

Cultivated Synergy Privacy Policy

We care about your privacy and this privacy policy (our “Policy”) describes how Cultivated Synergy, LLC. (Referred to collectively as “Us” or “We” in this Policy) may collect information from you, how we use it, and with which parties it may be shared. Please read this policy carefully. If you do not agree with this Policy, please do not provide any information to us. By accessing or using this Website or any App (each as defined below) or by otherwise providing information to use in any of the ways covered by this Policy, you are agreeing to the current terms of this Policy. Please check the policy periodically for updates.

Personal Information. “Personal Information” is data that relates to you and can — either on its own or in combination with other information — identify you as an individual. Personal Information does not include data that has been aggregated or made anonymous such that you can no longer be identified using any means reasonably available to us.

Our Services. The Services referenced in this Policy include the Services provided by Cultivated Synergy.

References to “you.” In this Policy, “you” means anyone who uses our Services, websites, or applications. If you are an Employee or Applicant that uses our Services, this Policy explains how we use Personal Information in the context of your use of our Services.

WHAT’S COVERED?

This Policy covers all information provided by you to us using one of the following methods (each a “Covered Method”):

- Visit or use any websites owned or operated by or on behalf of Cultivated Synergy, LLC., including www.cultivatedsynergy.com (our “Websites”);
- Provide information to use via email, text, or electronic communications, such as filling out forms on one of our Websites (“Submitted Forms”).
- Install and use any of the software applications that we may develop for use on tablets or mobile devices (each an “App”);
- Information that you post or upload to one of our pages on a social media site, including tweets, images, user-generated content, Personal Information, digital sounds, and pictures (“Social Information”)
- Interact with our advertising or applications that we serve on third-party websites and services (“Served Ads”)

This Policy does not apply to information collected any way other than via a Covered Method (including as a result of you using or clicking on any application or content that may link to or be

accessible from or on the Website (“Linked Sites”) or any advertising displayed on one of our Websites that is provided by anyone other than us (“Third Party Ads”).

Any time that you use one of our Websites or Apps, provide information via a Submitted Form or click on or interact with a Served Ad, we will likely collect some types of information from you as a result of that action. Depending on the action you take, we may collect any of the following types of information:

- personally identifiable information (“PII”) that you provide to us;
- certain types of financial and payment information to complete transactions with us, including to pay registration fees or tuition fees (“Financial Information”);
- information that relates directly to you other than your PII that you provide to us such as records and copies of your correspondence, responses to surveys, details of transactions you carry out, interactions with our students, and search queries on the Websites (“Volunteered Information”);
- certain information that we automatically collect as you navigate through the Site or use an App about your equipment, devices and browsers, and your use of our Websites and Apps (“Usage Information”); and
- Information that is provided to us from third parties, for example, our business partners (“Third Party Information”).

Following is a more detailed description of each of these types of information:

PII.

When you use our Websites or Apps, we may ask you to provide the following PII:

- First, middle and last name, previous names
- E-mail address
- Gender
- Date of birth
- Mailing address
- Organization name
- Valid day or evening telephone number
- Cell , Work, and/or Home phone number

VOLUNTEERED INFORMATION.

First, you may correspond with us directly, answer surveys on our Websites, or provide us with unsolicited information. Except for PII or Financial Information, we do not assume any obligation of confidentiality or nondisclosure for Volunteered Information. You should be selective about the information you choose to disclose as Volunteered Information.

Second, certain of our Websites or Apps may permit you to communicate with other users or post certain content or comments to public forums that can be viewed by other users. Anything that you post in these areas is public and not protected. You should not post any PII or Financial Information to any public forum. We cannot control the actions of other users of the Websites

and do not guarantee that Volunteered Information will not be viewed by unauthorized persons or competitors.

USAGE INFORMATION.

When you use our Websites or Apps, we may use certain technologies to automatically collect certain Usage Information, including:

- IP address
- Operating system
- Browser type
- Collection date
- Day of week, time of day (hour)
- Language settings
- Country, state, designated market area (DMA), city (relating to IP address, if available)
- Domain (.com, .net, .mil, .org, .edu, etc.)
- Web pages viewed
- Email clicks or other actions taken
- Logs
- Logos

We also may use certain technologies, such as cookies, to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking) for the purpose of using such data to deliver advertising that is based on your web-viewing behaviors. Using cookies also helps us to improve our Website and to deliver a better and more personalized service, including enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Websites according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Websites.

We may use the following types of cookies:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Websites.
- Flash Cookies. Certain features of our Websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Websites. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and

security settings for Flash cookies, see Choices about How We Use and Disclose Your Information.

- Web Beacons. Pages of our Websites and our emails may contain small electronic files known as Web Beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). In using behavioral tracking, we follow the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance (a coalition of marketing, online advertising, and consumer advocacy organizations).
- We do not associate your interaction with unaffiliated sites with your Personal Information in providing you with interest-based ads.
- We do not provide any Personal Information to advertisers or to third party sites that display our interest-based ads.
- We may use information provided about you by third parties (such as the sites where you have been shown ads or demographic information) that we may use to provide you more relevant and useful advertising.

