

For legal purposes, only the English language version of the [Privacy Policy](#) is binding. Non-English versions are translated from the English language version for your convenience.

EBSCO LearningExpress®

PRIVACY POLICY

LAST UPDATED: January 1, 2020

This Privacy Policy sets forth LearningExpress’s privacy practices when you use our website, software, other products, or services (collectively, “Services”), including:

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LearningExpress, LLC (collectively, “LearningExpress” or “we” or “us” or “our”) respects the privacy of its users and we are committed to protecting our users’ privacy through our compliance with this Privacy Policy.

We want you to have a positive experience in connection with our products and services. Our goal is to provide you with an experience that delivers the information, resources, and services that are helpful to you. In order to achieve this goal, we may collect information from you. This Privacy Policy describes our information collection practices and the privacy principles we follow.

To exercise your privacy rights or to ask us questions about this Privacy Policy or our privacy practices, you can submit a request by contacting us using any of the methods provided in the “How Can I Exercise My Rights?” section of this Privacy Policy.

What Information Is Collected and How is it Used?

[Information about children’s data and Services directed toward children can be found at Section I of this Policy]

A. What Information Do We Collect?

1. **Personal Information:** LearningExpress collects, and has collected during the preceding 12-month period, the following categories of personal information (information that identifies you as an individual or relates to an identifiable individual) (collectively, “Personal Information”):

Category of Personal Information Collected	Categories of Sources from Which Personal Information is Collected	Business or Commercial Purpose(s) for Which Personal Information is Collected	Categories of Third Parties with Whom Personal Information is Shared
Personal Identifiers¹	<ul style="list-style-type: none"> • Individuals • Customers • Service Providers (single sign-on) 	<ul style="list-style-type: none"> • Features of our Services • Tracking usage of our Services • Feedback about our Services 	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms; communication providers; data analytics providers)
Characteristics of Protected Classifications²	<ul style="list-style-type: none"> • Individuals 	<ul style="list-style-type: none"> • Determining applicability of GDPR 	<ul style="list-style-type: none"> • None
Commercial Information³	<ul style="list-style-type: none"> • Our Systems (generated as our Services are used) 	<ul style="list-style-type: none"> • Features of our Services • Tracking usage of our Services • Feedback about our Services 	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms; data analytics providers)
Internet or Other Electronic Network Activity Information⁴	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms; other information technology systems; data analytics providers) 	<ul style="list-style-type: none"> • Delivery, operation, and security of our Services • Analytics • Improving the user experience 	<ul style="list-style-type: none"> • Service Providers (data analytics providers; internet service providers; operating systems and platforms)
Geolocation Data	<ul style="list-style-type: none"> • Customers 	<ul style="list-style-type: none"> • Tracking usage of our Services • Feedback about our Services 	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms; data analytics providers)
Professional or Employment-Related Information	<ul style="list-style-type: none"> • Individuals (Resume Builder users only) 	<ul style="list-style-type: none"> • Features of our Services • Tracking usage of our Services • Feedback about our Services 	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms)

Education Information ⁵	<ul style="list-style-type: none"> • Individuals 	<ul style="list-style-type: none"> • Features of our Services • Tracking usage of our Services • Feedback about our Services 	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms)
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If you submit any Personal Information relating to other people to us or to our service providers in connection with our Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

2. **Non-Personal Information:** LearningExpress collects information that does not directly reveal your identity or does not directly relate to an identifiable individual. This may include a unique identifier (unconnected to an individual’s Personal Information) and related analytics and usage information that we use to track usage of our Services, track trends in our Services, administer the Services, and improve our users’ experience.

B. How Do We Collect the Information?

The categories of sources from which we collect Personal Information are described in the table above.

We only collect and use Personal Information when you voluntarily provide it to us or when an institutional customer provides it to us in connection with its method of authenticating users for access to our Services, with the exception of your IP address, geolocation, and certain device information which may be automatically captured when you access our Services.

If you provide us Personal Information about others, or if others give us your Personal Information, we will only use that information for the specific reason for which it was provided to us.

In order to use some of our Services, or in order to undertake certain actions (such as saving test results), users over age 13 must first complete a registration form or provide an email address that will require disclosure of Personal Information. Such disclosure is strictly voluntary.

Because of how email communication works, you will have to disclose an email address to us if you choose to contact us or communicate with us by email.

