

# APERIAN GLOBAL® PRIVACY POLICY

Last updated: 14 August 2023

Updates reflect and reference the new EU - US Data Privacy Framework, replacing references to Privacy Shield.

Previous versions:

[September 2022](#)

[February 2022](#)

We recommend that you read this Privacy Policy in full to ensure you are fully informed. However, to make it easier for you to review those parts of this Privacy Policy which apply or are relevant to you at any given moment in time, we have divided up the document into the following sections:

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## 1. Who we are

Aperian Global, Inc. and its subsidiaries and affiliated companies (collectively "Aperian Global," "our," "we," or "us") are committed to protecting the privacy of individuals who interact with us, such as our website visitors, customers, business partners, leads and prospects, recipients of marketing communications, end users and event attendees ("you" and "your").

Aperian Global is an international consultancy that provides leading diversity & inclusion, cultural competence, and global mobility solutions. Aperian Global is headquartered in the United States with offices throughout North America, Europe and Asia Pacific. Aperian Global, Inc. is a Massachusetts corporation with a principal place of business at 414 Fayetteville Street, 4th Floor, Raleigh, NC 27601, USA.

GlobeSmart® is Aperian Global's online learning platform that promotes global collaboration and inclusion. GlobeSmart provides an analytics-driven solution that helps bridge work-style, communication, and cultural differences. We guide teams towards inclusive organizational culture, productive global projects, and stronger client relationships. Aperian Global mostly sells its products and services to corporations and business customers. However, we also sell some services to consumers directly through our GlobeSmart platform.

If you reside or are located in the European Economic Area ("EEA"), the United Kingdom or Switzerland, Aperian Global is the data controller of your personal information described in this Policy.

## 2. Scope of this Privacy Policy

This privacy policy ("Policy") explains how we collect, use and share your personal information when you:

- visit, interact with or use our websites including <https://www.aperianglobal.com>, <https://gslearning.aperianglobal.com>, <https://globesmart.aperianglobal.com> and <https://www.globesmart.com> ("Sites"), social media pages, public forums, blogs, online advertisements, marketing, or sales communications;
- directly purchase or use our products and services, including via our GlobeSmart platform;
- visit, interact with or use any of our offices, events, sales, marketing, and other offline activities; and/or
- submit a job application to Aperian Global.

When we refer to any combination of the above, we use the term "Services".

### ***This Policy does not apply to:***

- websites, products, or services that display or link to different privacy statements or that are operated by companies other than Aperian Global, or to business activities or practices of third parties; or
- the extent we process personal information in the role of a data processor on behalf of our business customers. For detailed privacy information about where an Aperian Global business customer or a customer affiliate who uses the services is the data controller, please reach out to the respective business customer directly. We are not

responsible for the privacy or data security practices of our business customers, which may differ from those set forth in this Policy.

**When you access or use our Services, you acknowledge that you have read this Policy and understand its contents.** If you do not understand any aspects of our Privacy Policy, or if you have questions or complaints, please feel free to contact us at [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com). Your use of our Site is governed by this Policy and our [Terms of Use](https://globesmart.aperianglobal.com/content/terms-of-use) (<https://globesmart.aperianglobal.com/content/terms-of-use>).

### 3. Personal information collected

The personal information we collect depends on the context of your interactions with Aperian Global and the choices you make, the Services and features you use, your location, and applicable laws, which in the preceding 12 months included:

#### ***Information provided directly by you***

We collect personal information that you provide to us including when you register for an account, update or change information for your account, purchase products or services, complete a survey, sign-up for email updates or online courses, participate in our public forums, send us email messages, in-person conference registration by mail-in form or by telephone, and/or participate in online courses or other services on our Sites. This may include the following personal information:

- **Contact information** (such as your name, email address, address or phone number);
- **Professional information** (such as your employer name, address, job title, department or job role);
- **Marketing information** (such as your contact preferences and interests);

