

# Regal Education Privacy Policy

**Updated: June 9, 2023**

Regal Education LLC (“Regal,” “us,” or “we”) understands the importance of privacy. In this Privacy Policy (the “Privacy Policy”), we share our policies and practices with respect to the Personal Information that we collect about individuals.

Additionally, we disclose the choices and rights individuals have with respect to their Personal Information that we have collected

“Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household

## 1. Scope

This Privacy Policy applies to Personal Information we collect from users of our Sites, Apps, and other online services, as well the Personal Information we collect about individuals. This includes current and prospective students, alumni, learners, visitors to our sites, and others with whom we interact (e.g., Business-to-Business Representatives, as defined below). These interactions may be via phone, video conferencing, online, or offline and happen in the course of providing our courses, supporting programs, and other services (collectively, our “Services”)

Certain Services we offer may be provided by our business partners, and may be subject to additional privacy policies or privacy disclosures relating to the Services provided on our Site(s) (collectively, “Additional Policies”). In the event of a conflict between any Additional Policies and this Privacy Policy, the Additional Policies will take precedence

## 2. Definitions

In this Privacy Policy, the following terms have the following meanings:

“**Anonymized**” means information that has been sanitized so that it no longer identifies, relates to, describes, and is no longer reasonably capable of being associated with, or linked, directly or indirectly, to an individual. Anonymized information is no longer Personal Information

“**Apps**” means software programs which are be utilized on our Sites and accessed through our Services

“**Business-to-Business Representatives**” means representatives or agents of our business partners (who may be individuals or other companies) who may be contacted in relation to or as part of or our Services

“**Service Providers**” means organizations that Regal contracts with and who provide services on our behalf

“**Site**” means any website owned or operated by Regal, which links to or displays this Privacy Policy

“**Social Network**” or “**Social Networking**” means various Internet-based communication capabilities provided on the Services as well as on third-party social networking websites such as LinkedIn, Facebook, Twitter, etc., that facilitate interaction and conversation between people online. This includes, but is not limited to, chat sessions, discussion forums, blogs, news groups, etc

“**Social Network Content**” (or “**SNC**”) means user-generated content you consent to share via a Social Network which includes, but is not limited to, digital sounds and pictures as well as your Personal Information that you choose to upload to a Social Network. It also includes your Personal Information that may be displayed on the pages of other users on Social Network

### 3. Collection of Personal Information

We collect information about you in a number of ways: directly from you, from third parties, as well as automatically through your use of our Services or your interactions with us. The information we collect from these various sources may be aggregated and combined

**Directly Collected Information.** We collect Personal Information that you provide to us voluntarily (either online or offline). This includes when you: respond to one of our advertisements; participate in a survey we may conduct; request information from us; order educational or other products and Services; set up user profile; use our Services or one of our Apps; or interact with us online or offline. The Personal Information we collect directly may vary depending on the type of response or service requested. However it could include your name, contact details, date of birth, education history, and other information

**Information Collected from Other Sources.** We may also gather Personal Information from Service Providers, and publicly available sources, and we may combine this with other Personal Information we have collected. For example, we may receive Personal Information about you from your initial purchase of one of our Services, third-party accounts or platforms or that you use with one of our Services; and Service Providers that we work with. We may aggregate this data to identify prospective customers or other individuals who may be interested in our Services

**Automatically Collected Information.** The Services may use log files, cookies, third-party tags, and other means to automatically collect information about your use of our Services, including (but not limited to): device information such as your hardware model and operating system, IP address (and country, state, city relating to IP address, if available), unique device identifiers; collection date; connection speed; language settings; domain (e.g., .com, .net, .org, etc.); web pages viewed; and clicks or other actions taken. See the “Cookies and Similar Technologies” section below for more information. This information that we automatically collect may be linked with Personal Information to accomplish the purposes described in this Privacy Policy. Further, when you call us, we may record calls for training and quality purposes

#### Categories of Personal Information We Collect

The Personal Information we collect varies, and this depends upon the nature of the Services you use and how we interact with you. However, the we may collect Personal Information in the following categories:

