Privacy Policy

Last Updated: March 1, 2023

This Privacy Policy covers EasyLlama ("EasyLlama," "we," "us," "our") policies on the collection, use, and disclosure of personal information and data (as defined by applicable law, including, but not limited to, the California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq ("CCPA") and the Virginia Consumer Data Protection Act of 2021, as amended, VA Code Title 59.1 a chapter numbered 52, consisting of sections numbered 59.1-571 through 59.1-581 ("VCDPA") (collectively referred to as "Personal Information") when visitors and customers (collectively "Users") access, use, or otherwise interact with www.easyllama.com   and/or EasyLlama's related mobile applications (collectively the "Platform") and the software and services made available through the Platform (collectively the "Services").

EasyLlama is a Delaware corporation with offices in the United States. EasyLlama collects Personal Information and processes, transfers and stores data within the United States. By optionally providing your Personal Information within the Platform, you consent to the collection, use and disclosure practices identified in this Privacy Policy. Users may withdraw your consent at any time through the by email at privacy@easyllama.com

1. **Information Collected by EasyLlama**

   - **Email & Contact Information.**   Users may optionally provide their email address and/or other contact information (e.g., name, company name, job title) to EasyLlama to contact us through the Platform with questions about our Platform and Services. Users may also optionally subscribe to our newsletters and may unsubscribe at any time through the opt-out link contained within those communications.

   - **Account Information.** In subscribing to, or otherwise purchasing, the Services, EasyLlama requires its customers to provide account-based information, including Customer name, address, phone number, and email. Administrators who assign courses to authorized users will be required to input (manually or through available integrations) the name, email, state and phone number, as well as applicable employment information (office location, supervisor, department, applicable employee ID) to enable assignment and completion status tracking of course licenses. This information is necessary to facilitate account services.   EasyLlama will utilize email and/or cellular phone numbers provided to communicate with authorized users regarding course assignment, access and completion status. Account information may also be used to (i) provide information regarding our Services; (ii) communicate material changes to our Terms of Service and Privacy Policy; and/or (iii) help us maintain and improve Services offered.

- **Payment Information.** To make payments for the Services, EasyLlama may collect ACH, debit or credit card account information, email and other information to verify the customer's identity, such as name, address, telephone number, and/or date of birth. EasyLlama does not itself store ACH, debit or credit card information on its servers, but utilizes a third party payment processors to manage and process payments in order to guarantee the security of personal payment information.

- **IP Address.** A user's "IP Address" is identified and logged automatically in our server log files whenever you visit the Platform, along with the time of the visit and the page(s) that were visited. EasyLlama uses IP Addresses for calculating usage levels of the Platform, helping diagnose server problems, and administering the Platform and Services.

- **Web Beacons.** Pages of our Site and/or emails form EasyLlama may contain small electronic files known as web beacons that permit EasyLlama, for example, to count users who have visited those pages or opened an email and for other related Site statistics.

- **Cookies.** EasyLlama's Site uses cookies to provide users with a better browsing experience -- cookies are only collected with your express consent. In addition, by accepting EasyLlama's Privacy Policy upon purchase of the Services, you are consenting to EasyLlama's use of cookies in connection with the Services itself. EasyLlama utilizes cookie technology to gather information on Internet use in order to serve you more effectively. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and transferred to your device. You can set your browser to remove or reject cookies; however some Platform features or Services may not work properly without cookies.

  How You Can Control Advertising Cookies. Cookies are also utilized to deliver advertising on our site. Among other uses, they allow us to show more relevant advertising to people who visit the site by showing you ads that are based on your browsing patterns and the way you have interacted with our sites. You can find information about how to opt out of the cookies provided by our advertising partners here:

  - **Google Ads.**   Google Ads utilizes search engine marketing to serve ads to target audiences. Users can manage ad settings on <u>Google Advertising Opt-Out</u> and revisit their privacy preferences on Google's Privacy Checkup tool.

  - **Facebook Advertising.** Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information and use that information to provide measurement services and target ads. EasyLlama may use "Visitor action pixels" from Facebook on the Platform. This allows user behavior to be tracked after they have been redirected to the provider's website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the Personal Information of individual users. Please see the <u>Facebook's Data Policy</u> for additional information. Users can opt-out of the collection and use of information for ad targeting. To opt-out, go to Privacy Settings through your Facebook account and opt out under the Ad Preferences settings.

○ **Microsoft Ads.** In connection with Microsoft Ads and remarketing, EasyLlama uses a Universal Event Tracking (UET) feature, which enables Microsoft to collect or receives Personal Information from you to provide Microsoft Advertising. Please see Microsoft Privacy Statements for more information.

