

APERIAN GLOBAL® PRIVACY POLICY

Effective: October 15, 2021

Last updated: April 20, 2022

1.1.1: Purpose and who we are

This Privacy Policy applies to any users of Aperian Global services and web visitors of Aperian Global websites. Unless otherwise specified, this Policy applies to all Personal Information processed by Aperian.

The purpose of this Privacy Policy is to describe how Aperian Global, Inc. (“Aperian Global,” “us,” “we,” or “our”) collects, uses and shares information about you through our online interfaces (e.g., websites and mobile applications) owned and controlled by us, including www.aperianglobal.com and www.globesmart.com (collectively referred to herein as the “Site”) and any offline methods, such as workshop feedback or trade fair inquiries that Aperian uses to collect personal information. This Privacy Policy also describes how we transfer and process your personal information, as well as your rights in determining what we do with the information that we collect or hold about you. Please read this notice carefully to understand what we do.

If you do not understand any aspects of our Privacy Policy, please feel free to contact us at privacydept@aperianglobal.com. Your use of our Site is also governed by our Terms of Use. Aperian, Inc. is a Massachusetts corporation with a principal place of business at 414 Fayetteville Street, 4th Floor, Raleigh, NC 27601. If you reside or are located in the European Economic Area (“EEA”) Aperian is the data controller of all Personally Identifiable Information (as defined below) collected via the Site and of certain Personally Identifiable Information collected from third parties, as set out in this Privacy Policy.

1.1.2: EU-U.S. Privacy Shield and Swiss-U.S. Privacy

Shield

Aperian Global participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. While Privacy Shield is no longer considered adequate by the EU Courts, we have elected to continue our certification to the US Department of Commerce because the framework helps to protect our users' personal information. We therefore remain committed to subjecting all personal data received from the European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List.

Aperian Global is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Aperian Global complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield 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 data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at [**https://feedback-form.truste.com/watchdog/request**](https://feedback-form.truste.com/watchdog/request).

Under certain conditions, more fully described on the Privacy Shield website [[**https://www.privacyshield.gov/article?id=How-to-Submit-a-**](https://www.privacyshield.gov/article?id=How-to-Submit-a-)

Complaint], you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

1.1.3: What Information this Privacy Policy Covers

This Privacy Policy covers information we collect from you through our Site and through offline methods. Some of our Site’s functionality can be used without revealing any Personally Identifiable Information, though for features or services related to the Online Courses, Personally Identifiable Information is required. In order to access certain features and benefits on our Site, you may need to submit, or we may collect, “Personally Identifiable Information” which is information that relates directly or indirectly to an identified or identifiable individual (“you”). Personally Identifiable Information can include information such as your name, street address, email address, IP address.

You are responsible for ensuring the accuracy of the Personally Identifiable Information you submit to Aperian Global. Inaccurate information may affect your ability to use the Site, the information you receive when using the Site, and our ability to contact you. For example, your email address should be kept current because that is one of the primary manners in which we communicate with you.

1.1.4: What You Agree to by Using Our Site

Please understand that by submitting any Personally Identifiable Information to us, you consent and agree that we may collect, use and disclose such Personally Identifiable Information in accordance with this Privacy Policy, our **Terms of Use**, and as permitted or required by law. If you do not agree with these terms, please do not provide any Personally Identifiable Information to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Personally Identifiable Information, we may not be able to provide you with the services that can be offered on our Site. Consent can be withdrawn at any time by contacting

us at support@aperianglobal.com. Please note that we may also rely on legitimate interests or fulfillment of a contract to continue processing your data.

1.1.5: What Information We Collect

We gather two types of information about users through the Site:

1) **Information relating to your use of our Site.** When users come to our Site, we may track, collect and aggregate information indicating, among other things, which pages of our Site were visited, the order in which they were visited, when they were visited, and which hyperlinks were “clicked.” We also collect information from the URLs from which you linked to our Site. Collecting such information may involve logging the IP address, operating system and browser software used by each user of the Site. We may be able to determine from an IP address a user’s Internet Service Provider and the geographic location of his or her point of connectivity.

We also use (or may use) cookies and web beacons when you visit our Site. For more information on our use of cookies and web beacons, please refer to our [Cookie Policy](#).

2) **Personally Identifiable Information provided directly by you or via third parties.**

We collect Personally Identifiable Information that you provide to us 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, Online Courses, participate in our public forums, send us email messages, in-person conference registration by mail-in form or by telephone, mobile application, and/or participate in Online Courses or other services on our Site.

We may use the Personally Identifiable Information that you provide to respond to your questions, provide you the specific course and/or services you select, send you updates about Online Courses offered by Aperian Global or other Aperian Global events, and send you email messages about

Site maintenance or updates.

Account Registration. If you register for an account on our Site, you may be required to provide us with Personally Identifiable Information such as your name and email address.

Updates. Aperian may offer you the ability to receive updates either via email or by posting on portions of the Site only accessible to registered users. In order to subscribe to these services, you may be required to provide us with Personally Identifiable Information such as your name and email address.

