

# Global Learning Systems (“GLS”) Privacy Policy

## Overview

This privacy policy applies to the privacy practices for [www.globallearningsystems.com](http://www.globallearningsystems.com), [www.keystoneondemand.com](http://www.keystoneondemand.com) and [www.keystonelearning.com](http://www.keystonelearning.com) (collectively referred to as ‘website’) and owned and operated by Global Learning Systems, and its affiliates Keystone Learning Systems and Bancroft Technology Group. This privacy policy describes how Global Learning Systems (“GLS”, “we”, “our”, “us”) collects and uses the personal information a user or “you” provide on our web site. 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

GLS is the sole owner 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. GLS will not sell, share or rent this information to others in ways different from what is disclosed in this statement. 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.

GLS 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).

GLS 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**

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 GLS, you may opt-out of receiving them by following the instructions included in each communication or contact us via our website.

## **Security**

GLS takes precautions to protect your information both online and off-line. All such user information is restricted in our offices, where 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 GLS 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.

## **Swiss-U.S. Privacy Shield Frameworks**

GLS complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union and Switzerland to the United States, respectively. GLS has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms 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 GLS' certification, please visit <http://www.privacyshield.gov/>.

In compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Principles, GLS commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact GLS Erica Smith at GLS: [erica.smith@globallearningsystems.com](mailto:erica.smith@globallearningsystems.com).

GLS will address unresolved privacy complaints under the Swiss-U.S. Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, 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 GLS, please visit the BBB EU PRIVACY SHIELD web site at [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint.

## **Changes to This Privacy Statement**

We reserve the right to modify this privacy statement at any time, as determined by GLS. 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 GLS 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](mailto:info@globallearningsystems.com)

Effective date: 07/24/2017.