Even if you opt out of cookies/ads personalization, you may still see ads based on factors such as your general location derived from your IP address, your browser type, and your search terms. You can also manage cookies for any online advertising service via the consumer choice tools created under self-regulation programs, such as the US-based aboutads.info choices page or the European Union ("EU")-based Your Online Choices. See also the Network Advertising Consumer Opt-Out and/or the Digital Advertising Alliance Opt-Out.

2. **Personal Information Received by EasyLlama or Disclosed or Shared by EasyLlama**

Personal Information is collected to facilitate the Services offered, for marketing of our Services and products, or for internal analysis relating to product improvements and data security. EasyLlama shares Personal Information with only those contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Information confidential and to limit such use only for the purpose for which it is disclosed. Personal Information collected is processed by the following service providers to facilitate provision of the Services on the Platform or as otherwise disclosed at the time of collection to:

Provide Services. Personal Information is used to:
- Provide, operate and improve the Platform and Services;

- Process payments and complete transactions;

- Update you and provide marketing communications about new features and services, to send survey requests to help improve our products and services;
- Respond to inquiries and provide customer support and feedback;
- Detecting, preventing, and investigating security incidents that compromise the availability, authenticity, integrity or confidentiality of stored or transmitted personal information;
- Protecting against malicious, deceptive, fraudulent or illegal activity directed at EasyLlama;
- Debugging to identify and repair errors that impair existing intended functionality.
- Analyze data to assess, understand and improve the services and personalize user experiences, including creation of anonymized aggregated, statistical and benchmark data. Aggregated data is utilized to help develop and market products or services and present targeted content and advertising
- Enable functionality of the services to authenticate a user, prevent fraud, and implement security measures
- Undertaking activities to verify or maintain the quality of a service or product that is developed or provided, and to improve, upgrade, or enhance any service or product that is developed or provided by EasyLlama.

Share with Service Providers. EasyLlama has engaged with third party service providers to facilitate the EasyLlama services and operate our business, including without limitation, data base management hosting, information technology, email/SMS delivery, customer support, analytics, data security and compliance services necessary to provide the Services. For each service provider, EasyLlama will have in place written contracts that describes the purpose of the service and disclosure of Personal Information, and requires the service provider to both keep the Personal Information confidential and not use it for any purpose except performing the services pursuant to such contract.

SMS Notifications – Notice & Consent. EasyLlama utilizes a third party service provider to enable SMS course assignment and status notifications to its customers and its authorized users (as defined in the applicable Terms of Service or Services Agreement). You consent to receive recurring text messages about the EasyLlama assigned e-learning courses and your account to the mobile number associated with assigned EasyLlama courses. You understand and agree that text messages sent to your mobile number may be generated using automated technology, Message and data rates may apply. Reply STOP to opt-out or HELP for info. Consent is not a condition of any purchase.

Analytics: EasyLlama uses the following third party analytics services:

- **Google Analytics**: EasyLlama utilizes Google Analytics for data analytics to generate insights and recommendations. For more information please see Google's Privacy Policy. However, if you do not want your Personal Information to be used by Google Analytics, you may opt-out by installing Google Analytics Opt-out Browser Add-on.
- **HubSpot.** EasyLlama utilizes HubSpot to measure the performance of its marketing campaigns. Please see HubSpot's Privacy Policy for more information on their data collection and use practices.
- **Hotjar**. In addition to analytics, Hotjar may also use other technologies with similar functionality to cookies, such as web beacons and tracking URLs to obtain Log Data about users. It may also use web beacons and tracking URLs in our messages to you to determine whether you have opened a certain message or accessed a certain link. Hotjar collects information in accordance with its Hotjar Privacy Policy. To disable Hotjar so that it does not collect your data, follow the instructions on Hotjar's Opt-Out Page.

Compliance and Protection. Personal Information may be disclosed to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) if EasyLlama is involved in a merger, acquisition, or sale of all or a portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify you about law enforcement or court ordered requests for data unless otherwise prohibited by law.

3. **Personal Information of Minors**

EasyLlama does not knowingly collect Personal Information from anyone under the age of 16. If we learn we have collected or received Personal Information from anyone under the age of 16 without verification of parental consent, we will delete that information. If a parent or guardian becomes aware that his or her child under the age of 16 has provided EasyLlama with Personal Information without their consent, he or she should contact EasyLlama at legal@easyllama.com. EasyLlama will delete such Personal Information from our files within a commercially reasonable time, but no later than required under the applicable law.