- Name, contact information, and other identifiers:** name, address, telephone number(s), unique personal identifier, online identifier, email address, account name, or other identifiers
- Commercial information:** services or products purchased, or considered, as well as your history of purchasing
- Financial information:** credit and card numbers, as well as other financial information
- Demographic information:** personal characteristics such as race, ethnicity, gender, age, religion, national origin, citizenship status, and marital status
- Education information:** information regarding your past education
- Internet or other electronic network activity information:** internet protocol (IP) address including, which may include but is not limited to, search and browsing history; and information regarding your interaction with a website, application, or promotion

## 4. Use of Personal Information

The Personal Information we collect may be used for the following purposes:

- Administering applications, enrollment, registration, and financial services:** to maintain student records; to review and process registrations and applications for educational programs
- Providing support and services:** to provide our Services; to communicate with you about your access to and use of such Services; to respond to your inquiries; to provide troubleshooting, fulfill your orders and requests, process your payments, and provide technical support; for other customer service and support purposes; and to facilitate communications and collaboration with you and others in our student community, including through our Education Partners, Service Providers, and our social networking, community, and collaboration features
- Personalizing content and experiences:** we may tailor content we send or display on the Services so we can offer location customization and personalized help and instructions; to personalize your experiences with us; to reach you with more relevant promotions as well as to measure our promotional campaigns
- Marketing and promotional purposes:** to administer promotions; to promote our Services; to send offers, newsletters, or other information regarding our services that we think may interest you
- Analyzing and improving our services and operations:** to better understand how our students access and use the Services we offer; for analytical purposes, such as to evaluate and improve our Services and to develop additional programs, services, and features; and to improve our Services, and the experiences of our students
- Securing and protecting our assets and rights and preventing misconduct:** to protect our business operations, secure our network and information technology assets and services; to prevent and detect fraud, unauthorized access or activities; and, where we believe necessary, to investigate, prevent, or take action regarding suspected violations of our Terms of Use, or this Privacy Policy, as well as fraud, illegal activities, misconduct, and other situations involving potential threats to the rights or safety of any person
- Complying with legal obligations:** to comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements
- Supporting our general business operations:** to support the administration of our general business, our accounting and record keeping, and other legal functions, including to analyze operational and business results and risks, to collect outstanding amounts owed, and to maintain business records

**Anonymized information.** We may also amend information to create Anonymized data sets and reports in order to improve and develop our Services; and for other research and analytics purposes

## 5. Disclosure of Personal Information

We may disclose the Personal Information we collect as follows:

- Service Providers.** We may share your Personal Information with third-party Service Providers who may use this information to perform services for us, including payment processors, content providers, hosting providers, advertising and marketing partners, and customer service and support providers
- Education Partners.** We may share your Personal Information with our Education Partners who we work with to make available certain educational services, programs, courses, and/or

other offerings

•**Business Transfers.** We may disclose or transfer your Personal Information as part of any actual or contemplated merger, sale, transfer of our assets, acquisition, financing, or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted prior to such event, where permitted by law

•**Legally Required.** We may disclose your Personal Information in response to legal process or as required under applicable law or (such as in response to a court order or subpoena)

•**Protect our Rights.** We may disclose your Personal Information where we believe it is necessary to respond to comply with legal process or to claims asserted against us; to enforce and administer our terms of use and other agreements; for risk assessment, fraud prevention, investigation, and protection of the rights, property, or safety of our students and others

**Anonymized information.** We may share Anonymized information with Service Providers and/or other third parties for analytics, marketing, research, and other purposes, provided such information does not identify you

## 6. Data Transfers

We operate and may process information in multiple jurisdictions, both inside and outside the United States, such that some Education Partners and Service Providers may be located or process information outside of the jurisdiction in which you reside. In these cases, your Personal Information may be collected, used, disclosed, stored, and processed in these other jurisdictions for the purposes described in this policy

The data protection and other laws of the United States and other countries might differ from your jurisdiction. In addition, your Personal Information may be subject to the laws of those other jurisdictions, including lawful requirements to disclose Personal Information to government authorities

## 7. Cookies and Similar Technologies

We use cookies, tags, local storage objects (which are also called Flash cookies), web beacons, and other technologies (which may be provided by third parties) on our Services to ensure the functionality on our Services; for security and fraud prevention; to collect usage information about our Services and the emails that we send; and to personalize our content and to provide more relevant ads and information. We may combine the information we collect via these technologies with other information that we collect, including Personal Information

