Privacy Policy Last Updated: June 24, 2022

KnowFully Learning Group, its affiliates and subsidiaries (collectively, "KnowFully Learning," "we," "us," or "our") have created this privacy policy (this "Privacy Policy") because we know that you care about how information you provide to us is used and shared. This Privacy Policy describes the information collection and use practices of KnowFully Learning in connection with all the websites owned or controlled by KnowFully Learning, including but not limited to the websites for brands owned or controlled by KnowFully Learning (collectively, the "Websites" and each, a "Website"), our continuing education platform (the "Platform"), our mobile applications, which are accessible through tablets, smart phones, and other devices (collectively, the "Apps" and each, a "App"), and products and services that are made available through the Websites and the Platform (the "Services").

Description of Users and Acceptance of Terms

This Privacy Policy applies to visitors to the Website, who view only publicly-available content ("<u>Visitors</u>"), and individuals who have signed up to access and use our Platform, App and/or Services ("<u>Registered Users</u>").

By visiting any of our Website, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use.

By access and/or using the Platform, App and/or Services or otherwise manifesting assent to this Privacy Policy, each Subscriber is agreeing to the terms of this Privacy Policy, and the accompanying Terms of Use.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

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The Information We Collect and/or Receive

In the course of operating our Websites, the Platform and the Apps, providing the Services and/or interacting with you, we will collect (and/or receive) the following types of information.

1. Contact Information

When you contact us or our customer support team via the Website, the Platform, or the App, email or by mail, when you call us, or when you sign up to receive our newsletter, you will be asked to provide certain information which may include your name, email address, and phone number (collectively, the "Contact Information"). The Contact Information is used to provide the requested service or information and to contact you for purposes of direct marketing of our current and future products and services.

If you would like to use the App, you will need to download the App from the Apple, Google Play or any other app store through which the App is made available to you.

2. Billing Information

In order to subscribe to or use our Services, you will be required to provide certain additional information which may include a credit card number, expiration date, billing zip code, activation code, bank information, and similar information ("Billing Information"). Such Billing Information will be collected and processed by our Third Party Payment Processor pursuant to the terms and conditions of their privacy policies and terms of use. We do not directly obtain, store or process any Billing Information.

3. CE Information

When Registered Users register for an account on the Platform or the App, in addition to providing Contact Information and a username and password, you will also be asked to provide your birthday, name of your employer, and your professional credentials and license number

(collectively, the "CE Information"). Such CE Information is used to create your account and administer and keep track of your CE credits.

4. Geolocational Information

We may automatically collect geolocation information from your device via your browser's location services. You may provide permission for this collection on the device level (e.g., you have consented to location services generally through your browser's settings) or by accepting our request for geolocation access on the Services. Please consult your browser's documentation regarding how to turn off location services. If you disable location services, you may not be able to use the full array of features and functionalities available through our Services.

5. Other Information

In addition to the Contact Information, CE Information, and Geolocational Information, we may collect or receive the following additional information ("Other Information"):

- From Your Activity. In an ongoing effort to improve the Websites, the Platform, the Apps, and the Services, we automatically collect certain information when you visit the Website, the Apps, and/or access or use our Platform or Services. This information includes but shall not limited to, IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website and the App you visit, and similar information concerning your use of the Website, the App, the Platform and the Services; information about a mobile device, including universally unique ID ("UUID"), App type and version (e.g., iOS or Android), carrier and country location, hardware and processor information (storage, chip speed, camera resolution, NFC enabled, and network type (WiFi, 2G, 3G, 4G) ("Activity Information").
- From Cookies. We also collect Activity Information by using "cookie" technology. Cookies are small packets of data that a website stores on the hard drive of your computer or mobile device to "remember" information about your visit. We may use session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer/device until you delete them). If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser's documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Websites, the Platform, and the Services may not function properly.
- Third-Party Analytics. We may use one or more third-party analytics services to evaluate your use of the Websites, the Platform, the Apps, and the Services, compile reports on activity (based on their collection of IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, data and time, amount of time spent on particular pages, what sections of the Website, the App and the Platform you visit, number of links clicked while on the Website, the App, and the Platform, search terms and other similar usage data), and analyze performance metrics. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing

and using any of the Website, the Platform, the App and/or the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Websites, the Apps, the Platform or the Services.