- **Account login credentials** (such as user IDs, passwords and for some Services this may include your demographics and other information you or admins provisioning your account on your behalf provide to us);
- **Support data** (which is data you provide when you contact Aperian Global for support and which may include the products and services you use and other details that help us provide support, such as contact or authentication data, data about the state or condition of your device, or the content of your chats and other communications with Aperian Global's technical support team);
- **Billing information** (including your billing address, background information and associated identifiers);
- **Online content** (which includes personal information disclosed by you on blogs, online courses, webinars, quizzes, surveys and other services or platforms to which you are able to post information and materials);
- **Offline content** (which includes personal information disclosed by you on in-person events and offline courses), and
- **Applicant information** if you apply for a job with Aperian Global (such as your resume, desired pay, education and work history, whether you are over the age of 18, and visa status. You also may choose to provide your gender, ethnicity, veteran status, disability status, and links to your website, blog, portfolio, or LinkedIn profile);

We may also record or monitor our telephone or other communications with you, to the extent permitted by applicable law.

Providing your personal information is optional, but it may be necessary for certain services, such as for registration, or to access content. In such cases, if you do not provide your personal information, we may not be able to provide you with your request.

You are responsible for ensuring the accuracy of the personal information you submit to Aperian Global. Inaccurate information may affect your ability to use the Sites and our Services. For example, your email address should be kept current because that is one of the primary manners in which we communicate with you.

### ***Information we collect automatically***

We automatically collect certain device and usage information when you use or interact with our Sites, emails we send you, or as a part of your use of and interaction with our Services.

The information we collect includes:

- Information about the products or services you looked at or searched for and the services you used, including time spent and other statistical information.
- Information about your progress and completion of our online courses and activities.
- Details about your computers, devices, applications, and networks, including internet protocol (IP) address, cookie identifiers, mobile carrier, Bluetooth device IDs, mobile device ID, mobile advertising identifiers, MAC address, IMEI, advertiser IDs, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, language preferences, battery level, on/off status, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Sites, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Sites, and other actions taken through use of the Sites

such as preferences). We may collect this information through our Sites or through other methods of web analysis.

- Details about your internet, app, or network usage (including URLs or domain names of websites you visit, information about the applications installed on your device, or traffic data).
- Performance information, crash logs, and other aggregate or statistical information.

Aperian Global does not intentionally collect any special categories of data in connection with the Services.

We collect this information through our Sites, Services and through other technologies, such as cookies, web beacons, and tags. For more information, review our [Cookie Policy](https://www.aperianglobal.com/cookie-policy/) (<https://www.aperianglobal.com/cookie-policy/>).

### ***Information we collect from other sources***

We may receive information about you from other sources (including third parties from whom we have purchased personal information) and combine that information with the information we collect. For example, we collect personal information from joint marketing partners, channel partners, our affiliated companies, recruitment agencies, credit check agencies, lead generation providers, public databases, data providers, and social media platforms.

This information may include:

- mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, LinkedIn URLs, and custom profiles.

- resumes, credit history and order information; and updated delivery or payment information to correct our records; and customer support and enrollment information.

## 4. How we use your personal information

We use personal information about you for a variety of purposes and on the legal bases described in this Policy or disclosed to you in our Services, which in the preceding 12 months included:

- **Providing the Sites and our Services.** We use personal information which you provide to us in order to allow you to access and use the Site, to operate and provide the services, and in order to provide any information, products or services that you request from us to perform our contract with you. Where we have not entered into a contract with you, we process your personal information in reliance on our legitimate interests in operating and improving our internal operations, systems and Services, and to provide you with the content, products or services you access and request (e.g., to download content from our Sites).
- **Managing user registrations.** If you have registered for an account with us, we use your information to manage your user account to perform our contract with you according to applicable terms of service, or if we do not have a contract directly with you, in reliance on our legitimate interests in administering and managing your user account.
- **Providing customer support.** We use your personal information to diagnose problems and provide customer care and support services, including to help us provide, improve, and secure the quality of our products, services, and training, and to investigate security incidents in reliance on our legitimate interests. Call recording data may also be used to authenticate or identify you based on your voice to



enable Aperian Global to provide support services and investigate security incidents.