Webinars. Aperian may offer public webinars from time to time (the “Webinars”) where you can share comments and thoughts. In order to participate in the Webinars, you may be required to register with us and/or provide us with Personally Identifiable Information such as your name and email address. Please keep in mind that information you post or make available in Webinars will be publicly available. You should not post any Personally Identifiable Information or other information of a personal or sensitive nature, whether relating to you or another person, on a Webinar. Please also reference our **Terms of Use**.

Participation in Online Courses. Aperian offers users the opportunity to participate in an Online Course on or through the Site. If you desire to participate in a course, you will be asked to provide us with certain information necessary to conduct such a course. This information may include your name, IP address and email address as well as optional information about your demographics.

If you participate in an online course, we may collect from you certain student-generated content, such as assignments you submit to instructors. We also collect course data, such as student responses to in-video quizzes, standalone quizzes, exams, and surveys. You should not include any Personally Identifiable Information or other information of a personal or sensitive nature, whether relating to you or another person, on assignments, exams, or surveys, except for information required to participate or submit such assignments, exams, or surveys.

Communications with Aperian. We may receive Personally Identifiable

Information when you send us an email message or otherwise contact us.

Third-Party Sites. We may receive your Personally Identifiable Information when you access or log-in to a third party site, e.g., Facebook, Twitter and/or other social media platforms, from our Sites. This may include the text and/or images of your Personally Identifiable Information available from the third party site.

Surveys. We may receive your Personally Identifiable Information when you provide information in response to a survey operated by us. This may include details about your education history and/or your employment.

Third-Party Credit Card Processing. Aperian provides you with the ability to pay for online content and other services using a credit card through a third party payment processing service provider. Please note that our service provider – not Aperian – collects and processes your credit card information.

1.1.6: How We Use the Information

Information relating to your use of our Site. We use 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 Site. We may also use this information to ensure the security of our services and the Site.

Personally Identifiable Information provided directly by you or via third parties. Except as set forth in this Privacy Policy or as specifically agreed to by you to Aperian Global or any third parties, Aperian Global will not disclose any of your Personally Identifiable Information. In addition to the other uses set forth in this Privacy Policy, we may disclose and otherwise use Personally Identifiable Information as described below.

Providing the Site and our services. We use Personally Identifiable Information which you provide to us in order to allow you to access and use the Site and in order to provide any information, products or services that

you request from us.

Updates. We use Personally Identifiable Information collected when you sign-up for our various email or update services to send you the messages in connection with the Site or an online offering. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Participation in online courses, content, and services. We use the Personally Identifiable Information that we collect from you when you participate in online offerings through the Site for processing purposes, including but not limited to tracking progress and completion of online courses. We may also share your Personally Identifiable 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. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Communications with Aperian. When you send us an email message or otherwise contact us, we may use the information provided by you to respond to your communication and/or as described in this Privacy Policy. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Disclosure to Aperian Operations and Maintenance Contractors. We use various service providers, vendors and contractors (collectively, “Contractors”) to assist us in providing our products and services to you. Our Contractors may have limited access to your Personally Identifiable Information in the course of providing their products or services to us, so that we in turn can provide our products and services to you. These Contractors may include vendors and suppliers that provide us with technology, services, and/or content related to the operation and maintenance of the Site or the online content. Access to your Personally Identifiable Information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for

US.

Advertising Choices and Control.

As described in this Privacy Policy, Aperian Global or third parties on our websites www.aperianglobal.com and www.globesmart.com may use cookies and similar tracking technologies to collect information and infer your interests for interest-based advertising purposes. If you would prefer to not receive personalized ads based on your browser or device usage, you may generally express your opt-out preference to no longer receive tailored advertisements. Please note that you will continue to see advertisements, but they will no longer be tailored to your interests. To opt-out of interest-based advertising by participating companies in the following consumer choice mechanisms, please visit:

- Digital Advertising Alliance (DAA)'s self-regulatory opt-out page (<http://optout.aboutads.info/>) and mobile application-based "AppChoices" download page (<https://youradchoices.com/appchoices>)
- European Interactive Digital Advertising Alliance (EDAA)'s consumer opt-out page (<http://youonlinechoices.eu>) -Network Advertising Initiative (NAI)'s self-regulatory opt-out page (<http://optout.networkadvertising.org/>).

In the mobile environment, most mobile operating systems offer device-based opt-out choices that are transmitted to companies providing interest-based advertising. To set an opt-out preference for a mobile device identifier (such as Apple's IDFA or Android's GAID), visit the device manufacturer's current choice instructions pages, or read more about sending signals to limit ad tracking for your operating system here: <http://www.networkadvertising.org/mobile-choices>.

Please note that these settings must be performed on each device (including each web browser on each device) for which you wish to opt-out, and if you clear your cookies or if you use a different browser or device, you will need to renew your opt-out preferences.

Government Authorities, Legal Rights and Actions. Aperian may share your Personally Identifiable Information with various government authorities in

response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights or to protect our property; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us. We also may share your Personally Identifiable Information when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Aperian, the Site, our users, customers, or others; and in connection with our Terms of Use and other agreements.

