

**Trilogyed.com Privacy Policy**  
**Last Revised: August 1, 2018**

Trilogy Education Services, Inc. (“Trilogy”, “we” or “us”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect from users of our website, located at trilogyed.com (the “Site” and online services, the “Services”).

1. **Questions; Contacting Trilogy; Reporting Violations.** If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or email:

Trilogy Education Services, Inc.  
105 East 34th Street #225  
Suite 225  
New York, New York 10016  
Attention: Privacy  
privacy@trilogyed.com

2. **User Consent.** By submitting Personal Data through our Site, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.
3. **A Note to Users Outside of the United States.** If you are a non-U.S. user of the Site, by visiting the Site and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such transfer.
4. **Types of Data We Collect.** “Personal Data” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. “Anonymous Data” means data that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data, as described below.

**(a) Information You Provide to Us.**

- We may collect Personal Data from you, such as your first and last name, e-mail address, professional title, and company name, in order for you to access certain features of the Site or Services. If you use our Services on your mobile device, we may collect your phone number and the unique device id number.

- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- When you post content (text, images, comments or any other kind of content) on our Site, the information contained in your posting will be stored in our servers and other users will be able to see it. In connection with any posted content we may collect and post your name, job title, institutional affiliation or other information and include this information in your post.
- We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding support for the Services.

**(b) Facebook and other Social Networking Sites.** The Services allow users to access Facebook and other social networking sites (collectively, “SNS”) to interact with friends and to share through walls and news feeds. Once you connect with an SNS, your use of the SNS is governed by the SNS’s terms and privacy. Any information that we collect from Facebook or other SNS account may depend on the privacy settings you have with that SNS, so please consult the SNS’s privacy and data practices.

**(c) Information Collected via Technology.**

- Information Collected by Our Servers. To make our Site more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your device and device type, browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
- Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, and gather demographic information about our user base as a whole. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.
- Cookies. Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you.
- Pixel Tags. In addition, we use “Pixel Tags” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that

are used to track online movements of Web users. In contrast to Cookies, which are stored on a user's computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users' Personal Data.

- **How We Respond to Do Not Track Signals.** We do not currently respond to “do not track” signals or other mechanisms that might enable Users to opt out of tracking on our site.
- **Videos.** When you watch a video on the Site, we may collect additional information about the video player and how you view the video, including collection of an IP address that may be associated with your location and information about what video you watched and for how long you watched it.
- **Flash LSOs.** When we post videos, third parties may use local shared objects, known as “Flash Cookies,” to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from browser Cookies because of the amount and type of data and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, click here: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html).
- **Analytics Services.** In addition to the tracking technologies we place, other companies may set their own cookies or similar tools when you visit our Site. This includes third party analytics services, including but not limited to Google Analytics (“Analytics Services”), that we engage to help analyze how users use the Site, as well as third parties that deliver content or offers. We may receive reports based on these parties' use of these tools on an individual or aggregate basis. We use the information we get from Analytics Services only to improve our Site. The information generated by the Cookies or other technologies about your use of our Site (the “Analytics Information”) is transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity. The Analytics Services may also transfer information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Services' ability to use and share Analytics Information is restricted by such Analytics Services' Terms of Use and Privacy Policy. By using our Site, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above and otherwise in conformance with the Analytics Services privacy policy. For a full list of Analytics Services, please contact us at [privacy@trilogyed.com](mailto:privacy@trilogyed.com).

## 5. Use of Your Personal Data

(a) **General Use.** In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:

- facilitate your use of the Site;
- identify you as a user in our system;
- provide improved administration of our Site and Services;
- provide the Services you request;
- improve the quality of experience when you interact with our Site and Services;
- send you administrative e-mail notifications, such as security or support and maintenance advisories;
- respond to your inquiries related to employment opportunities or other requests, and
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of Trilogy.

**(b) Creation of Anonymous Data.** We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our Services and improve Site navigation. We reserve the right to use Anonymous Data and aggregated and other de-identified information for any purpose and disclose Anonymous Data to third parties in our sole discretion.

6. **Disclosure of Your Personal Data.** We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

**(a) Users.** We will share your Personal Data with other Users solely for the purpose of providing services related to the summit.

**(b) Third Party Service Providers.** We may share your Personal Data with third party service providers to: provide you with services offered through our Site; to conduct quality assurance testing; provide technical support; and/or to provide other services to Trilogy. These third party service providers are required not to use your Personal Data other than to provide the services requested by Trilogy.

**(c) Affiliates.** We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy.

**(d) Corporate Restructuring.** We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

**(e) Other Disclosures.** Regardless of any choices you make regarding your Personal Data (as described below), Trilogy may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Trilogy; (c) to protect or defend the rights or

property of Trilogy or users of the Site; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

7. **Third Party Websites.** Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site, and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.
8. **Your Choices Regarding Information.** You have several choices regarding the use of information submitted to our Site:
  - (a) **Email Communications.** We will periodically send you free newsletters and e-mails that directly promote Trilogy, including our Services, events and activities. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.
  - (b) **Cookies.** If you decide at any time that you no longer wish to accept Cookies from our Service for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser’s technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Service or all functionality of the Service. If you have any questions about how to disable or modify Cookies, please let us know using the contact information provided in Section 1.1 above.
  - (c) **Changing or Deleting Your Personal Data.** All users may review, update, correct or delete their Personal Data by contacting us. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.
9. **Changes to This Privacy Policy.** This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy on the Site and we will change the “Last Revised” date above. You should consult this Privacy Policy regularly for any changes.