- **Sending administrative communications.** We may use your personal information to send you information related to services such as confirmations, invoices, service updates, security alerts, onboarding and other administrative messages to perform our contract with you, or if we have not contracted directly with you, in reliance on our legitimate interests in administering our products and services.
- **Improving and developing the Services.** We use your personal information relating to your use of the Site to build higher quality, more useful services by performing statistical analyses of the collective characteristics and behavior of our users, and by measuring demographics and interests regarding specific areas of our Sites, in reliance on our legitimate interests in developing and improving our Services, or where required, with your consent. For example, we use data, often in a de-identified form, to develop new features, capabilities, or products, improve the user experience, assess capability requirements, and identify customer opportunities.
- **Securing the Services.** We process your personal information by tracking use of our Services for the purposes of maintaining the safety and security of our Services, including verifying accounts and activity, investigating suspicious activity, and enforcing our terms and policies, in reliance on our legitimate interest in promoting the safety and security of our Services, systems and applications and in protecting our rights and the rights of others.
- **Managing our online offerings (including events).** We use your personal information to plan and host events, courses, or webinars for which you have registered or that you attend, including sending related communications to you, to perform our contract with you or

in reliance on our legitimate interests in administering and promoting the event or course.

- **Sending marketing communications.** We use your personal information we collect to send promotional communications, including product recommendations, and other non-transactional communications (e.g. marketing newsletters, SMS, or push notifications) about Aperian Global. This may include information about our products, promotions, or events as necessary for our legitimate interest in conducting direct marketing, or to the extent you have provided your prior consent. Please see the "Your Privacy Rights" section, below, to learn how you can control the processing of your personal information by Aperian Global for marketing purposes.
- **Complying with legal obligations.** We process your personal information when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws, to the extent this requires the processing or disclosure of personal information to protect our rights, or is necessary for our legitimate interest in protecting against misuse or abuse of our websites, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, or to respond to lawful requests.
- **Processing job applications.** We process your personal information if you apply for a job with Aperian Global, to evaluate your application and make hiring decisions, communicate with you and inform you of current and future career opportunities (unless you tell us that you do not want us to keep your details for such purposes), manage and improve our recruiting and hiring processes, or to conduct reference and background checks where required or permitted by applicable local law. We perform this processing to the

extent that it is necessary to comply with our legal obligations, for our legitimate interest in assessing the suitability of our candidates and managing our recruiting process, or, where required by applicable law, with your consent.

- **Registering office visitors.** We may process your personal information for security reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest in protecting our offices and our confidential information against unauthorized access.
- **For our business purposes.** We may use data for other legitimate business purposes in reliance on our legitimate interests, such as to update, expand, and analyze our records, identify new customers, data analysis, to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns, free trials and operating and expanding our business activities.

In carrying out these purposes, we combine information we collect from different contexts or that we obtain from third parties to give you a more seamless, consistent, and personalized experience, to make informed business decisions, and for other legitimate purposes.

## 5. How we share your personal information

Whenever we share your personal information with a third party provider we ensure that this is done so in accordance with applicable laws. The types of entities to whom we disclose and have disclosed information within the last 12 months, include:

- **With our affiliates** within the Aperian Global corporate group and companies we may acquire in the future when they become part of

the Aperian Global corporate group, to the extent such sharing of data is necessary to fulfill a request you have submitted via our Services or for customer support, marketing, technical operations, and account management purposes.