4. **Retention and Deletion of Personal Information; De-Identified Data**

Unless erasure is otherwise requested under applicable law or as otherwise stated in this Privacy Policy, EasyLlama will retain account data as long as it is necessary to provide services to our customers. Personal Information obtained from Platform visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a visitor exercises the right to opt-out of requested communications or information-based services. Anonymized and pseudo-anonymized data will be retained as long as EasyLlama determines such data is commercially necessary for its legitimate business interests.

To the extent EasyLlama de-identifies any Personal Information, EasyLlama shall maintain and use such de-identified data without attempting to re-identify the data.

5. **EasyLlama's Security Practices.**

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration. However, although we endeavor to provide reasonable security for Personal Information we process and maintain, no security system can ever be 100% secure.

6. **Response To "Do Not Track" Signals**

Do Not Track" is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-website user tracking.

EasyLlama shall treat any user-enabled global privacy controls, such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicate or signal the consumer's choice to opt-out of the sale of their Personal Information as a valid request submitted pursuant to the CCPA for that browser or device, or, if known, for the consumer.

7. **Changes to this Privacy Policy**

If we make material changes to our Privacy Policy, we will notify you by (i) changing the Effective Date at the top of the Privacy Policy, *or* (ii) sending an electronic notification to all active account holders, *or* (iii) adding a banner/notification to the Site itself.

8. **Supplemental U.S. State-Specific Notices**

This supplemental notice sets forth the disclosures and rights applicable to residents of California, Colorado, Virginia, Connecticut, and Utah. Such consumer privacy notices and rights shall also apply to other state residents to the extent other state consumer privacy laws are implemented following the last effective update to this Privacy Policy.

EasyLlama collects, uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed in Preceding 12 Months				
Categories of Personal Information Collected	**Source of Collection**	**Purpose of Use**	**Categories to Whom EasyLlama Disclosed Personal Information**	**Purpose of Disclosure**
Name/Alias	Customer	Account Creation; Account Verification; Payment Processing; Support and Services Requests; Perform Services	Yes; Service Provider	Provide Services; Auditing; Analytics; Security; Payment Processing
Email	Customers; Visitors	Account Creation; Account Verification; Payment Processing; Support and Services Requests; Perform Services	Yes; Service Provider	Provide Services; Auditing; Analytics; Security; Payment Processing
Address	Customer	Account Creation; Account Verification; Payment Processing; Support and Services Requests; Perform Services	Yes; Service Provider	Provide Services; Auditing; Analytics; Security; Payment Processing
Cell or Telephone #	Customer	Support and Services Requests; Perform Services	Yes; Service Provider	Support and Services Requests; Perform Services;

Unique/Online ID (cookies)	Device	Perform Services; Marketing; Auditing; Analytics	Yes; Service Provider	Perform Services; Marketing; Auditing; Analytics
IP Address	Device	Perform Services; Marketing; Auditing; Analytics	Yes; Service Provider	Perform Services; Marketing; Auditing; Analytics
Credit or Debit Card # /ACH	Customer	Payment Processing *token only	Yes; Service Provider	Payment Processing *token only

EasyLlama does not retain a consumer's Personal Information for longer than is reasonably necessary for each disclosed purpose.

Other Potential Third Party Disclosures: Personal Information may also be disclosed to serve our legitimate business interests as follows: (a) as required by law, such as to comply with a subpoena, or similar legal process, (b) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (c) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (d) enforce our agreements with you, and/or (e) investigate and defend ourselves against any third-party claims or allegations.

A. **Sale of Personal Information; Sharing of Personal Information; Right to Opt-Out**

EasyLlama does not and will not sell your Personal Information. However, under the CCPA, some sharing of personal information necessary to provide you with personalized ads may be considered a "sale," even if no money is exchanged.

EasyLlama does not share Personal Information with third parties for cross-context behavioral advertising purposes.

To the extent EasyLlama is regarded as "selling" your personal information (as the term "sell" is defined under the CCPA), you have the right to opt-out of that "sale" on a going-forward basis at any time. Certain state residents have a right to opt-out from the "sale" or "sharing" of your personal information with third parties who are not our service providers (as those terms are defined by applicable laws) and/or to opt out of cross-context behavioral advertising. To exercise this right, click the <u>Do Not Sell or Share My Personal Information</u> link on the bottom of the Platform page where your information is being collected or go to your account settings. You can also submit a request to opt-out by emailing us at <u>legal@easyllama.com</u> with the subject line "Do Not Sell or Share." Finally, if your browser supports it, you can turn on the <u>Global Privacy Control</u> to opt-out of the "sale" or "sharing" of your personal information.

B. **Collection of Sensitive Information**

EasyLlama does not collect Sensitive Information

C. **Consumer Rights.**   Consumers may contact EasyLlama to exercise the following consumer rights:

1. **Request EasyLlama Disclose At No Charge ("Right to Know"):**

- Specific pieces of personal information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected;
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared; and

Right to Know Requests can be submitted to EasyLlama by email at legal@easyllama.com.

2. **Request EasyLlama to Delete At No Charge ("Right to Delete"):**

Deletion Requests can be submitted to EasyLlama be email at legal@easyllama.com or by mail to EasyLlama at: EasyLlama, Inc., Attention: Privacy Request to Delete, 440 N Barranca Ave #3753
Covina, CA 91723 or by email at: legal@easyllama.com.

D. **Request EasyLlama Correct At No Charge ("Right to Correct"):**

Requests that EasyLlama correct any inaccurate Personal Information collected by EasyLlama can be submitted by email to legal@easyllama.com

E. **Verified Request Process**

EasyLlama will verify all consumer requests prior to taking any action in response to such request. For consumers that maintain an account with EASYLLAMA, it may verify the identity of the consumer making the request by either matching information with the account information on file or through existing account authentication credentials.

Under   applicable state law, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. EasyLlama may additionally require the consumer to confirm their identity and verify the authorized agent's permission before complying with any request.

F. **Consumer Request Limitations**

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the applicable state laws, including, but not limited to:

- EasyLlama is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.
- Deletion is not required if it is necessary for EasyLlama to maintain the Personal Information to fulfill applicable permissible purposes enumerated pursuant to applicable state consumer privacy laws.

EasyLlama will confirm and respond to all requests within the timeframe required under applicable state law. In responding to any request to disclose/delete, EasyLlama shall maintain a record of the requests as required under applicable state law.

G. Non-Discrimination Policy

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA and VCDPA. EasyLlama shall not discriminate against a consumer for exercising any statutory consumer privacy rights, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to EasyLlama for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services, or (d) providing a different level of quality of goods/ services.

EasyLlama employees, applicants and independent contractors have the right not to be retaliated against for the exercise of their CCPA rights.

H. Your Virginia Privacy Rights under VCDPA

If EasyLlama is unable to process requests relating to your Personal Information and denies your request, Virginia residents have the right to appeal by emailing EasyLlama at legal@easyllama.com. EasyLlama will respond to your appeal request within 60 days of receiving the request to appeal.

I. Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581

California law permits Consumers to request and obtain from EasyLlama once a year, free of charge, certain information about their Personally Identifiable Information ("PII") (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

J. Accessibility of this Policy.

- You can download and print a copy of this Notice here

K. Contact Us

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: EasyLlama, Inc., Attention: Privacy Department, 440 N Barranca Ave #3753, Covina, CA 91723 or by email at: legal@easyllama.com.

9. **Applicable EU GDPR Notices**

Data Processor. EasyLlama is the processor of all Customer Data (as defined in the applicable Terms of Service), including Personal Information input by a Customer, and its Authorized Users, in connection with a Customer's use of the EasyLlama Services. You may contact EasyLlama at Attention: Privacy Department, 440 N Barranca Ave #3753, Covina, CA 91723 or at legal@easyllama.com

For applicable EU Users, we will only collect and process Personal Information about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you, and "legitimate interests." Where we rely on your consent to process Personal Information, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your Personal Information, please submit a request through email EasyLlama at legal@easyllama.com

When we transfer Personal Information of individuals from the European Economic Area ("EEA"), Switzerland or the United Kingdom ("UK"), we will enter into a Data Processing Agreement with customers incorporating current Standard Contractual Clauses and the UK Addendum. We also implement additional safeguards where appropriate, such as commercial industry standard secure encryption methods to protect customer data at rest and in transit and other appropriate contractual and organizational measures to ensure the confidentiality, integrity and security of a customer's Personal Information.

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

How to Review, Transfer, Restrict the Use of or Request Erasure of Personal Information

   IF YOU WOULD LIKE TO:

- Access, review, restrict processing of, or otherwise request erasure of your Personal Information;
- Obtain the identity of the source of any Personal Information collected;
- Request correction of any errors contained within your Personal Information;
- Request EasyLlama transfer your Personal Information to another service provider;
- Object to the manner in which your Personal Information is processed;
- Lodge a complaint with an EU supervisory authority; or
- Withdraw consent to the collection of your Personal Information

Requests under this Section can be made through email at legal@easyllama.com**.** We will respond in the timeframes required under applicable law. For all requests made pursuant to this section, EasyLlama will (a) respond as required under applicable law, (b) provide a copy of any requested Personal Information in a structured, commonly used and machine-readable format, and/or (c) transmit such Personal Information to another service provider without restriction in accordance with applicable law

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