affiliates, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.

### **Your Choices**

You can make the following choices regarding your personal information:

- 1. Access To Your Personal Information.** You may request more information about the personal information that we have about you, or a copy of that information, by following the instructions described in the Contact Information section below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you.

- 2. Changes To Your Personal Information.** We rely on you to update and correct your personal information. Most of our websites allow you to modify or delete your account profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information, contact us by following the instructions described in the Contact Information section below.
- 3. Deletion Of Your Personal Information.** Typically we retain your personal information for the period necessary to fulfill the purposes for which it was obtained, unless a longer retention period is required or permitted by law. You may, however, request that we delete your personal information by following the instructions described in the Contact Information section below. If required by law we will grant a request to delete information, but you should note that in certain situations, and to the extent permitted by law, we may keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, complete transactions, provide requested goods or services, identify or repair errors, or prevent inadvertent discrimination against those who exercise their privacy rights. We may also keep your information in order to use it in a manner that is aligned with the reasonable expectations of individuals or is compatible with the context in which it was provided to us.
- 4. Objection to Certain Processing.** In some circumstances, you may object to our use of your personal information by following the instructions described in the Contact Information section below.
- 5. Do No Track Feature.** While some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and we are not currently set up to recognize or respond to these automated browser signals regarding tracking mechanisms.
- 6. Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send promotional materials to you, such as invitations to join future studies or participate in surveys. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
- 7. Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line along with your name, address and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
- 8. Revocation Of Consent.** If you revoke your consent for the processing of personal information then we may no longer be able to participate in studies or research. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us as described in the Contact Information section below.

Please note that to protect your information we must be able to verify your identity before we can process your request to exercise any of the foregoing privacy rights. We may conduct the verification process by email or phone, and we will ask you to provide information such as your name, contact information, and any additional relevant information based on your relationship with us.

In some circumstances, certain individuals may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us. Note that we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

**How We Protect Personal Information**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

**Other Important Information**

The following additional information relates to our privacy practices:

- **Third-Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own. Any personal information that you provide through third party websites, applications or other means will be governed by the privacy policies applicable to those third parties and mediums.
- **Changes To This Privacy Policy.** We may update our Privacy Policy from time to time to reflect changes to our practices, technology, legal requirements and other factors. When changes are made to this Privacy Policy they will become immediately effective when published. You can check the "Last Updated" legend at the bottom of this page to see when this Privacy Policy was last updated.
- **Information for California Residents.** California law indicates that organizations should disclose whether certain categories of information are collected, made available to third parties in exchange for valuable consideration ("sold"), or disclosed for an organization's "business purpose" (as those terms are defined under California law). You can find a list of the categories of information that we collected and how we share the information below. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below. We do not discriminate against California consumers who exercise any of their rights described in this policy.

Category of Personal Information	Collected	Sold	Disclosed for a Business Purpose	Examples of Categories of Third Parties that Receive Personal Information
<b>Identifiers</b>				
Real name and/or alias	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>• The company or entity sponsoring the study or research</li> <li>• Third parties that help administer, manage and analyze our</li> </ul>

Contact information (such as postal address, telephone number, e-mail address)	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>programs and services, such as customer service providers, product review hosts, and survey administrators.</li> <li>• Third parties necessary to complete transactions and provide our products and services, including order management and fulfillment providers, deliver companies, agents, and manufacturers.</li> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, data centers/hosts/cloud service providers.</li> <li>• Third parties that assist us with fraud prevention, detection, and mitigation.</li> <li>• Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law, including litigation.</li> </ul>
Online identifiers (such as internet protocol address, etc.)	✓	<input type="checkbox"/>	✓	
Identification documents (e.g., driver's license or similar ID)	✓	<input type="checkbox"/>	✓	
Physical characteristics	✓	<input type="checkbox"/>	✓	
Signature	✓	<input type="checkbox"/>	✓	
<b>Medical / health insurance information</b>				
Information regarding an individual's medical history, mental or physical condition, or treatment	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>• The company or entity sponsoring the study or research</li> <li>• Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> </ul>
Health insurance policy number, subscriber identification number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Protected characteristics</b>				
Age, Race, Ethnicity, Gender, Physical or Mental Handicap, etc.	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>• The company or entity sponsoring the study or research</li> <li>• Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> </ul>
<b>Commercial information</b>				
Information about products and services obtained from us	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>• The company or entity sponsoring the study or research</li> <li>• Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> <li>• Third parties necessary to complete transactions and provide our products and services, including order management and fulfillment providers, deliver companies, agents, and manufacturers.</li> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, data centers/hosts/cloud service providers.</li> </ul>
Individual's preferences	✓	<input type="checkbox"/>	✓	
Other consuming histories or tendencies	✓	<input type="checkbox"/>	✓	
<b>Network activity data</b>				
Browsing and/or search history	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>• The company or entity sponsoring the study or research</li> <li>• Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> <li>• Third parties necessary to complete transactions and provide our products and services, including order management and fulfillment providers, deliver companies, agents, and manufacturers.</li> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, data centers/hosts/cloud service providers.</li> </ul>
Information about interactions with our website, mobile application, or advertisements	✓	<input type="checkbox"/>	✓	
<b>Electronic and sensory data (i.e., audio, electronic, visual, thermal, olfactory, or similar information)</b>				
Audio recording (e.g., survey recordings)	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>• The company or entity sponsoring the study or research</li> <li>• Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> <li>• Third parties necessary to complete transactions and provide our products and services, including order management and</li> </ul>

Photographs	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>fulfillment providers, deliver companies, agents, and manufacturers.</li> <li>Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, data centers/hosts/cloud service providers.</li> <li>Third parties that assist us with fraud prevention, detection, and mitigation.</li> <li>Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law, including litigation.</li> </ul>
Video recording	✓	<input type="checkbox"/>	✓	
<b>Professional/employment information</b>				
Education	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>The company or entity sponsoring the study or research</li> <li>Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> <li>Third parties necessary to complete transactions and provide our products and services, including order management and fulfillment providers, deliver companies, agents, and manufacturers.</li> <li>Third parties that assist us with fraud prevention, detection, and mitigation.</li> <li>Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law, including litigation.</li> </ul>
Occupation	✓	<input type="checkbox"/>	✓	
Employment history	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Professional references	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Inferences drawn from any of the above information</b>	✓	<input type="checkbox"/>	✓	<ul style="list-style-type: none"> <li>The company or entity sponsoring the study or research</li> <li>Third parties that help administer, manage and analyze our programs and services, such as customer service providers, product review hosts, and survey administrators.</li> <li>Third parties necessary to complete transactions and provide our products and services, including order management and fulfillment providers, deliver companies, agents, and manufacturers.</li> <li>Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, data centers/hosts/cloud service providers.</li> </ul>

**Contact Information.** If you have any questions, comments, or complaints concerning our privacy practices, or would like to exercise any applicable privacy rights, please contact us at the appropriate address below.

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