- **With our contracted vendors, consultants, and other third parties** who provide services to us such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support, and data enrichment for the purposes described above. We may also share your personal information and your performance in a given online course with the administrators/facilitators or other individuals designated by them to assist with the creation, modification or operation of the course. With our business customers, to the extent we act as a processor or service provider and you are an authorized user of our business customer.
- **To comply with laws** or to respond to lawful requests and legal process, protect the rights and property of Aperian Global and our agents, customers, and others, including to enforce our agreements, policies, and terms of use, or in an emergency, to protect the personal safety of Aperian Global, its customers, or any person.
- **In connection with business transfers**, during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another company. In accordance with applicable laws, we will use reasonable efforts to notify you of any transfer of personal information to an unaffiliated third party.
- **With your consent**, for example, when you agree to our sharing your information with other third parties for their own marketing purposes, subject to their separate privacy policies.

**We may also share aggregated or deidentified usage data with third parties to help us perform analysis and make improvements. Additionally, we may share anonymous usage data on an aggregate basis in the normal course of operating our business; for example, we may share information publicly to show trends in the use of our Services.**

**Any personal information or other information you choose to submit in communities, forums, or blogs on our websites may be read, collected, and used by others who visit these forums, depending on your account settings.**

**For further information on the recipients of your personal information, please contact us (see the "How to contact us" section below).**

### ***Links to third-party sites***

For your convenience we may provide links to sites operated by organizations other than Aperian Global ("Third Party Sites") that we believe may be of interest to you. The privacy practices of these websites and services will be governed by their own policies. We do not endorse and are not responsible for the privacy practices of these Third Party Sites. If you choose to click on a link to one of these Third Party Sites, you should review the privacy policy posted on the corresponding site to understand how that Third Party Site collects and uses your personal information. Please contact those third parties directly if you have any questions or concerns about their privacy policies and practices.

For example, it is possible that your payment information (such as credit card or debit card information) may be collected and stored by third party payment vendors.

## 6. Retention of your personal information

We keep your personal information for no longer than necessary for the purposes it was collected outlined in this Privacy Policy, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements.

Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly. We determine the appropriate retention period for personal information based on the amount, nature and sensitivity of your personal information processed, the potential risk of harm from unauthorized use or disclosure of your personal information and whether we can achieve the purposes of the processing through other means, as well as applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your personal information will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of that data.

For further information on applicable data retention periods, please contact us (see "How to contact us" below).

## 7. Confidentiality and security of your personal information

We consider the confidentiality and security of your personal information to be of the utmost importance. We use industry standard physical, technical and organizational security measures to keep your personal information confidential and secure and will not share it with third parties, except as otherwise provided in this Privacy Policy, or unless such disclosure is necessary in special cases, such as a physical threat to you or

others, as permitted by applicable law. Because the Internet is not a 100% secure environment we cannot guarantee the security of your personal information, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. It is your responsibility to protect the security of your login information, limiting access to your devices, and signing out of websites after your sessions.

In addition, our Site <https://www.globesmart.com> is ISO 27001 and 27701 certified. For more information, please visit the [ISO Certification site here \(https://globesmart.zendesk.com/hc/en-us/articles/360033772374-ISO-27001-2013-and-Data-Security\)](https://globesmart.zendesk.com/hc/en-us/articles/360033772374-ISO-27001-2013-and-Data-Security).

If you contact us by email, please note that email communications are typically not encrypted and should not be considered secure.

If you have reason to believe that the personal information that we hold about you is no longer secure, please contact us immediately (see "How to contact us" below).

## **8. International transfer of your personal information**

Personal information we collect may be stored and processed in your region, in the United States or in any other country where we or our affiliates, subsidiaries or service providers maintain facilities. We maintain primary data centers within the United States. Accordingly, if you reside or are located outside of the United States, your personal information will be transferred outside of the country where you reside or are located, including to countries that may not or do not provide the same level of protection for your personal information.

We are committed to protecting the privacy and confidentiality of personal information when it is transferred. We take appropriate steps designed to ensure that the personal information we collect under this Policy is processed as described in this Policy and according to applicable law wherever the personal information is located. In particular, we use a variety of legal mechanisms to ensure that the recipient of your personal information offers an adequate level of protection, including entering into the standard contractual clauses for the transfer of European data approved by the European Commission, or where required, we will ask you for your prior consent.