We automatically collect non-Personal Information, generated from your use of our Services. We use this non-Personal Information in the aggregate. We do not combine these types of non-Personal Information with Personal Information.

Cookies and Similar Technologies: For information about the cookies and other tracking technologies used by our Services and how to manage your settings for these cookies and technologies, please visit our Cookie Policy.

C. How Do We Use the Information?

The business or commercial purpose(s) for which Personal Information is collected is described in the table above.

We use the Personal Information we collect for the limited purposes of processing your transactions, establishing the identity of account holders, customer service, authorization, customer support, content processing, content classification, and providing you with information about our Services. We will retain this information for as long as your account is active or as needed to provide you Services, comply with our legal obligations, resolve disputes, and enforce our agreements.

For example, you may view and modify your account information by navigating to the “My Center” page of our website and clicking on the “Update Personal Profile” link. If you have forgotten your password, you can click on the “Forgot your password?” link at the top right hand corner of the page at the “Sign-in” section of each page, to submit your email address and have your username and password emailed to you. We believe these personalization features are useful tools that will enhance the user’s experience at the site, but it does require the user to provide Personal Information to us.

We use the non-Personal Information we collect to administer the Services, perform diagnostics, collect content-specific usage statistics, protect the Services and their content from inappropriate use, and improve the user’s experience.

We may use the Personal Information and non-Personal Information we collect by sharing it with third-party agents, vendors, contractors, partners, or content providers of LearningExpress (collectively, “Service Providers”) for purposes of managing purchases of our products and services, servicing our systems, and obtaining support services for our businesses. We are not in the business of selling Personal Information to third-parties or Service Providers and will share it with Service Providers only as we describe in this Privacy Policy. In situations where we share Personal Information with Service Providers, we ensure access is granted to the Service Providers only upon the condition that the Personal Information is kept confidential and is used only for carrying out the services these Service Providers are performing for LearningExpress. As part of making the determination whether we will share Personal Information with Service Providers, we will obtain assurances that they will appropriately protect and maintain the confidentiality of Personal Information consistent with this Privacy Policy and as required by applicable law.

The Personal Information we collect from you may be transferred to, and processed in, countries other than the country in which you live. These countries may have data protection laws that are different than the laws of your country. Specifically, the servers we use to provide our Services are located in the United States. This means that when we collect your Personal Information, we may process it in the United States or the country where you live. However, when we process your Personal Information, irrelevant of its processing location, we take appropriate measures, as discussed below, to ensure that your Personal Information remains protected in accordance with this Privacy Policy.

We may share your usage data related to our Services with our affiliates and certain Service Providers for purposes of providing or improving our Services. We will not disclose any information about your usage data related to our Services to unaffiliated third-parties, except as necessary to provider our Services, enhance the product experience, service the legal agreement between us and your employer

or affiliated institution under which you are provided access to our Services, to enforce the terms of use, or to meet our contractual obligations to report aggregated usage data to content providers, or as required by law.

We also reserve the right to disclose your Personal Information if we are required to do so by law, or in the good faith belief that disclosure of the information is reasonably necessary to comply with legal process, and to the extent permitted by applicable local law, to respond to claims, or to protect or advance the rights, property, safety, or well-being of our company, our employees, customers, or the public.

We will not use your Personal Information for automated-decision making.

In the unlikely event that all or substantially all of the assets of LearningExpress are acquired, customer information, which may include Personal Information, may be one of the transferred assets unless restricted by applicable local law, in which case the acquiring entity will be subject to the same commitments for such customer information.

D. What is our Legal Basis for Collecting and Using Personal Information?

Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect Personal Information from you only:

- where we need the Personal Information to perform a contract with you or your organization;
- where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms; or
- where we have your consent to do so.

In some cases, we may also have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with your institution, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible impact if you do not provide your Personal Information).

Similarly, if we collect and use your Personal Information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact information provided below.

E. How Do We Secure Personal Information?

LearningExpress has taken appropriate technical and organizational measures to ensure that Personal Information we have collected or will collect in the future is secure. For example, we have limited the number of people who have access to Personal Information, by electronic security systems and authentication methods that guard against unauthorized access.

As a reminder, LearningExpress may provide links to third-party websites. These websites may not have the same privacy policies as LearningExpress. We take reasonable care in recommending these websites, but we are not responsible for their content or privacy policies. We urge users to read the privacy statement of a third-party website when leaving our Services and linking to a third-party website.