Disclosure to Acquirers. Aperian may disclose and/or transfer your Personally Identifiable Information to an acquirer, assignee or other successor entity in connection with a sale, merger, or reorganization of all or substantially all of the equity, business or assets of Aperian to which your Personally Identifiable Information relates.

1.1.7: Third-Party Sites

For your convenience we may provide links to sites operated by organizations other than Aperian (“Third Party Sites”) that we believe may be of interest to you. We do not disclose your Personally Identifiable Information to these Third Party Sites without obtaining your consent. 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 other site to understand how that Third Party Site collects and uses your Personally Identifiable Information.

1.1.8: Retention of Personally Identifiable Information

If you reside or are located in the EEA, we keep your Personally Identifiable Information for no longer than necessary for the purposes outlined in this Privacy Policy for which the Personally Identifiable Information is processed. The length of time we retain Personally Identifiable Information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or

defend our legal rights.

1.1.9: Confidentiality & Security of Personally

Identifiable Information

We consider the confidentiality and security of your information to be of the utmost importance. We do not use and disclose personal information for purposes that are materially different from the purposes for which it was collected. We will provide you with reasonable mechanisms to exercise their choices. We will use industry standard physical, technical and administrative security measures to keep your Personally Identifiable 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 Personally Identifiable 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.

If you contact us by e-mail, please note that e-mail 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 as described in this Privacy Policy.

1.1.10: Marketing Preferences

If you no longer wish to receive marketing-related emails from us, you may opt-out by clicking “Unsubscribe” or “Update my Preferences” at the bottom of any marketing email you receive from us.

1.1.11: Updating or Deleting Your Personally

Identifiable Information

You have certain rights in relation to your Personally Identifiable Information. You can access your Personally Identifiable Information and confirm that it remains correct and up-to-date or choose whether or not you wish to receive material from us or some of our partners by logging into the Site and visiting your user account page. If you would like further information in relation to your rights or would like to exercise any of them, you may also contact us via privacydept@aperianglobal.com. If you are EU/EEA data subject you have the right to request that we:

- provide access to any Personally Identifiable Information we hold about you;
- prevent the processing of your Personally Identifiable Information for direct-marketing purposes;
- update any Personally Identifiable Information which is out of date or incorrect;
- delete any Personally Identifiable Information which we are holding about you;
- restrict the way that we process your Personally Identifiable Information;
- provide your Personally Identifiable Information to a third-party provider of services; or
- provide you with a copy of any Personally Identifiable Information which we hold about you.

We try to answer every email promptly where possible, and provide our response within the time period stated by applicable law. Keep in mind, however, that there will be residual information that will remain within our databases, access logs and other records, which may or may not contain your Personally Identifiable Information.

Please also note that certain Personally Identifiable Information may be exempt from such requests in certain circumstances, which may include if we need to keep processing your Personally Identifiable Information to

comply with a legal obligation. In any case, if we deny a request we will provide an explanation for our refusal. When you email us with a request, we may ask that you provide us with information necessary to confirm your identity.

Aperian Global will retain your information for as long as your account is active, as needed to provide you services. Aperian Global will use your information as necessary to comply with legal obligations, resolve disputes, and enforce agreements. Unless requested earlier, as a general rule Aperian Global will delete all personal information within a period of five years after your account has become inactive, however shorter retention periods may apply depending on our services.

1.1.12: Questions, Suggestions, and Complaints

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, our Privacy Team may assist with all queries regarding our processing of Personally Identifiable at [**privacydept@aperianglobal.com**](mailto:privacydept@aperianglobal.com). If you reside or are located in the EEA, you may also make a complaint to our supervisory body for data protection matters (namely the UK Information Commissioner's Office at [**dataprotectionfee@ico.org.uk**](mailto:dataprotectionfee@ico.org.uk)) or seek a remedy through local courts if you believe that your rights have been breached.

1.1.13: California Privacy Rights

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 (e.g. requests made in 2018 will receive information regarding 2017 sharing activities). To obtain this information, please send an email message to privacydept@aperianglobal.com with “Request for California Privacy Information” on the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response.

1.1.14: International Privacy Practices

Aperian’s Sites are primarily operated and managed on servers located and operated within the United States. In order to provide our products and services to you, we may send and store your Personally Identifiable Information (also commonly referred to as personal data) outside of the country where you reside or are located, including to the United States. Accordingly, if you reside or are located outside of the United States, your Personally Identifiable Information may 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 Personally Identifiable Information. We are committed to protecting the privacy and confidentiality of Personally Identifiable Information when it is transferred. If you reside or are located within the EEA and such transfers occur, we take appropriate steps to provide the same level of protection for the processing carried out in any such countries as you would have within the EEA to the extent feasible under applicable law.

1.1.15: 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 bottom of this page). Be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

1.1.16: No Information from Children Under 13

Aperian Global strongly believes in protecting the privacy of children. In line with this belief, we do not knowingly collect or maintain Personally Identifiable Information on our Site from persons under 13 years of age, and no part of our Site is directed to persons under 13 years of age. If you are under 13 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 Personally Identifiable Information of persons less than 13 years of age that has been collected on our Site without verified parental consent upon learning of the existence of such Personally Identifiable Information.