Below is a list of analytics providers that we use; however, such list may be subject to change based on how we wish to understand the user experience and we will endeavor to update it diligently. You may use the accompanying links to learn more about such providers and, if available, how to opt-out from their analytics collection.

For Google Analytics, please visit: https://www.google.com/analytics
For HubSpot, please visit: https://legal.hubspot.com/privacy-policy

The Information Collected by or Through Third-Party Advertisers/Remarketers

We may share Other Information about you with third parties that we have selected and approved for ad distribution and ad optimization (defined as the tailoring, targeting (i.e., behavioral, contextual, and retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data. You may choose to opt-out of this type of tracking and sharing of information at any time by selecting the specific partners you wish to exclude from this website http://www.aboutads.info/choices. You can also limit this type of tracking through the Do Not Track functionality in your web browser and a "Limit Ad Tracking" setting on iOS devices or a setting to "Opt out of Interest-Based Ads" on Android.

By accessing and using the Website, the Platform, the App, and/or the Services, you consent to the processing of data about you by these advertisers/remarketing providers in the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit the sites below. Please note that this list may be subject to change based on the campaigns that we run.

For Google Ads, please visit: https://policies.google.com/technologies/ads?hl=en-US

For Brainlabs, please visit: https://www.brainlabsdigital.com/privacy-policy/

For Facebook Ads, please visit: https://www.facebook.com/help/568137493302217

For LinkedIn Ads, please visit: https://www.linkedin.com/help/linkedin/answer/62931/manage-advertising-preferences?lang=en

For Microsoft Ads, please visit: https://account.microsoft.com/privacy/ad-settings/signedout

For AddShoppers, please visit: https://www.addshoppers.com/privacy

Text Messages

You may elect to receive SMS text messages from us regarding the continuing education programs that you have registered to attend, and/or continuing education programs that you may find of interest. These messages may use information automatically collected based on your actions while on our Websites, Platform and/or our Services and may prompt messaging such as reminders regarding the program, changes in dates/times, and requests for program reviews. To the extent you voluntarily opt to have SMS notifications sent directly to your mobile phone, we receive and store the information you provide, including your telephone number or when you read a text message. By opting-in to receive SMS text messages from us, you acknowledge that messaging and data rates may apply depending on your phone service provider. You may opt out of receiving SMS text messages at any time by texting "STOP" in response to the text messages you receive or by changing your notification and communication preferences in the Platform. However, by opting-out of receiving text messages, you may not be able to use full functionality of the Platform and Services.

How We Use Your Information

We use your information to provide our Websites, the Apps, the Platform and the Services to you, and to operate our business. These business services include:

<u>Service-Related Usage</u>. We use your information to provide and support the Websites, the Apps, the Platform, as well as to provide the Services to you, such as: Communicating with you and website visitors, soliciting your feedback, and informing you about our products and services. We may also send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance.

- Analyzing and Improving the Websites, the Platform, the Apps and the Services. We may run calculations, aggregate, normalize, clean, and make derivative works of the information obtained about you in order to
 - o Understand and analyze usage trends and preferences;
 - o Monitor and analyze the effectiveness of the Services;
 - Improve the Services and develop new products, services, features, and functionality; and
 - Test the Services and our infrastructure to make sure the Services are working correctly.
- Marketing: As permitted by applicable law, we may use your information for marketing purposes, such as informing you about our products and services and those of our third-party marketing partners that could be useful, relevant, valuable, or otherwise of interest to you. We may also use aggregated information (which does not identify you personally) for marketing purposes. Where required under applicable law, we will obtain your prior optin consent to send you electronic marketing communications.

How We Share Your Information

We may share transfer, or disclose your information if you consent to us doing so, as well as in the following circumstances:

- To provide our Websites, Apps, Platform and Services to you and to assist us running our business. We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing shipping, name and address verification, marketing, order fulfillment, email distribution, market research, third party advertising, fraud detection and prevention, promotions management, and payment processing. These other companies will have access to your information only as necessary to perform their functions and to the extent permitted by law. We may also share your information with any of our parent companies, subsidiaries, affiliates, or other companies under common control with us as well as with the brands owned or controlled by us.
- To better understand and serve our customers. In an ongoing effort to better understand our users, we might analyze your information in aggregate form in order to operate, maintain, manage, and improve the Websites, the Platform, the Apps, and the Services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.
- As part of the sale or other transfer of our business. As we develop our businesses, we might sell or buy businesses or assets. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or similar corporate event, then your information may be part of the transferred assets.
- **For legal purposes.** To the extent permitted by law, we may also disclose your information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such information is necessary or advisable, for example, to protect your, our or others rights, property, or safety.

