

## PRIVACY POLICY

We appreciate your trust and take several steps to protect your privacy. This Privacy Policy (this "Policy") describes how we collect and use information you provide when visiting the website (including any subdomains) located at <http://www.simplicit-elearning.com> (the "Site") or using the services available on the Site (the "Services") or by Core Consulting, Inc., a Michigan corporation, d/b/a Starling Center for Organizational Development ("Starling," "we," "us," or "our"). The Site and Services are made available to you, subject to this Policy and other requirements. By visiting the Site or using the Services, you are accepting the practices described in the latest version of this Policy. We may modify this Policy at any time by posting a revised version on the Site.

Our Privacy Policy explains:

What is Personal Information?  
What Information We Collect?  
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### **What is Personal Information?**

For purposes of this Policy, the following definitions shall apply:

"Agent" means any third party that collects or uses Personal Information under the instructions of, and solely for, us or to which we discloses personal information for use on our behalf.

"Content" means, unless the context requires otherwise, data, text, files, audio, video, images and/or other content.

"Personal Information" means any information or set of information that identifies or could be used by us or a third party to identify an individual.

"Sensitive Personal Information" means Personal Information that reveals personal information specifying medical or health conditions; personal sexuality; racial or ethnic origin; political opinions; religious, ideological or philosophical beliefs; trade union-related membership, views or activities; information on social security measures; or administrative or criminal proceedings and sanctions, which are treated outside pending proceedings.

"Third Party Content" means Content made available to you by any third party for or in conjunction with the Services.

"Your Content" means Content you input, add, edit or upload to the Services otherwise transfer, process, use or store in connection with the Services.

## What Information We Collect?

We collection information to better understand and recognize our customers. Information is collected from the Site and Services in two ways:

- Information you give us. We may collect information, which may include Personal Information, that you give directly to us. For example, if you create any type of an account (“Account”) with us, or an Account is created for you, we collect some or all of the following: username, individual name, and email address(es), and your choice of Services. We also record and retain information, which may include Personal Information, from the communications and interaction that you initiate with us, such as survey responses, inquiry forms, emails, posts, chats, and support tickets.
- Information from use of the Site and Services. We may collect information, which may include Personal Information, when you and third parties use the Site or Services. Like many websites, the Site also utilizes standard technology to generate web server logs and to read and write “cookies.” These technologies collect information about your use of the Site and Services. This information may include:
  - Visit information, such as date and time of use, referring/exit webpages, number of visits, pages visited, hyperlinks used, duration of visit, and search queries.
  - Device information, such as hardware model, settings, operating system version, internet protocol address, browser type and language, unique device identifiers, and mobile device information including mobile phone number, if applicable.
  - Location information, like GPS information, if enabled.
  - Unique application number.

We take reasonable steps to ensure that Personal Information is reliable for its intended use, accurate, complete and current. Please do not send us nor share with us any Sensitive Personal Information.

## How We Use Information that is Collected?

We use the information we collect about you and third parties in a number of ways, such as:

- Help you navigate the Site and Services.
- Facilitate the sign up of an Account and the subscription of Services.
- Providing you with the Services for which you have subscribed.
- To communicate with you regarding your use of the Site and Services.
- Personalize your experience and responding to your requests and inquires.
- Better understanding how the Site and Services are being used so we can improve them and engage and retain users.

- Diagnosing problems in the Site and Services.
- Tailoring a website, Service, application, or marketing to your likely interests.
- Sending you business messages such as those related to your Account.
- Sending you information about us, new Services or features, special offers, newsletters, and similar information (collectively, “Marketing Communications”).
- Conducting market research about our customers, their interests, and the effectiveness of our marketing campaigns.
- Reducing fraud, software piracy, and protecting us and our customers.

We will retain your Personal Information for as long as necessary to provide you with the Site and Services to which you have subscribed, or as needed to comply with our legal obligations or enforce our agreements.

