

Learning Innovation Catalyst Privacy Policy

Version 1

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Learning Innovation Catalyst (“**Company**”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect from users of the Learning Innovation Catalyst websites, located at [<https://lincspring.com/>] and <http://linc.education>] (collectively, the “**Sites**”) and online services (“**Services**”).

1. Questions; Contacting Company; Reporting Violations. If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or phone number:

2. Learning Innovation Catalyst
3. [Attn: Operations Manager]
4. 317 Ingraham St. NW, Washington DC 20011
5. support@lincspring.com

6. User Consent. By submitting Personal Data through our Sites or Services, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.

7. A Note About Children. We do not intentionally gather Personal Data from visitors who are under the age of 13. If a child under 13 submits Personal Data to Company and we learn that the Personal Data is the information of a child under 13, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a child under 13, please contact us at support@lincspring.com.

8. A Note to Users Outside of the United States. If you are a non U.S. user of the Sites, by visiting the Sites and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such transfer.

9. Types of Data We Collect. “**Personal Data**” means data that allows someone to identify or contact you, including, for example, your first and last name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data, such as your employer name and position title. “**Anonymous Data**” means data that is not associated with or linked to your Personal Data; Anonymous Data does not,

by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data, as described below.

10. Information You Provide to Us.

11. We may collect Personal Data from you, such as your first and last name, gender, e-mail and mailing addresses, professional title, company name, and password when you create an account to log in to our Lincspring network (“**Account**”).

12. Our Sites let you store preferences like how your content is displayed, your location, safe search settings, and favorite widgets. We may associate these choices with your ID, browser or the mobile device, and you can edit these preferences at any time.

13. When connecting to our Services via a service provider that uniquely identifies your mobile device, we may receive this identification and use it to offer extended services and/or functionality.

14. Certain Services, such as two-factor authorization, may require our collection of your phone number. We may associate that phone number to your mobile device identification information.

15. When you order services on our Sites, we may collect all information necessary to complete the transaction.

16. We retain information on your behalf, such as files and messages that you store using your Account.

17. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

18. When you post content (text, images, photographs, messages, comments or any other kind of content that is not your e-mail address) on our Sites, the information contained in your posting will be stored in our servers and other users will be able to see it, along with your profile photo and any other information that you choose to make public on your public profile page (“**Profile**”). The information that you provide in your Profile will be visible to others, including anonymous visitors to the Sites.

19. When you post messages on the message boards of our Sites, the information contained in your posting will be stored on our servers and other users will be able to see it.

20. When you participate in one of our surveys, we may collect additional profile information.

21. We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding support for the Services.

22.

23. We may also collect Personal Data, such as at other points in our Sites that state that Personal Data is being collected.

24. Information You Provide to Facebook and other Social Networking Sites. The Services allow users to access some social networking sites (“**SNSs**”), that we support, to interact with friends and to share on the SNSs. If you are already logged into the Services and the SNSs, when you connect to your SNS, you will be prompted to merge your profiles. If you are already logged into the Services but not logged into your SNS that we support, when you connect, you will be prompted to enter your SNS credentials or to “Sign Up” for the SNS. By proceeding, you are allowing the Services to access your information and you are agreeing to the SNS’s Terms of Use in

your use of the Services. Conversely, if you are not currently registered as a user of the Services, and you click on “Sign in” using the SNS that we support, you will first be asked to enter your SNS credentials and then be given the option to register for the Services. In this case, we may receive information from the SNS to make it easier for you to create an Account on the Sites and show our relevant content from your SNS friends. Once you register on the Sites and connect with the SNS you will be able to automatically post recent activity back to the other SNS. Any information that we collect from your SNS account may depend on the privacy settings you have with that SNS, so please consult the SNS’s privacy and data practices. You have the option to disable your SNS connection at any time by logging into your Account through the Sites and going to settings, “About Me,” “Linked Accounts,” and then unselecting the particular SNS. Further, you may be able to edit privacy settings for the reviews that appear on the SNS, or disconnect your Services activity stream by visiting the SNS Settings page.

25. Information Collected via Technology.

26. Information Collected by Our Servers. To make our Sites and Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

27. Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Sites, track users’ movements around the Sites, gather demographic information about our user base as a whole, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Sites or the Services again, it will recognize you and the information could then be used to serve advertisements and other information appropriate to your interests. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.

28. Cookies. Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Sites. This type of information is collected to make the Sites more useful to you and to tailor the experience with us to meet your special interests and needs.

