

## PRIVACY POLICY

The following Privacy Policy (“Privacy Policy”) applies to the [www.pathwaystoempower.com/](http://www.pathwaystoempower.com/) website (the “Site”), Content, and Service, and the platform, solutions, mobile software, and other software, used or provided in connection with the applications, website, services and products made available by Pathways to Empower LLC (“Company”), and describes how we collect, protect, use and share information gathered about you on our Site or through other means.

BY USING THE SITE, CONTENT, OR SERVICE, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND OUR TERMS OF USE AS THEY MAY BE MODIFIED OR AMENDED FROM TIME TO TIME BY COMPANY IN ITS DISCRETION. ANY SUCH AMENDMENTS TO THIS PRIVACY POLICY BECOME EFFECTIVE AT THE TIME THEY ARE POSTED TO THE SITE, AND EACH TIME YOU ACCESS OR USE THE SITE, CONTENT, OR SERVICE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY, AS AMENDED. **IF YOU DO NOT AGREE, YOU SHOULD DISCONTINUE USE OF THE SITE, CONTENT, AND SERVICES IMMEDIATELY.**

BY ACCESSING OR UTILIZING OUR SITE, CONTENT OR SERVICE, YOU CONSENT TO RECEIVE E-MAIL MESSAGES FROM COMPANY. YOU CAN OPT-OUT OF RECEIVING COMMUNICATIONS FROM COMPANY BY E-MAILING [Jason@PATHWAYSTOEMPOWER.COM](mailto:Jason@PATHWAYSTOEMPOWER.COM) WITH THE SUBJECT LINE “UNSUBSCRIBE.”

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use.

The words “we”, “us” and “our” means Company. The words “you” and “your” refers to the person accessing or using the Services. To the extent you access or use the Site or Services as an employee, manager, member or agent of any entity, you also accept this Privacy Policy on behalf of such employer, principal or other entity.

### INFORMATION WE COLLECT

1. Personal information obtained from you may include your name, email address, and other information necessary to complete your requests to us, and the date, time, and content of your messages. Other information collected from you include Your Information. All of the foregoing is subject to this Privacy Policy.
2. We may collect information about you from other third parties engaged to provide your requests, other third-parties and services, and publicly available sources. For example, we may receive information about you when you interact with Company or the Site through various social media, such as Facebook and Twitter. The data we receive is dependent upon your privacy settings with the social network, which you can change at any time.
3. Company does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to register as users or customers. If you believe that we might have any information from a person under 18 years of age, please contact us at [jason@pathwaystoempower.com](mailto:jason@pathwaystoempower.com).
4. If you have any questions about reviewing, modifying or deleting your information, you can contact us directly at [jason@pathwaystoempower.com](mailto:jason@pathwaystoempower.com). We may retain your information for a commercially reasonable time for backup, archival, or audit purposes.

### HOW WE PROTECT INFORMATION

5. Our Site, Content, and Service may integrate with or contain links to other third-party sites and services. Your interactions with any third-party website or service are subject to that third party's own rules and policies. We are not responsible for the use of such information by any third party.
6. Company utilizes services provided by Thinkific and if you create an account or purchase Content or Services, you consent to the use of your personal information, including, but not limited to, name and email address, pursuant to Thinkific's Privacy Policy found here <https://www.thinkific.com/privacy-policy/> under the section titled "Information from our customers' students/subscribers ("learners")". If you make a purchase, all credit card information is handled securely by our credit card processor, [Stripe](#). Company does not collect, store, or process your credit card information.
7. Information collected about you through our Site, Content, and Services is stored using a cloud-based service and is processed in the United States.
8. We do not undertake to review, edit, manage or determine the suitability, legality or value of Your Information entered, provided, or uploaded to the Site or in connection with our Services.
9. We use commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information collected through our Site and Services.
10. Please understand that no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, Company will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