We will take reasonable measures to require that any party receiving any of your information from us undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your information except with your consent, as permitted by law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your information.

Information Collected Through the Websites, Apps, Platform and Services that is Not Covered by this Privacy Policy.

You may voluntarily post and share information including, but not limited to comments, and reviews through blogs, forums and other similar features available from time to time through the Websites, the Apps, the Platform and the Services. None of the information you provide through the use of these features is protected by this Privacy Policy including any personal information. THIS PRIVACY POLICY DOES NOT APPLY TO ANY INFORMATION (INCLUDING

PERSONAL INFORMATION) THAT YOU PROVIDE USING ANY SUCH FEATURES. ALL SUCH INFORMATION IS PUBLIC INFORMATION AND MAY BE VIEWED, COLLECTED, USED, MODIFIED AND/OR DISCLOSED FOR ANY PURPOSE BY US AND THE PUBLIC.

Accessing and Modifying Personal Information and Communication Preferences

You may access, review, and make changes to your personal information by following the instructions found on the Websites, the Platform, the Apps, the Services or by contacting us at info@theincometaxschool.com. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any our marketing email. You cannot opt out of receiving transactional e-mails related to their account. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

Security of Your Information

We take commercially reasonable security measures to ensure that your information is treated securely and is protected from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in processing and the nature of such data, and in compliance with applicable laws and regulations. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. In particular, e-mail sent to or from the Websites, the Apps, the Platform, and/or the Services may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail or other electronic means. We do not accept liability for unintentional disclosure of your information.

Links to Third-Party Sites

The Websites, the Apps, the Platform and the Services may, from time to time, contain links to external websites. We encourage you to review the privacy and security policies of any externally linked websites that may be accessed through the Websites, the Apps, the Platform or the Services. We assume no responsibility or liability for the information collection and disclosure practices of any external websites that a user can access through the Websites, the Apps, the Platform or the Services. Please check the privacy policies of these external websites before you submit any personal information to them.

Children's Privacy

We do not knowingly collect, receive, maintain, or use personal information from children under 18 years of age, and no part of any of the Website, the App, the Platform and/or the Services is directed to children under the age of 18. If you are under the age of 18, please do not provide any personal information through the Websites, the App, the Platform and/or the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Privacy Policy by instructing their children to never provide any personal information on the Websites, the Apps, the Platform, the Services, or any other web site without their permission. If you learn that your child has provided us with personal information without your consent, you may alert us at info@theincometaxschool.com and we will endeavor to delete that information from

our databases If we learn that we have collected any personal information from children under 18, we will promptly take steps to delete such information and terminate the child's account.

DO NOT TRACK

As discussed above, third parties such as advertising networks and analytics providers may collect information about your online activities over time and across different websites when you access or use the Websites, the Apps, the Platform and/or the Services. Currently, various browsers offer a "Do Not Track" option, but there is no standard for commercial websites. At this time, we do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

Important Notice to All Non-U.S. Residents

Our servers are located in the United States. Please be aware that your information, including your personal information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use Websites, the Apps, the Platform, or the Services, you do so at your own risk.

Notice to California Residents

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at info@theincometaxschool.com

Notice to Nevada Residents

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal data to third parties. You can exercise this right by contacting us at info@theincometaxschool.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note, however, that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

Changes to Our Privacy Policy and Practices.

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may revise this Privacy Policy from time to time, so review it periodically. We will post any changes to the Privacy Policy on the Websites, the Apps, the Platform and/or the Services, and the revised Privacy Policy will be effective when it is posted. By visiting any Website, accessing and/or using any of the App, the Platform and/or the Services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

Contact Us

If you have any questions about this Privacy Policy or to report a privacy issue, please contact us in one of the following ways:

Email: info@theincometaxschool.com

Or write to us at:

201 N King of Prussia Rd, Suite 370 Radnor, PA 19087