

Privacy Policy

Overview

This privacy policy applies to the privacy practices for www.globallearningsystems.com, www.keystoneondemand.com and www.keystonelearning.com (collectively referred to as 'website') and owned and operated by Bancroft Technology Group, Inc. and its subsidiaries Global Learning Systems LLC and Keystone Learning Systems LLC. This privacy policy describes how Bancroft Technology Group ("BTG", "we", "our", "us") collects and uses the personal information a user or "you" provide on our website. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Information Collection, Use, and Sharing

BTG is the sole-controller of the information collected on its web site. We only have access to collect information that you voluntarily provide us via email or other direct contact from you. BTG will not sell, share or rent this information to others in ways different from what is disclosed in this statement. BTG does not share or transfer personal information to third parties acting as agents. Further, BTG does not share or transfer personal information with non-agent third parties. Therefore, the provision regarding liability for the actions of agent processors does not apply because BTG will not transfer or share personal information to third parties. In the event that BTG changes its policy in the future, you will be provided with an opt-out choice prior to sharing your data with BTG.

Although we make every effort to preserve your privacy, we may need to disclose personal information when we have a good-faith belief that such action is necessary to comply with a court order or other legal process served on us.

BTG provides online training to employee-users of our company customers. We contract with the companies to provide this service, and we will not use the personal information collected from users in a way different than contracted for. In order to access our training programs, a user must first complete a registration form, which requires them to provide their contact information, including their names and e-mail addresses at a minimum. Depending on what our company customers need for human-resource management and verification, we may also collect employee numbers, titles, departments, divisions and groups. This information is used only to track users' progress on the program or programs for which they registered (or authorized by their employer) and to report that information to their employers. Users are not asked or required to provide information such as income level, gender or unique identifiers (e.g., Social Security numbers).

BTG collects non-personally identifiable information, including but not limited to browser type, IP address, operating system, the date and time of visits, the pages visited on the site, time spent viewing

the site, and return visits to the site. We also use Google Analytics, a service that records non-personally identifiable data such as browser type, operating system, the date and time of a visit, where visitors came from, the pages visited on this website, the time spent viewing site, where visitors went when they left the site, and return visits to the site.

We aggregate this non-personally identifiable data to better understand how visitors use our site, and to help manage, maintain, and report on use of our website. We may share this non-personally identifiable data with third parties for the limited purpose of reporting on use of our website, or to comply with applicable law. We do not rent, sell or share any non-personally identifiable data collected on this website with third parties for marketing purposes.

Cookies

Cookies are used on this website to:

- Understand and improve your experience using our site
- Allow us to track online patterns and preferences, as well as to identify return visitors.
- Allow you to share our content on social networking sites if you want to
- Facilitate behavioral advertising after you leave our site

Your Access to and Control over Information

BTG acknowledges the right of individuals to access their personal data. You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the email address or phone number provided below or on our website:

- See what information we have about you, if any.
- Change/correct/delete any information we have about you.
- Express any concern you have about our use of your data.

If you no longer wish to receive our informational and promotional communications from BTG, you may opt-out of receiving them by following the instructions included in each communication or contact us via our website.

Security

BTG takes precautions to protect your information both online and off-line. All such user information is restricted in our offices. Only employees who require the information to perform a specific job function are granted access to personally identifiable information. Additionally, our employees are kept up-to-date on our security and privacy practices. The servers that we store user information on are also kept in a secure environment.

The security of your personal information is important to BTG and we follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

BTG may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

EU-US Privacy Shield Framework

BTG complies with the EU-US Privacy Shield Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. BTG has certified that it adheres to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access and recourse, enforcement and liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view BTG's certification, please visit <https://www.privacyshield.gov/>

US-SWISS SAFE HARBOR FRAMEWORK

BTG complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. BTG has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor and to view our certification page, please visit <http://www.export.gov/safeharbor/>

Dispute Resolution

For European Union and/or Swiss Individuals:

In compliance with the EU-US Privacy Shield Principles and the US- Swiss Safe Harbor Principles, BTG commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss citizens with inquiries or complaints regarding this privacy policy should first send an email to: PrivacyComplaints@globallearningsystems.com.

For European Union Individuals:

BTG has further committed to address unresolved privacy complaints under the US-EU Privacy Shield to an independent dispute resolution mechanism, the BBB EU-US PRIVACY SHIELD, located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by BTG, please visit the BBB EU-US PRIVACY SHIELD web site at www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

For Swiss Individuals:

BTG has further committed to refer unresolved privacy complaints under the US-Swiss Safe Harbor to an independent dispute resolution mechanism located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by BTG, please visit www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

BTG is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Changes to This Privacy Statement

We reserve the right to modify this privacy statement at any time, as determined by BTG. Updates and changes to our privacy policy will be reflected in this privacy statement located on our website so you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If BTG makes any material changes in our privacy practices, we will post a notice on our web site notifying users of the change. In certain cases when we post the notice, we will also e-mail users who have opted to receive communications from us to notify them of the changes in our privacy practices.

Contacting Us

If you have any questions or suggestions regarding our privacy policy, please contact us at 866-245-5224 or email us at info@globallearningsystems.com

Effective date: 04/15/2015. Updated: 10/25/2016.