

## Privacy Policy

**Effective Date: 15<sup>th</sup> July 2018**

The Experience Accelerator Sarl (“we” or “The Experience Accelerator”) is the company that controls the processing of your personal data on this website.

We are committed to protecting your personal privacy. This privacy policy explains the kinds of information that we collect on this website, and how we use and protect it. It also tells you what to do if you do not want your personal information collected when you visit the Sites, and how you can access, correct, delete or object to future use of personal information you have already provided.

### 1. General

The Experience Accelerator respects your right to privacy and data protection and will always use personal information in a fair and trustworthy manner. We operate our website in accordance with applicable laws and with generally accepted principles governing data protection.

This Privacy Policy applies to information that we collect, hold and process about living individuals.

The following sections of this Privacy Policy describe the types of personal information (“data”) we collect on <https://theexperienceaccelerator.com> or <https://theskillsaccelerator.com> or <https://educationavatar.com> (the “Sites”), the purposes for which we use those data, with whom we share them, and your rights with respect to your personal information. We also describe the measures we take to protect the security of the personal information we hold, how to contact us about our privacy practices, and how to exercise your rights.

### 2. Personal Data we may collect, use and process

2.1. When you visit <https://theexperienceaccelerator.com>, or <https://theskillsaccelerator.com> or <https://educationavatar.com> the following data will automatically be collected and stored on our servers:

- 2.1.1. the name of your Internet Service Provider,
- 2.1.2. your IP address,
- 2.1.3. the browser you use,
- 2.1.4. the operating system on the device used to access our website,
- 2.1.5. the website that you were using to reach us,
- 2.1.6. the websites that you visit while you are with us,
- 2.1.7. any search terms you have been using to find our website,
- 2.1.8. information on actions taken on our website,
- 2.1.9. language preferences,
- 2.1.10. physical location,
- 2.1.11. dates and times of website visits.

With the exception of the IP address, these are not personal information, but may allow conclusions to be drawn about visitors to the website. We use these data for system administration, security, backup, technical support and for statistical purposes.

2.2. We will collect, store and process the following kinds of personal information when you voluntarily provide us with them:

- contact information (name, postal address, email address, phone number);
- user name and password to access the Experience Accelerator services online;
- your account number;
- payment information (such as payment card or bank account number, card expiry date, delivery address and billing address); and
- content you provide (for example, photos or videos).

2.3. When you visit our website, we may use Cookies. For further information on the use of Cookies and similar means, please refer to our Cookie Statement.

### **3. How we use personal data**

Before we collect personal information from you, we will inform you how it will be used. We will use, store and process your personal information only for legitimate purposes. If you do not have an account with us, these may include:

- providing you with information you have requested; and
- helping you to use our website; and
- using demographic data in anonymized fashion to generate research reports

We will not use or process your personal information for any purpose that you have not agreed to in your declaration of consent [or through your actions on our website (e.g. by opening an account, registering for product information, placing an order and providing customer details)].

If you open an account and/or purchase goods or services from us, we will use and process your personal information to the extent necessary to:

- create and manage your account;
- manage your orders and invoices, and
- offer and provide coaching services to you;
- communicate with you about, and administer your participation in, surveys, events, programs, webinars, service information, newsletters, promotions and other offers;
- enable you to see content on our website (such as training materials and videos);
- respond to your enquiries and requests;
- register and provide support for services purchased by you;
- process claims we receive in connection with our services;
- operate, evaluate and improve our business (including developing new products and services; enhancing and improving our services; managing our communications; analysing

our products; performing data analytics; and performing accounting, auditing, billing reconciliation and collection activities and other internal functions);

- perform data analysis and processing (including market and consumer research, trend analysis, financial analysis, anonymisation, encryption and tokenisation of personal information);
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with and enforce legal requirements, relevant industry standards and our policies.

In addition, we use information collected online through cookies, web beacons and other automated means for purposes such as (i) customising our users' visits to our Sites, (ii) delivering content (including advertising) tailored to our users' interests and the manner in which our users browse our Sites, and (iii) managing our business. For further information on the use of Cookies and similar means, please refer to our Cookie Statement.

We may use third party web analytics services on these Sites, including Google Analytics. The providers of these services use technologies including cookies, web server logs and web beacons to help us analyse how visitors use website. The information we collect in this way is disclosed to the service providers, who use the information to evaluate use of the Sites. To learn more about Google Analytics and how to opt out, please visit [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

If we wish to use your personal information in other ways we will first obtain your consent.