29. Pixel Tags. In addition, we use “Pixel Tags”(also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we

are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users' Personal Data.

30. Collection of Data by Advertisers. We may also use third parties to serve ads on the Sites. Certain third parties may automatically collect information about your visits to this and other websites, your IP address, your ISP, the browser you use to visit our Sites (but not your name, address, e-mail address or telephone number). They do this by using Cookies, Pixel Tags or other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Sites and the other sites tracked by these third parties. This policy does not apply to, and we are not responsible for, Cookies or Pixel Tags in third party ads, and we encourage you to check the privacy policies of advertisers and/or ad services to learn about their use of Cookies and other technologies. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: <http://www.aboutads.info/choices> or <http://www.networkadvertising.org>.

31. How We Respond to Do Not Track Signals. We do not currently respond to "do not track" signals or other mechanisms that might enable consumers to opt out of tracking on our Sites.

32. Flash LSOs. When we post videos, third parties may use local shared objects, known as "**Flash Cookies**," to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from browser Cookies because of the amount and type of data and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

33. Analytics Services and Interest-Based Advertising. In addition to the tracking technologies we place, other companies may set their own cookies or similar tools when you visit our Sites. This includes third party analytics services, including but not limited to Google Analytics ("**Analytics Services**"), that we engage to help analyze how users use the Sites, as well as third parties that deliver content or offers. We may receive reports based on these parties' use of these tools on an individual or aggregate basis. We use the information we get from Analytics Services only to improve our Sites and Services. The information generated by the Cookies or other technologies about your use of our Sites and Services (the "**Analytics Information**") is transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity. The Analytics Services may also transfer information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Services' ability to use and share Analytics Information is restricted by such Analytics Services' Terms of Use and Privacy Policy. By using our Sites and Services, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above. For a full list of Analytics Services, please contact us at support@lincspring.com. We may also partner with ad companies to support our

marketing efforts, including by serving you ads better tailored to your likely interests. If you don't want to take advantage of these services, you may be able to opt-out by visiting <http://www.aboutads.info/> or <http://networkadvertising.org/choices/>, or if you are located in the EU, <http://www.youronlinechoices.eu/>.

34. Information Collected from You About Others. If you decide to invite a third party to create an Account, we will collect your and the third party's names and e-mail addresses in order to send an e-mail and follow up with the third party. We rely upon you to obtain whatever consents from the third party that may be required by law to allow us to access and upload the third party's names and e-mail addresses as required above. You or the third party may contact us at support@lincspring.com] to request the removal of this information from our database.

35. Google ID. We allow you to use your Google ID to set up an Account. If you wish to use your Google account you are taken to the Google website to login to your account and this information is then shared with us for the sole purpose of setting up your Account.

36. Information Collected from Third Party Companies. We may receive Personal and/or Anonymous Data about you from companies that provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our Sites. These third party companies may supply us with Personal Data. We may add this information to the information we have already collected from you via our Sites in order to improve the Services we provide.

37. Use of Your Personal Data

38. General Use. In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:

- facilitate the creation of and secure your Account on our network;
- identify you as a user in our system;
- provide improved administration of our Sites and Services;
- provide the Services you request;
- improve the quality of experience when you interact with our Sites and Services;
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
- send you administrative e-mail notifications, such as security, or support and maintenance advisories;
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- make telephone calls to you, from time to time, as a part of follow-up Services after you provide consent to call or if you elect for us to call you via telephone,
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of Company.

39. User Testimonials and Feedback. We often receive testimonials and comments from users who have had positive experiences with our Services. We occasionally publish such content. When we publish this content, we may identify our users by their first and last name and may also indicate their home city. We obtain the user's consent prior to posting his or her name along with the testimonial. We may post user feedback on the Sites from time to time. We will share your feedback with your first name and last initial only. If we choose to post your first and last name along with your feedback, we will obtain your consent prior to posting you name with your feedback. If you make any comments on a blog or forum associated with our Sites, you should be aware that any Personal Data you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these blogs and forums.

40. Creation of Anonymous Data. We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our Services and improve site navigation. We reserve the right to use Anonymous Data and aggregated and other de-identified information for any purpose and disclose Anonymous Data to third parties in our sole discretion.