HOW WE USE YOUR INFORMATION.

We use information that we collect about you or that you provide to us, including any Personal Information:

- to present our Websites and Apps to you;
- to contact you regarding your status with Cultivated Synergy, LLC.;
- to provide requested products and services;
- to respond to your inquiries and provide customer support;
- to administer promotions in which you have indicated an interest;
- for our internal marketing purposes, which include, but are not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you;
- for investigation of information security and information asset protection-related incidents;
- to test, correct and improve our content, applications and services;
- to develop new applications, products and services;
- for behavioral tracking purposes;
- to prevent potentially illegal activities (including illegal downloading of copyrighted materials in accordance with our Copyright Infringement policy);
- to obtain or collect payment;
- to provide you with information concerning arrangements and other options for the repayment of funds loaned to you for your education;
- to maintain educational and business records for reasonable periods;
- to enforce our Terms of Use;

- in connection with the contemplated or actual reorganization, merger, acquisition, financing, securitization, insuring, sale or other disposal of all or part of our business or assets;
- for any other purpose for which you provide it;
- to notify you about changes to our Websites or Apps or any products or services we offer or provide through it;
- to allow you to participate in interactive features on our Websites;
- as may be required or permitted by legal, regulatory, industry self-regulatory, insurance, audit or security requirements applicable to us;
- in any other way we may describe when you provide the information; and for any other purpose with your consent.

WHEN WOULD WE DISCLOSE YOUR INFORMATION.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Information:

- for any of the purposes listed above for which we may use your Personal Information;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provided the information;
- with your consent;
- to comply with any court order, law or legal process, including to respond to any government or regulatory request; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Cultivated Synergy, LLC., our customers or others.

OPTIONS FOR MANAGING YOUR INFORMATION.

You can review and change your Personal Information by logging into the Websites and visiting your Cultivated Synergy personal account profile page. You may also send an email to contact@cultivatedsynergy.com to request access to, correct or delete any Personal Information that you have provided to us. We cannot delete your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. Even if you delete your Volunteered Information, anything that was posted to a public forum may remain viewable in cached and archived pages, or might have been copied or stored by other Websites users. If you do not wish to receive marketing email communications from us, you may express your choice where indicated on the applicable e-mail or other communication.

WHO THIS INFORMATION IS INTENDED FOR.

Our Websites and Apps are not intended for children under 18 years of age. If you are under 18, do not use or provide any information via a Website or App, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

WHAT WE RECORD OR MONITOR.

We may monitor, record, and retain all incoming and outgoing communications, including emails and phone calls for training and for quality assurance purposes. By electing to call or email us, you agree that your call may be recorded or your email may be retained. We only retain recordings and records for as long as necessary to adequately discharge the legitimate business purpose related to the call or email purposes, unless a specific communication needs to be retained for legal reasons.

HOW WE PROTECT YOUR INFORMATION.

We take commercially reasonable precautions and have implemented commercially reasonable technical measures intended to protect against the risks of unauthorized access to, erroneous disclosure of, and unlawful interception of Personal Information submitted via the Website. However, your e-mail transmissions and/or other communications containing Personal Information may be unlawfully intercepted or accessed by third parties and/or the Website may be subject to hostile network attacks or administrative errors. We cannot and do not guarantee the security of any information transmitted over the Internet. Once we receive your Personal Information, we take steps that we believe are commercially reasonable to limit access to your Personal Information to only those employees and service providers whom we determine need access to the Personal Information to provide the requested products, services, offers or opportunities that may be of interest to you. However, even after we receive your Personal Information, we cannot guarantee that your Personal Information may not be accessed, disclosed, altered, or destroyed as a result of a breach of our commercially reasonable efforts or as a result of any other event beyond our reasonable control. Accordingly, we cannot and do not guarantee that your Personal Information is completely secure and safe from such risks.

FOR THE AVOIDANCE OF DOUBT, EXCEPT AS REQUIRED BY APPLICABLE LAW OR THE PCI STANDARDS, WE EXPRESSLY DISCLAIM ANY REPRESENTATION OR WARRANTY, WHETHER EXPRESS OR IMPLIED, WITH RESPECT TO ENSURING, GUARANTEEING OR OTHERWISE OFFERING ANY DEFINITIVE PROMISE OF SECURITY IN CONNECTION WITH YOUR PERSONAL INFORMATION OR USAGE INFORMATION.

INTERNATIONAL TRANSFERS.

Our Services are headquartered in the United States. Please be aware that information you provide to us or that we obtain from your use of our Service may be collected in your country and subsequently transferred to another country in accordance with applicable law. By using our service, you consent to the collection, international transfer, storage and processing of your information.

POLICY CHANGES.

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website's home page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Websites and this privacy policy to check for any changes.