*EU-U.S. [Data Privacy Framework](#) and Swiss-U.S. Data Privacy Framework (for Aperian Global, Inc. only)*

Aperian Global participates in and has self-certified its compliance with the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework. While no longer relying on these frameworks for international data transfers, we have elected to continue our certification to the US Department of Commerce because the framework helps to protect your personal information. We therefore remain committed to subjecting all personal information received from the EEA member countries and Switzerland, respectively, in reliance on each Data Privacy Framework, to the Framework's applicable Principles. Aperian Global has certified to the US Department of Commerce that it adheres to the Data Privacy Principles. If there is any conflict between the terms in this Policy and the Data Privacy Principles, the Data Privacy Principles apply. To learn more about the Data Privacy Frameworks, and to view our certification, please visit [www.dataprivacyframework.gov](http://www.dataprivacyframework.gov).

Aperian Global is responsible for the processing of personal information it receives, under each Data Privacy Framework, and subsequently transfers to a third party acting as an agent on its behalf. Aperian Global complies with the Data Privacy Principles for all onward transfers of personal



information from the EEA and Switzerland, including the onward transfer liability provisions.

With respect to personal information received or transferred pursuant to the Data Privacy Frameworks, Aperian Global is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://www.jamsadr.com/submit/>

Under certain conditions, more fully described on the [Data Privacy Framework website](#) (<https://www.dataprivacyframework.gov/s/article/How-to-Submit-a-Complaint-Relating-to-a-Participating-Organization-s-Compliance-with-the-DPF-Principles-dpf>), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

## 9. Notice to California residents

This section provides additional details about the personal information we collect only about California consumers and the rights afforded to them under the California Consumer Privacy Act ("CCPA"). Aperian Global acts as a service provider for most of the personal information it receives or processes through the provision of its services and follows the instructions of its customers that engage Aperian Global with respect to how it processes your personal information. If you would like more information about how your personal information is processed by other companies, including our customers, please contact those companies directly.

Please, also note that this section does not apply to information that is outside of the scope of the CCPA, including, without limitation, information collected (i) about our employees, contractors, or job applicants; and (ii) from non-California residents. Further, the privacy rights described in this section do not apply to information that is collected from individuals acting as representatives of another business in connection with business communications or transactions with us (e.g., our customers' or vendors' employees).

In particular, the categories of personal information we collect and the sources from which we collect it are described in detail in the section entitled "personal information collected" above. The business and commercial purposes for which we collect this information are described in the section entitled "how we use your personal information"). The categories of third parties to whom we "disclose" this personal information for a business purpose are described in the section entitled "how we share your personal information").

Aperian Global does not "sell" your personal information to another business or third party for monetary or other valuable consideration.

### ***California Do Not Track Notice***

California law requires us to let you know how we respond to web browser Do Not Track (DNT) signals. Because there currently isn't an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time. For more information on "Do Not Track," visit <http://www.allaboutdnt.com>.

### ***Shine the Light Law***

Under California's "Shine the Light" law (California Civil Code Section § 1798.83), California residents who provide personal information in

obtaining products or services for personal, family or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year. To obtain this information, please send an email message to [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com) with "Request for California Privacy Information" on the subject line and in the body of your message (see "How to Contact Us" below).

## 10. Your privacy rights and choices

You have certain rights in relation to your personal information, and these rights will vary depending on your location. For instance, if you have an account with us, you can access your personal information and confirm that it remains correct and up-to-date.

In addition, if you no longer wish to receive marketing-related emails from us, you may opt-out by following the instructions in those emails (e.g. by clicking "Unsubscribe" or "Update my Preferences" at the bottom of any marketing email you receive from us). If you choose to no longer receive marketing information, we may still communicate with you regarding such things as your security updates, product functionality, responses to service requests, or other transactional, non-marketing purposes.