### **What Information We Share?**

We are not in the business of selling Personal Information to others. We work with companies and Agents that help us run our business. These companies may provide services such as providing computing and network infrastructure resources, sending postal mail and email, delivering packages, analyzing data, website analytics, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. In some cases, these companies have access to some of your Personal Information in order to provide services to you on our behalf. They are not permitted to use your Personal Information for their own purposes.

We may share or publish aggregate information that doesn’t specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use our Site or Services. To the extent that we have your Sensitive Personal Information, without your affirmative or explicit (opt-in) permission, such information will not be disclosed to a third party or used for a purpose other than its original purpose or subsequently authorized purpose.

We may also share your Personal Information when:

- When you agreed to the sharing.
- When responding to an inquiry or request initiated by you, to the extent reasonably needed.
- Within our family of companies for purposes described in this Policy.
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- With our resellers, sales partners, and Agents if you are a business customer and agreed to receive our Marketing Communications. Note that we do not share Personal Information about consumers with third parties for their own marketing purposes unless the consumer agreed to that sharing.

- When we are required to provide information in response to a subpoena, court order, or other applicable law or legal process, or to comply with a written government request.
- When we have a good faith belief that the disclosure is necessary to prevent or respond to fraud, defend our websites, Services, or applications against attacks, or to protect the property and safety of us, our customers and users, or the public.
- When we have a legitimate business need and we are expressly authorized to do so by applicable law.
- When we have to collect money you owe us, including through legal proceedings.
- As needed, to identify, contact, or take legal action against customers or third parties violating our Acceptable Use Policy, interfering with property rights or with the Service, or breaking the law.
- If we merge with or are acquired by another company, we sell a website, application, or business unit or all or a substantial portion of our assets are acquired by another company. In those cases, your Personal Information will likely be one of the assets that is transferred.

#### **How Do We Respond to “Do No Track” Requests?**

The Site does not engage in the collection of personally identifiable information from users across third party websites or third party online services or applications. We do not knowingly enable other parties to collect personally identifiable information about our users’ activities over time and across different sites, applications or services.

#### **Your Options Regarding the Collection of Information?**

- You may choose not to provide certain Personal Information, but doing so may prevent you from creating an Account or using some Services.
- You may edit or update your profile and the related Personal Information associated with your Account at any time.
- Your web browser may allow you to block, restrict, or “opt-out” of our and third party’s use of cookies. Some web browsers also enable users to clear cookies that are stored on the browser.
- You may opt-out of any of our Marketing Communications. To do so, follow the unsubscribe link that appears at the end of each communication.

#### **What Information Can You Access/Update?**

To request access to your Personal Information or if you have privacy concerns about information we collect, please contact our Privacy Officer at [henry@Starlingcenger.org](mailto:henry@Starlingcenger.org). We will make commercially reasonable efforts to provide you reasonable access to your Personal Information, if any, we maintain within 30 days of your request. We provide this access to your Personal Information, if any, so you can review, correct, amend, or delete such information where it is inaccurate. In the unlikely event that we cannot provide you access to this information, we will explain why we cannot do so. For example, we may not be able to provide this access if it would be disproportionately burdensome or would violate the rights of others.

For California Residents. California Civil Code Section 1798.83 (S.B. 27), also known as the "Shine The Light" law, permits our customers who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to:

Starling Center  
Online Privacy Coordinator  
3000 Hunting Valley Dr.  
Ann Arbor, MI 48104

### **Security**

We understand that the security of your Personal Information is important. We provide appropriate administrative and security measures to protect against unauthorized access, disclosure, alteration, or destruction of your Personal Information. We use Secure Socket Layer (SSL) to encrypt the transmission of data on the Account application, login pages, payment processing, and with many of our Services. Please be aware, however, that despite our efforts, no transmission of information via the internet can be entirely secure and we cannot ensure or warranty the security of all information we collect. You should, therefore, always use caution when submitting Personal Information online.

### **Third Party Websites**

This Policy applies to our Site and Services, but not to a third party website or application that you may access from a hyperlink found on the Site or Services. If you submit Personal Information to any of those sites, your information is subject to their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.