#### **4. Online Tracking**

With your consent, we may collect information about your activities on our website, for use in providing you with advertising about products and services tailored to your individual interests.

We use Google Display Advertising (such as Remarketing with Google Analytics, Google Display Network Impression Reporting, DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting) to (1) show you our ads on other websites based on your prior visits to our Sites, and (2) better understand our ad impressions and use of ad services. In connection with the Google Analytics Demographics and Interest Reporting service, we may use data from Google's interest-based advertising or third-party audience data (such as age, gender and interests) with Google Analytics to understand and improve our marketing campaigns and Sites content.

Some of our online advertising takes place through Google Display Advertising. As part of this program, we use Google Analytics features such as Retargeting. In connection with that feature and others offered by ad networks, we and the operators of ad networks, including Google, may use third-party cookies (such as the DoubleClick cookie) – and in some cases first-party cookies (such as the Google Analytics cookie) – to inform, optimize and serve ads across the Internet based on a user's past visits to our Sites.

You can opt out of Google AdWords remarketing service and Google Analytics for Display Advertising by clicking [here](#). For further information on the use of Cookies and similar means, please refer to our Cookie Statement.

#### **5. Sharing of Personal Information**

We do not sell or otherwise disclose or share personal information we collect and hold about you, except as described here.

To the extent that you have provided consent and as permitted by applicable law we may share your personal information with:

- Service providers who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose any personal information except as necessary to perform services on our behalf and/or to comply with legal requirements. Examples of these service providers include businesses that create the avatars used within the Sites, university professors conducting research, process credit card payments, fulfill orders, and provide web hosting, training, event and marketing services. If we need to disclose your personal information to any other third parties we will do so only if we first have your consent. The only exception to the above is where we are required to disclose your personal information to law enforcement authorities based, when we believe disclosure is necessary to prevent physical harm or financial loss, and/or in connection with an investigation of suspected or actual fraudulent or other illegal activity.

We also reserve the right to transfer personal information we have about you if we sell or transfer all or a portion of our business or assets to a third party.

## **6. Data Transfers**

We may transfer personal data we collect and hold about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal data to other countries, we will protect that information as described in this Privacy Policy. If we transfer personal data to recipients outside the European Union (“EU”) or Switzerland, we will comply with the applicable legal requirements providing adequate protection for the transfer of personal data to recipients in countries outside of the EU or Switzerland, and make sure they provide the same level of data protection as provided within the EU or Switzerland.

Services providers and contractors who need access to your personal information to provide services on our behalf are required to keep that information in confidence, provide adequate security measures, and to refrain from using the information for any other purpose.

## **7. Your Right to Access and Correction**

You have the right to (i) access personal information we hold about you and obtain a copy of that information, (ii) update or correct inaccuracies in that information, (iii) object to our use of your personal information, (iv) request deletion of your personal data from our database and (v) request that we return your personal information to you or to a third party named by you. To exercise these rights, please contact us by email at [support@theexperienceaccelerator.com](mailto:support@theexperienceaccelerator.com). To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to personal information.

## **8. Links To Other Websites**

Our Sites may provide links to websites operated by third parties. We are not responsible for the content or the privacy practices of websites operated by third parties.

## **9. Updates to our Privacy Policy**

This Privacy Policy may be updated periodically. We will post a prominent notice on our website to notify you of changes to our Privacy Policy and indicate at the top of the Privacy Policy when it was most recently updated.

## 10. How To Contact Us

If you have any questions or comments about this Privacy Policy, or if you would like us to update information we have about you or your preferences, to exercise your rights of access, rectification, blocking, or deletion, or to object to the processing of your personal data, please contact us by email at [support@theexperienceaccelerator.com](mailto:support@theexperienceaccelerator.com).

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### Cookie Statement

This website uses cookies for the following purposes:

- Session management
- Logins
- Personalization
- User preferences, themes, and other settings
- Tracking
- Recording and analyzing user behavior

If you accept cookies, the web server supplying the webpage or managing files included in the webpage may store cookies on the device you are using when you look at the Sites. Another way of storing cookies is through JavaScript code contained or referenced in that page.

Each time you request a new page, the web server can receive the values of the cookies it previously set and return the page with content relating to these values; in other words, the cookies will be used to avoid repeating the entry of information you already provided. JavaScript code can also read a cookie belonging to its domain and perform an action according to the instructions in the cookie.