

## **Ownership of Content; Agreement to Terms of Privacy Policy**

This Privacy Policy (the “Privacy Policy”) apply to all associated applications owned or operated by Thryve Group LLC, and its subsidiaries and affiliates (collectively, the “Company”) including, but not limited to, online course materials offered for download or on a SaaS basis and downloadable content bundles available for purchase through the Thryve website (collectively, the “Content”). The Content is the property of the Company and its licensors.

YOU ACKNOWLEDGE AND AGREE THAT BY DOWNLOADING, BROWSING, OR OTHERWISE USING THE CONTENT, SERVICES AND TOOLS OFFERED BY THE COMPANY, YOU HAVE AGREED, WITHOUT LIMITATION OR QUALIFICATION, TO BE BOUND BY THIS PRIVACY POLICY AND ANY ADDITIONAL TERMS THAT MAY APPLY. If you do not agree with this Agreement, please do not download or otherwise use the Content.

The Company reserves the right, at its sole discretion, to change, modify, add or remove portions of this Privacy Policy, at any time, consistent with applicable law. You agree to be bound by this Agreement and any amendments made thereto in the future so long as you utilize the Content. It is your responsibility to check this Agreement periodically for changes. The Company will post a notification on the Content platform or otherwise provide notice to you if the Privacy Policy materially changes. Such changes, whether in the form of modifications, additions, or deletions, shall become effective when specified in the relevant notification. If you do not agree to the changes, download, uninstall or continue to use the Content after the date they become effective. Your continued use of the Content following the posting of changes will mean that you accept and agree to the changes. As long as you comply with this Privacy Policy, the Company grants you a personal, non-exclusive, non-transferable, limited privilege to download, browse, and use the Content.

## **Contents of this Privacy Policy**

This Privacy Policy describes Company policies and procedures on the collection, use and disclosure of your information when you use the Content and tells you about your privacy rights and how the law protects you.

We use your personal data to improve the Content. By using the Content, you agree to the collection and use of information in accordance with this Privacy Policy.

## Definitions

For purposes of this Privacy Policy:

- Account means a unique account created by you to access the Content or Company Services
- Affiliate means an entity that controls, is controlled by, or is under common control with a party, where “control” means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority
- Content means the core content made available by the Company and downloaded or accessed by you on the client side
- Device means any device that can access the Content, such as a computer, cellphone, or digital tablet
- Personal Data is any information that relates to an identified or identifiable individual
- Service refers to the Application/App and provision thereof
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, and to perform services related to the Service or to assist the Company in analyzing how the Service is used
- Third-Party Social Media Service refers to any website or any social network platform through which a User can log in or create an account to use the Service
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself
- User means the individual accessing or using the Service or the Application(s), or the legal entity on behalf of which such individual is accessing or using the Service or the Application(s), as applicable

## Personal Data

While using the Content, we may ask you to provide us with certain personally identifiable information (“PII”) that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address
- First and last name
- Phone number
- Address, state, province, zip/postal code, city
- Usage data

## Usage Data

Usage Data is collected automatically when using the Content and Services.

Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, operating system, Internet Protocol Address ("IP Address"), browser type, browser version, App/Service data or locations that you access, time spent accessing such data or locations, unique device identifiers, and other diagnostic data.

We may also collect information that your browser sends whenever you visit the Content/Services.

### **Third-Party Social Media Services**

The Company allows you to create and log in to use the Content/Services through Third-Party Social Media Services, including but not necessarily limited to: Google, Facebook and/or Twitter.

If you decide to register through or otherwise grant us access to a Third-Party Social Media Service, we may collect Personal Data that is already associated with your Third-Party Social Media Service's account, such as your name, your email address, your activities or your contact list associated with that account.

You may also have the option of sharing additional information with the Company through your Third-Party Social Media Service's account. If you choose to provide such information and Personal Data, during registration or otherwise, you are giving the Company permission to use, share, and store such Personal Data and information in a manner consistent with this Privacy Policy.

### **Information Collected During Use of or Access to the Content**

While using or accessing the Content, in order to provide features of the Content, we may collect, with your permission:

- PII
- Financial information uploaded by you, the end user

We use this information to provide features of the Services and to improve and customize the Content and Services. The information may be uploaded to the Company's servers and/or a Service Provider's server, or it may be stored in your Device.