## **HOW WE USE INFORMATION**

11. Your information is collected for the purpose of providing our Content and Services, including, but not limited to, processing your requests, and to assist with and respond to your inquiries, and to improve our Services.
12. We may use cookies and other tracking technology to collect certain types of usage information when you visit our Site. Cookies (a small text file containing a string of alphanumeric characters) uniquely identify your browser and lets us enhance your navigation through the Site. A cookie may also convey information to us about how you use our Site and allow us to track your usage of the Site over time. We may also collect log file information about your browser each time you access the Site. Log file information may include anonymous information such as your Internet Protocol ("IP") address, browser type, information about your mobile device, referring / exit pages and URLs, number of clicks and how you interact with links on our Site, domain names, landing pages, pages viewed, and other such information. The information allows for more accurate reporting and improvement of our Site and Services.
13. We may also collect analytics data, or use third-party analytics tools, to collect information sent by your browser, including the pages you visit, your use of third-party applications, and other information that assists us in analyzing and improving our Services. When you access our Site by or through a mobile device, we may receive or collect and store a unique identification number associated with your device (for example, a UDID, IDFA, Google Advertising ID or similar), mobile carrier, device type and manufacturer, and phone number.
14. We may use the data collected through cookies, log file, device identifiers, location data and pixel tags to: (a) remember information so that you will not have to re-enter it the next time you use our Site, Content, or Services; (b) provide custom, personalized content and information; (c) provide and monitor the effectiveness of our Site, Content, or Services, and our communications; (d) monitor aggregate metrics such as total number

of visitors, traffic, usage, and demographic patterns on our Site, Content, or Services; (e) diagnose or fix technology problems; and (f) otherwise to plan for and enhance our Services and our Site.

15. For the purposes of the General Data Protection Regulation (GDPR) (EU 2016/679) and applicable national implementing laws in your jurisdiction, and with respect to all Your Information, you acknowledge and agree that you are the data controller, and we are a data processor. You also acknowledge and agree that you are responsible for complying with all obligations of a data controller under applicable law. We agree that we shall process Your Information on your behalf in accordance with your instructions and in order to provide the Services and any instructions received from time to time, and that we have taken and will continue to take adequate technical and organizational measures against unauthorized or unlawful processing of, accidental loss or destruction of, or damage to, Your Information comprising personal information.
16. We may otherwise use your information only with your consent.
17. If we use your information to send you marketing information about our Services you may opt out (including, without limitation, by using the unsubscribe links in the email messages).
18. You may “opt out” of the collection of any information through cookies or other tracking technology by managing the preferences or settings on your browser. However, if you decide not to accept our cookies, your ability to use some Service features and Site features may be impaired. Please refer to your browser's technical information for instructions on how to delete and disable cookies, and other tracking/recording tools.

## **HOW WE SHARE INFORMATION**

19. We may share your personal information:
  - a) With third-party vendors and other service providers as needed to fulfill your requests and provide Services to you;
  - b) With third-party vendors and other service providers that perform services on our behalf, such as hosting and record-keeping services;
  - c) With our parent, subsidiaries, divisions, and affiliates, as applicable;
  - d) As an asset of ours in connection with a company transaction, such as a merger, sale of all or a portion of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy or related or similar proceedings;
  - e) With third parties as required by law or subpoena or, if we reasonably believe that such action is necessary, to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security, integrity, or reputation of our Site and Services; and/or (c) to exercise or protect the rights, property, or personal safety of Company, our users, or others;
  - f) We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, anonymized data with third parties; and
  - g) We may otherwise share your information only with your consent.

If you want to request that we delete your personal information or restrict sharing your personal information in some other way, you can email us at [jason@pathwaystoempower.com](mailto:jason@pathwaystoempower.com).

## **CAN-SPAM ACT**

20. The CAN-SPAM Act is a law that sets the rules for commercial email messages.
21. To be in accordance with CAN-SPAM, we agree to the following when we send e-mail messages:
- a) Not use false or misleading subjects or email addresses;
  - b) Identify the message as an advertisement in some reasonable way;
  - c) Include the physical address of our business or site headquarters;
  - d) Monitor third-party email marketing services for compliance, if one is used;
  - e) Honor opt-out/unsubscribe requests quickly; and
  - f) Allow users to unsubscribe by using the link at the bottom of each email.
22. If at any time you would like to unsubscribe from receiving future emails, you can email us at [jason@pathwaystoempower.com](mailto:jason@pathwaystoempower.com) or follow the instructions at the bottom of each e-mail and we will promptly remove you from all correspondence.

Please direct questions about this Privacy Policy to [jason@pathwaystoempower.com](mailto:jason@pathwaystoempower.com).

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