**Cookies.** Cookies are alphanumeric identifiers that are transferred to your computer through your web browser for record-keeping purposes. Some cookies enable you to log in to our Services or save certain settings and preferences, while others allow us to identify usage and activities on our Services, personalize content on our Services. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. Most browsers will tell you how to prevent your computer from accepting new cookies, or how to disable cookies altogether. If you disable cookies, however, certain features may not be available or function properly

**Embedded script (also called clear GIFs and web beacons).** Embedded scripts are tiny graphics with a unique identifier, which function in a similar fashion as cookies. However, cookies are stored on your computer's hard drive whereas embedded scripts are embedded invisibly on our web pages. We may use embedded scripts in connection with our Services to identify the activities of users of our Services, improve ads, personalize and manage content, and gather usage information about our Services. We may also use these in emails to help us analyze email response rates, identify when our emails are viewed, and determine whether our emails are forwarded

## 8. Interest-Based Advertising

We may work with Service Providers to display advertising on our Sites or to manage our advertising on other websites. These third-party networks and platforms often use cookies, embedded scripts, and other technologies to collect information about your activities on our Services and other websites over time to provide you targeted advertising based upon your interests. Some ads may be targeted to your interests and preferences, based on your browsing history and other information. Your browsing history may be followed in these cookies even if ads are not being displayed

## 9. Individual Rights and Choices

We describe your rights and choices regarding our use and disclosure of your Personal Information in this section

**Marketing Communications.** You may opt out of receiving marketing communications from us. Additionally, you may follow the unsubscribe instructions in the footer of any marketing email we send. Your opt-out requests to us will only remove you from our marketing list, not from the list of any other third parties.

If you do not wish to receive text messages, you may opt out by responding **STOP** to cancel future text messages. To get help, text **HELP**

**Social Networking Content.** You may change various user settings related to sharing your Personal Information contained in any user profile you set up as part of any Social Network activities we are involved with, subject to legal, contractual, or technical restrictions and reasonable notice. Please note that if you withdraw from Social Network activities we may be prevented from providing you with certain services

## 10. Children

We do not knowingly collect Personal Information from children under the age of 13. If we learn that we have collected or have received Personal Information from a child under 13 without appropriate parental consents, we will delete that information. If you believe we might have collected any information from a child under 13 without consent, please contact us via one of the methods in the “Contact Us” section below

## 11. Security Measures

We have security measures to protect against the misuse, alteration, and loss of the Personal Information we collect. Unfortunately, data transmission over the Internet cannot be completely secure

Therefore, although we do utilize security measures, we cannot guarantee you against the misuse, alteration, and loss of Personal Information under our control, and the Personal Information you have provided to us is at your own risk

We recommend that you take great care in how you handle and disclose your Personal Information and avoid sending Personal Information through insecure Internet channels, Social Networks, or email

## 12. Monitoring of Communications

We may monitor, record, and retain all incoming and outgoing communications for quality assurance and training of purposes. To the extent any such communications are retained, they are retained in

accordance with our records retention policy

### **13. Third-Party Websites and Links**

Some of our Services may link to other websites or access services provided by third parties who operate their own websites or provide services on their own behalf or on behalf of multiple service providers. These third parties may collect your Personal Information. They may apply their own policies on how your Personal Information is used

**Please make sure to read the policies of any websites or services you visit on the Internet carefully**

We cannot be and are not responsible for the privacy practices relating to these other websites nor services that are not operated by or exclusively for us. The collection, use, and disclosure of Personal Information about you will be subject to the policies applicable on those other websites

### **14. Privacy Policy Changes**

We may occasionally update or revise this Privacy Policy. Your continued provision of Personal Information or use of our Services following any changes to this Privacy Policy constitutes your acceptance of such changes. If we make a material change to this Privacy Policy, we will attempt to notify you in advance of such change via a notice on our Site and/or, when appropriate, via email to you.

### **15. Contact Us**

Should you have any questions about these Terms of Use, please contact us at:

[Compliance@RegalEducationFlorida.com](mailto:Compliance@RegalEducationFlorida.com)

or by mail to:

1615 S Congress Ave, Suite 103, Delray Beach, FL 33445