You can also send requests about changes to your information or your contact preferences, including requests to opt-out of sharing your personal information with third parties, by emailing: [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com).

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Sites do not currently interpret, respond to or alter its practices when it receives “Do Not Track” signals.

***EEA, United Kingdom or Switzerland residents and visitors***

If you are located in the EEA, United Kingdom or Switzerland, you also have the following rights regarding the personal information we control about you:

- you can access, correct, update, delete, and deactivate your personal information;
- you can object to the processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information;
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent; and
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in EEA and UK are available at [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

If you would like further information in relation to your rights or would like to exercise any of them, you may contact us via [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com) (see "How to contact us" below). We will

review and process your request in accordance with our obligations under applicable law.

### ***California residents***

This section may apply only to California consumers. The CCPA provides California residents with the additional rights listed below. To exercise these rights, please reach out to us at [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com) (see "How to contact us" below) with your request.

- Right to Know. You have the right to request access to, or a copy of the personal information we have collected, used, disclosed and sold about you over the past 12 months, including:
  - The categories of personal information we have collected, used, disclosed and sold about you;
  - The categories of sources from which the personal information is collected;
  - The business or commercial purpose for collecting your personal information;
  - The categories of third parties with whom we have shared your personal information; and
  - The specific pieces of personal information we have collected about you.
- Right to Delete. You have the right to request that we delete the personal information we have collected from you (and direct our service providers to do the same), subject to certain limitations under applicable law.
- Right to Opt-Out of the Sale of your personal information. You may also have the right to opt out of the sale of your personal

information. Aperian Global does not "sell" your personal information.

- Other Rights. You can request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. You also have the right not to be discriminated against for exercising your rights under California law.

If you are a California resident seeking to exercise your CCPA rights, or if you are an authorized agent wishing to exercise CCPA rights on behalf of someone else, please contact us via email at [privacy@aperianglobal.com](mailto:privacy@aperianglobal.com) with "CCPA" in the Subject Line. Please include your full name and email address along with why you are writing so that we can process your request in a timely manner.

Please note that to protect your personal information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorized agent (as applicable) have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your personal information.

## **11. Personal information pertaining to children**

Aperian Global strongly believes in protecting the privacy of children. Our Services are not intended for users under the age of 16 and we do not knowingly collect or maintain personal information from children under 16 years of age. No part of our Sites or Services are directed to children under 16 years of age. If you are under 16 years of age, then please do not use or access this Site at any time or in any manner. If you believe that we may have collected personal information from a minor without the requisite consent, please contact us as described in this Privacy Policy and

we will investigate and promptly address the issue. We will take appropriate steps to delete any personal information of children less than 16 years of age that has been collected on our Sites without verified parental consent upon learning of the existence of such personal information. We do not knowingly "sell," as that term is defined under the CCPA, the personal information of minors under 16 years old who are California residents.

## 12. Changing our Privacy Policy

Please note that we review our privacy practices from time to time, and that these practices are subject to change. Any change, update, or modification will be effective immediately upon posting on our Site. We will notify you of any material change to this Privacy Policy by posting a notice on our Site's homepage prior to the change becoming effective, for a reasonable period of time following such update, and by changing the effective date (located at the top of this page). Be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

## 13. How to contact us

If you have any privacy-related questions, suggestions, unresolved problems, or complaints you may contact us via [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com) or at Aperian Global, Inc., Attention: Privacy Department, 414 Fayetteville Street, 4th Floor, Raleigh, NC 27601, USA.

If you reside or are located in the EEA, the United Kingdom or Switzerland, our Privacy Team may assist with all queries regarding our processing of personal information at [privacydept@aperianglobal.com](mailto:privacydept@aperianglobal.com) or by registered mail at Aperian Global ApS., Bredgade 33, 2tv 6000 Kolding Denmark.

We are committed to ensuring this Policy is accessible to individuals with disabilities. If you wish to access this Policy in an alternative format, please contact us as described above.