We always use industry-standard technologies when transferring and receiving consumer data we receive. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse, or alteration of information that we have collected from you in connection with our Services.

F. What Are My Rights?

Depending on your country or state of residency, you may have legal rights with respect to your Personal Information, including one or more of the following (each of which may be subject to certain exceptions that will be analyzed on a case-by-case basis):

Right to be Informed	An organization must provide certain information to individuals when collecting and processing their Personal Information.
Right of Access / Right to Know	Individuals have a right to obtain confirmation as to whether their Personal Information is being collected and/or processed. Individuals also have a right to request that an organization disclose the Personal Information it collects, uses, discloses, sells, and/or otherwise processes.
Right to Rectification	Individuals have the right to require an organization to correct inaccurate Personal Information concerning the individual and to have incomplete Personal Information completed, including by means of providing a supplementary statement.
Right to Restrict Processing	Individuals have the right to require an organization to restrict the processing of their Personal Information.
Right of Data Portability	Individuals have a right to receive a copy of their Personal Information in a portable and readily usable (structured, commonly used, and machine-readable) format that can be transmitted to certain third parties without hindrance.
Right to Object or Opt-out	Individuals can request an organization to stop processing and/or selling (if applicable) their Personal Information.

Right to Withdraw Consent	Individuals have the right to withdraw their consent to the processing of their Personal Information at any time when the processing is based on the individual's consent. Withdrawal of consent does not affect processing that occurred prior to such withdrawal (it only has future effect).
Right to Erasure or Deletion	Individuals can request the deletion of their Personal Information collected or maintained by an organization.
Right to Non-discrimination	An organization cannot discriminate against an Individual because of the exercise of their legal rights with respect to their Personal Information.
Right to not be Subject to Automated Decision Making	Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, if such processing has a legal effect or otherwise significantly affects the individual.
Right to Lodge a Complaint	If you are located in the European Union (EU) or European Economic Area (EEA), you have the right to lodge a complaint with a supervisory authority in relation to the processing of your Personal Information.

Additional Information Regarding the Right to Know and the Right to Opt-out

LearningExpress does not and will not sell Personal Information to third parties for a business or commercial purpose and has not sold Personal Information to third parties for a business or commercial purpose during the preceding 12 months or at any other time. Likewise, we do not and will not sell Personal Information of minors under 16 years of age without affirmative authorization and have not sold Personal Information of minors under 16 years of age during the preceding 12 months or at any other time.

We disclose, and have disclosed during the preceding 12-month period, the following categories of personal information to third parties for a business or commercial purpose:

Categories of Personal Information Disclosed
Personal Identifiers ¹
Characteristics of Protected Classifications ²
Commercial Information ³
Internet or Other Electronic Network Activity Information ⁴
Geolocation data
Professional or employment-related information
Education Information ⁵

Additional Information Regarding the Right to Object

If we process your Personal Information based on our legitimate interests, you can object to this processing in certain circumstances. In such cases, we will cease processing your Personal Information unless we have compelling legitimate grounds to continue processing or where it is needed for compliance and/or legal reasons. Where we use your Personal Information for direct marketing

purposes, you can always object or opt out by using the unsubscribe link in such communications or by submitting a request using any of the methods provided below.

G. How Can I Exercise My Rights?

We want to assure you that you can exercise any legal rights that you have with respect to your Personal Information. Upon request, we will tell you whether we have collected or processed any of your Personal Information.

If you would like to manage, change, limit, or delete your Personal Information, you can do so through your account settings within the Services or by submitting a request using any of the methods provided below.

To exercise any other legal rights with respect to your Personal Information, you may submit a request using any of the methods provided below.

We will respond to your request as soon as reasonably possible, but no later than the legally required timeframe.

To exercise your rights (or to ask us questions about this Privacy Policy or our privacy practices), you can submit a request using any of the methods below:

1. *Via Web:* Please [click here](#) (This hyperlink will redirect to our privacy management platform provided by our vendor, OneTrust, Inc.)
2. *Via Toll-Free Telephone:* 1-833-705-0124
3. *Via Mail:* LearningExpress
5724 Highway 280 E
Birmingham, AL 35242, USA
Attn: Data Privacy Officer, Legal Department
4. *Via Email:* privacy@ebSCO.com

Verification of Requests

All requests submitted to us will be verified to ensure that the person making the request (the “Requestor”) is the individual about whom we have collected Personal Information. The method we use to verify the Requestor’s identity may vary based on the type of customer or user, the Services used, and the type of Personal Information we have collected. In most cases, we will require the Requestor to provide the following information when submitting a request:

- Type of Customer or User
- First Name
- Last Name
- Email Address
- User ID (for students who don’t provide name and email address)
- Institution / Organization
- Country

- State
- Legal Relationship to the Subject of the Request

We will use this identifying information to communicate with the Requestor and receive confirmation that they submitted the request, and then match this identifying information with the Personal Information we already maintain. We may also use the contact information that we already maintain to communicate with the individual to confirm that they submitted the request. In rare cases, we may ask for additional information to verify the request, which may include a signed declaration under penalty of perjury that the Requestor is the individual whose Personal Information is the subject of the request.

If the Requestor submits a request to delete Personal Information, we will separately confirm that the individual wants their Personal Information deleted.

We may deny a request if we cannot verify the identity of the Requestor to a reasonable degree of certainty or a reasonably high degree of certainty (depending on the type of request, the sensitivity of the Personal Information, and the risk of harm to the individual posed by a unauthorized request) or, in the case of a request to delete Personal Information, we may deny a request if we are not able to separately confirm that the individual wants their Personal Information deleted.

Authorized Agent

If you use an authorized agent to submit a request, we will require that you:

- provide the authorized agent written permission to act as your authorized agent; and
- verify the authorized agent's identity directly with us.

The above authorized agent requirements do not apply if you have provided the authorized agent with legally binding power of attorney in accordance with applicable law.

We may deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

What Choices Do I Have?

We understand that you may not want to allow our disclosure of your Personal Information to our Service Providers, or to let us use that information for purposes that you believe may be incompatible with the purpose for which it originally was collected or that you later may authorize. Therefore, you may contact us to inform us that you do not want to permit these uses of your Personal Information. To do so, please contact us using the contact information provided above.

It is important to us that the Personal Information we collect is appropriate and relevant to the purposes for which we intend to use it. We will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the person providing the information. LearningExpress will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete, and current.

You may sign-up to receive email newsletters or other marketing materials from us. If you would like to discontinue receiving this information, you may immediately update your email preferences free of cost by using the "Unsubscribe" link found in emails we send to you or through your account settings within

the Services or by submitting a request using any of the methods provided above.

H. Collection and Use of Information from Children: Information for Parents

Most of our Services are not directed toward children. For our Services that are designed to be used by children under 16 years of age, we comply with the provisions of the Children’s Online Privacy Protection Act (“COPPA”) and other applicable laws by providing a registration option that only collects non-Personal Information from users under 16 years of age. As an example, if a user under 16 years of age wants to use our personalization features, the user has the option to register without providing his or her first name, last name, or email address.

To the extent we collect any information of minors under 16 years of age that is considered personal information under any applicable law, we do not and will not sell such information without affirmative authorization and have not sold such information during the preceding 12 months or at any other time.

If you are a parent and have questions about our practices, please feel free to contact us using the contact information provided above.

I. How Long Do We Retain This Information?

We retain Personal Information we collect from you where we have an ongoing legitimate business interest or other legal need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no further legitimate business interest or legal need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

Questions

If you have any questions, comments, or concerns regarding this Privacy Policy or our practices, please use the contact information found at that page or provided above.

Changes to Privacy Policy

We will notify you of changes to this Privacy Policy by posting an updated policy on this page. You acknowledge that any use of our Services is based on this Privacy Policy, current at the time of use. If we make any material changes, we will notify you by email notification or a notice via the Services (such as a banner or pop-up) prior to the changes becoming effective and provide you with the ability to consent to these changes (such as an "I agree" or "OK" button, or a prominent statement indicating the changes are in effect and continued use of the Services signifies consent). We encourage you to periodically

review this page for the latest information on our privacy practices.

Miscellaneous

Alternative Format / Accessibility: To access this Privacy Policy in an alternative format, click here to download a PDF version. If you have accessibility questions, please contact accessibility@ebSCO.com.

Do Not Track Signals: LearningExpress does not recognize automated browser signals regarding tracking mechanisms, which may include 'do not track' instructions.

1. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, login credentials, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
2. Characteristics of protected classifications under California or federal law, like race, religion, gender, national origin, or sexual orientation.
3. Commercial information, including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies, such as content checkout and retrieval information and saved searches.
4. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
5. Education information, defined as nonpublic personally identifiable information under the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g and 34 C.F.R. Part 99).