

VLC Privacy Policy

Last Updated: June 28, 2007

Introduction and Scope

Vertical Learning Curve (“VLC”) is committed to protecting your privacy. This Privacy Policy applies to all products, services, and websites owned and operated by VLC (“VLC services”). Herein, “you” and “your” refers to users of VLC services; “we” and “our” refers to VLC systems and employees. This policy does **not** apply to licensed VLC Providers (also known as “Distributors”) worldwide. These Providers are separate business entities, not subsidiaries or affiliated companies of VLC.

VLC encourages you to review all applicable privacy policies, and to be extremely cautious in submitting any information to a third party. VLC does not exercise control over external sites or documents displayed as links from within our services.

These other sites may place their own cookies or other files on your computer, collect data, or solicit personal information from you. In addition, please see our [Terms of Use](#).

Information You Provide

VLC offers services that require registration with us. When necessary, we may ask for personal information (i.e., name, e-mail address, password, location, etc.). We store this information on secure servers, and do not distribute or sell this information with any entities, except to licensed VLC Providers or Universities **as authorized** by individual users.

VLC does **not** collect financial/banking information such as account numbers, routing symbols, or credit card numbers. In addition, VLC does **not** collect government-assigned information (such as military ID or social security numbers) or confidential medical or political information.

We may collect information about your website visits, including the pages you view, the links you click and other actions taken in connection with VLC services. We may also collect certain standard information that your internet browser sends to every website you visit (i.e., IP address and its general geographic

area, browser type/language, access times, and referring website addresses).

We will attempt to satisfy any applicable law, regulation, legal process, or enforceable governmental requests including subpoenas and court orders. In addition, we will act pursuant to enforcing applicable Terms of Use including: investigation of potential violations thereof; fraud detection and/or prevention; security or technical issue resolution; and protection against imminent harm to the rights, property, or safety of VLC, its users, or the public as required or permitted by law.

You can decline to submit personal information to any of our services, in which case VLC may not be able to provide those services to you.

Use of Cookies

We may use one or more cookies (small text files placed on your computer hard disk by a web page server). We use cookies to uniquely identify your browser, track user trends, and improve the quality and convenience of some of our services. Most browsers accept cookies by default, but you may change your browser settings. Some VLC services may not function properly if cookies are disabled.

Communications

When you send email or other communication to VLC, we may retain those communications in order to process your inquiries, respond to your requests, and improve our services. You may receive replies to support requests, newsletters, or occasional promotional e-mail from VLC.

Links and Redirected URLs

VLC may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our services and advertising. In addition to the above purposes in processing personal information, VLC may process information for such

purposes including: providing VLC services to users, including the display of customized content and advertising; auditing, research and analysis in order to maintain, protect, and improve our services; ensuring the technical functioning of our network; and developing new services.

VLC processes personal information on our servers in the United States of America and in other countries. In some cases, we process personal information on a server outside your own country. We may process personal information to provide our own services.

If VLC becomes involved in a merger, acquisition, or any form of sale of some or all of its data assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users who clicked on a particular advertisement. Such information does not identify you individually.

Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to the limited-access systems where we store personal data.

We restrict access to personal information to VLC employees, contractors, and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

If a password is used to help protect your accounts and personal information, it is **your** responsibility to keep your password confidential. Do not share this information with anyone. If you are sharing a computer with anyone you should always choose

to log out before leaving a site or service to protect access to your information from subsequent users.

Data integrity

VLC processes personal information only for the purposes for which it was collected and in accordance with this Policy. We review our data collection, storage, and processing practices to ensure that we only collect, store, and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

When you use VLC services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected, or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

It is VLC policy to attempt to resolve all user complaints and concerns. We will cooperate with the appropriate regulatory authorities as able, to resolve any complaints regarding the transfer of personal data that cannot be resolved between VLC and an individual.

Changes to this policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Policy changes and, if the

changes are significant, we will provide a more prominent notice. Each version of this Policy will be identified by date.

If you have any questions or comments about this Privacy Policy or the management and use of information at VLC, please contact us by e-mail (support@VLCglobal.com) or through our website (<http://www.VLCglobal.com/support>).

VLC PRIVACY

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