41. Disclosure of Your Personal Data. We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

42. Third Parties Designated by You. When you use the Services, the Personal Data you provide will be shared with the third parties that you designate to receive such information, including other websites and business associates. Depending on the type of access you grant to such third parties, they may also be permitted to edit the information you have provided to us and to designate others to access and edit such information. You may change your settings at any time as to who has access to your information by going to your account settings and changing your publishing options.

43. Users. We will share your Personal Data with other users solely for the purpose of providing the Services.

44. Third Party Service Providers. We may share your Personal Data with third party service providers to: provide you with the Services that we offer you through our Sites; to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services to the Company. These third party service providers are required not to use your Personal Data other than to provide the services requested by Company.

45. Affiliates. We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under common control ("Affiliates"), in which case we will require our Affiliates to honor this Privacy Policy.

46. Corporate Restructuring. We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or

assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

47. Social Networking Sites. Some of our Services may enable you to post content to SNSs (e.g., Facebook or Twitter). If you choose to do this, we will provide information to such SNSs in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of those websites and that it is your responsibility to review the terms of use and privacy policy of the third party provider of such SNSs. We will not be responsible or liable for: (i) the availability or accuracy of such SNSs; (ii) the content, products or services on or availability of such SNSs; or (iii) your use of any such SNSs.

48. Disclosure to Third Party Companies. We may enter into agreements with companies that provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our website (“**Third Party Companies**”). We may share Anonymous Data with Third Party Companies. Also, Third Party Companies may want access to Personal Data that we collect from our customers. As a result, we may disclose your Personal Data to a Third Party Company; however, we will not disclose your Personal Data to any Third Party Company for the Third Party Company’s own direct marketing purposes, unless you have “opted-in” by following the instructions we provide to allow such disclosure. If you have opted-in to receive e-mail communications from a Third Party Company and later wish to discontinue receipt of these e-mails, please contact the Third Party Company directly to update your preferences. The privacy policies of these Third Party Companies may apply to the use and disclosure of your Personal Data that we collect and disclose to such Third Party Companies. Because we do not control the privacy practices of our Third Party Companies, you should read and understand their privacy policies.

49. Public Profile. Certain portions of the information you provide to us may also be displayed in your Profile. As an essential element of the Services, most of the Personal Data you explicitly provide to us when you register or update your Profile is displayed on your Profile. In order for your Profile to be made public, you must go to your profile settings and then to profile visibility. By default, your Profile is not for public viewing. Your photos, posts, friends, and other content you post to the Sites are also meant for public consumption. We may display this content on the Sites, and further distribute it to a wider audience through third party sites and services. Once displayed on publicly viewable web pages, that information can be collected and used by others. We cannot control who reads your posting or what other users may do with the information that you voluntarily post, so it is very important that you do not put Personal Data in your posts. Once you have posted information publicly, while you will still be able to edit and delete it on the Sites, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others (e.g., search engines).

50. Other Disclosures. Regardless of any choices you make regarding your Personal Data (as described below), Company may disclose Personal Data if it believes in good faith that such

disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Company; (c) to protect or defend the rights or property of Company or users of the Sites or Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

51. Third Party Websites. Our Sites may contain links to third party websites. When you click on a link to any other website or location, you will leave our Sites and go to another site and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

52. Your Choices Regarding Your Information. You have several choices regarding use of information on our Services:

53. Email Communications. We will periodically send you free newsletters and e-mails that directly promote the use of our Sites or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information above). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.

54. Cookies. If you decide at any time that you no longer wish to accept cookies from our Service for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser’s technical information. If you do not accept cookies, however, you may not be able to use all portions of the Service or all functionality of the Service. If you have any questions about how to disable or modify cookies, please let us know at the contact information provided above.

55. De-Linking SNS. If you decide at any time that you no longer wish to have your SNS account (e.g., Facebook or Twitter) linked to your Account, then you may de-link the SNS account in the “preferences” section in your account settings. You may also manage the sharing of certain Personal Data with us when you connect with us through an SNS, such as through Facebook Connect. Please refer to the privacy settings of the SNS to determine how you may adjust our permissions and manage the interactivity between the Services and your social media account or mobile device.

56. Changing or Deleting Your Personal Data. You may change any of your Personal Data in your Account by editing your profile within your Account]. You may request deletion of your Personal Data by us, and we will use commercially reasonable efforts to honor your request, but

please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud or similar purposes.

57. Changes to This Privacy Policy. This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here linc.education and lincspring.com and we will change the “Last Updated” date above. You should consult this Privacy Policy regularly for any changes.