You can enable to disable access to this information at any time through your Device settings.

### **Use of Your Personal Data**

The Company may use Personal Data for the following purposes:

- **To provide and maintain the Content/Services**, including to monitor usage of the Content/Services
- **To manage your account** and your registration as a user of the Content/Services. The Personal Data you provide can give you access to different functionalities of the Content that are available to you as a registered user.
- **For the performance of a contract**: the execution, compliance and undertaking of the purchase contracts for products, items or services you may purchase through the Content or any other Service that are available to you as a registered user.
- **To contact you** by email, phone, SMS text, or other equivalent form of electronic communication such as push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including security updates, when necessary or reasonable for their implementation
- **To provide you with news and offers** as well as general information about other goods, services and events which we offer that are similar to those that you have already purchased or inquired about, unless you have opted not to receive such information
- **To manage your requests** to us as part of our customer support
- **For business transfers**: we may use your Personal Data to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about the Content/Service users is among the assets transferred
- **For other purposes**: we may use your Personal Data for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve the Content, Services, products, marketing and your experience

We may share your Personal Data in the following situations:

- **With Service Providers**: we may share your Personal Data with Service Providers to monitor and analyze the use of the Content/Services
- **With Affiliates**: we may share your Personal Data with our Affiliates, in which case we will require those Affiliates to honor this Privacy Policy. Affiliates include any parent company, other subsidiaries, joint venture partners, or other companies that we control or are under common control with us
- **With business partners**: we may share your Personal Data with our business partners to offer you certain products, services or promotions
- **With other Users**: when you share personal information or otherwise interact in public areas of the Content/Services with other Users, such information may be viewed by all Users and may be further publicly distributed on the App platform or elsewhere by those other Users. If you interact with other Users or register through a Third-Party Social Media Service, your contacts on the Third-Party Social Media Service may see your name, profile, pictures and description of your activity. Similarly, other Users will be able to view descriptions of your activity and communicate with you and view your profile.

- **With your consent:** we may choose to disclose your personal information for any other purpose with your consent.

### **Retention of Your Personal Data**

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (e.g. compliance with applicable laws and regulations), resolve disputes, and enforce our legal agreements and policies. The Company will also retain Usage Data for internal analysis purposes.

### **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. As such, this information and Personal Data may be transferred to and maintained on computers located outside your state, province, country or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction.

Your consent to this Privacy Policy, coupled with your submission of such information and Personal Data, represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and that no transfer of your Personal Data will take place to an organization or jurisdiction unless there are adequate controls in place to secure and protect your Personal Data and other information.

### **Disclosure of Your Personal Data**

Business Transactions. If the Company is involved in a merger, acquisition or asset sale, your Personal Data may be transferred or disclosed. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law Enforcement. Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities such as a court order or government agency.

Other Legal Requirements. The Company may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company or its Affiliates
- Prevent or investigate possible wrongdoing in connection with the Content/Services
- Protect the personal safety of Users of the Content/Services or the general public
- Protect against legal liability

### **Security of Your Personal Data**

The security of your Personal Data is important to us; however, no method of transmission over the internet, or method of electronic storage is ever 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

### **Children's Privacy**

The Content/Services do not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18 without verification of parental consent. If you are a parent or guardian of a child younger than 18 and you are aware that your child has provided us with Personal Data, please contact us immediately. If we become aware that we have collected Personal Data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

If your jurisdiction requires consent from a parent for provision of Personal Data or other information, we will require a parent or legal guardian's consent before collecting and using information of a minor.

### **Links to Other Websites**

The Content/Services may contain links to other websites that are not operated by the Company or its Affiliates. If you click on a third-party link, you will be directed to that third party's site. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services. We strongly advise you to review the Privacy Policy of every site that you visit.

### **Changes to this Privacy Policy**

We reserve the right to update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy in this space or by other push notifications, emails, or prominent notice.

## **Contact Us**

If you have any questions about this Privacy Policy, you can contact us:

- By email:
- By visiting our support website: