



CORPORATE PRIVACY POLICY BUSINESS PROCESS REFERENCE

MAR 29, 2019

PURPOSE

The Purpose of this BPR is to describe the Corporate Privacy Policy. This BPR will be used as the reference for proper execution and application of Privacy Policy.

ARX NIMBUS ONLINE PRIVACY STATEMENT

Arx Nimbus LLC (collectively "Arx Nimbus") is committed to protecting your privacy and providing you with a positive experience on our websites and in using our products and services ("Solution" or "Solutions").

This Privacy Statement applies to Arx Nimbus websites and Solutions that link to or reference this Statement and describes how we handle personal information and the choices available to you regarding collection, use, access, and how to update and correct your personal information. Additional information on our personal information practices may be provided in offer descriptions, supplemental privacy statements, or notices provided prior to or at the time of data collection.

COLLECTION OF YOUR PERSONAL INFORMATION

We may collect data, including personal information, about you as you use our websites and Solutions and interact with us. "Personal information" is any information that can be used to identify an individual, and may include name, address, email address, phone number, login information (account number, password), marketing preferences, social media account information, or payment card number. If we link other data with your personal information, we will treat that linked data as personal information. We also collect personal information from trusted third-party sources and engage third parties to collect personal information to assist us.

We collect personal information for a variety of reasons, such as:

- Processing your order, including payment transactions.
- Providing you with a newsletter subscription.
- Sending marketing communications.
- Creating an account.
- Enabling the use of certain features of our Solutions.
- Personalizing your experience.
- Providing customer service.
- Managing a job application.
- Collecting information during the testing admissions process when a computer-based certification test is administered to you.

We and the third parties we engage may combine the information we collect from you over time and across our websites and Solutions with information obtained from other sources. This helps us improve its overall accuracy and completeness, and also helps us better tailor our interactions with you.

If you choose to provide Arx Nimbus with a third party's personal information (such as name, email, and phone number), you represent that you have the third party's permission to do so. Examples include forwarding reference or marketing material to a friend or sending job referrals. Third parties may unsubscribe from any future communication following the link provided in the initial message or

contacting info@ArxNimbus.com. In some instances, Arx Nimbus and the third parties we engage may automatically collect data through cookies, web logs, web beacons, and other similar applications. This information is used to better understand and improve the usability, performance, and effectiveness of the website and to help tailor content or offers for you.

USES OF YOUR PERSONAL INFORMATION

We may use your personal information for the purposes of operating our business, delivering, improving, and customizing our websites and Solutions, sending marketing and other communications related to our business, and for other legitimate purposes permitted by applicable law. Some of the ways we may use personal information include:

- Delivering a Solution you have requested.
- Analyzing, supporting, and improving our Solutions and your online experience.
- Personalizing websites, newsletters and other communications.
- Administering and processing your certification exams.
- Sending communications to you, including for marketing or customer satisfaction purposes, either directly from Arx Nimbus or from our partners.

You can edit your communication preferences at any time. See Your Choices and Selecting Your Communication Preferences below.

ACCESS TO AND ACCURACY OF YOUR PERSONAL INFORMATION

We need your help in keeping your personal information accurate and up to date. We provide a number of options to access, correct, suppress, or delete your personal information:

- Some Arx Nimbus entities may act as or be considered "data controllers". When a Arx Nimbus entity is acting as a data controller, you can exercise your rights of access and request corrections, suppression, or deactivations under applicable data

protection laws directly with that Arx Nimbus entity as described in the specific Solution documentation.

- If you need additional assistance, or help with accessing, correcting, suppressing, or deleting your personal information, please feel free to contact us directly. We make good faith efforts to honor reasonable requests to access, delete, update, suppress, or correct your data. We will respond to your request within 30 days. If we are unable to honor your request, we will provide you with an explanation.

YOUR CHOICES AND SELECTING YOUR COMMUNICATION PREFERENCES

We give you the choice of receiving a variety of information related to our Solutions. You can manage your communication preferences through the following methods:

- By following the instructions included in each promotional email from us to unsubscribe from that particular mailing.
- By sending us a message through email at info@arxnimbus.com. Please be sure to include your name, email address, and specific, relevant information about the material you no longer wish to receive.
- For short message services ("SMS Services"), by replying "STOP", "END", or "QUIT" to the SMS text message you have received.

These choices do not apply to service notifications or other required communications that are considered part of certain Solutions, which you may receive periodically unless you stop using or cancel the Solution in accordance with its terms and conditions. With your permission, we may also share your personal information with Arx Nimbus business partners or vendors, so they may send you information about products or services that may be of interest to you.

By using our websites, Solutions, or otherwise providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use. For example, if we learn of a security system's breach, we may attempt to notify you

electronically by posting a notice on our websites, by sending an email, or otherwise contacting you.

SHARING YOUR PERSONAL INFORMATION

We may share your personal information with third parties for the purposes of operating our business, delivering, improving, and customizing our Solutions, sending marketing and other communications related to our business, and for other legitimate purposes permitted by applicable law or otherwise with your consent.

We may share personal information in the following ways:

- Within Arx Nimbus and any of our worldwide subsidiaries for purposes of data processing or storage.
- With Arx Nimbus business partners or vendors, so that they may share information with you about their products or services.
- With business partners, service vendors, authorized third-party agents, or contractors to provide a requested Solution, service or transaction. Examples include, but are not limited to: processing of orders and credit card transactions, hosting websites, hosting seminar registration, assisting with sales-related efforts or post-sales support, and providing customer support.
- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.
- In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation or legal process.
- With law enforcement officials, government authorities, or other third parties as necessary to comply with legal process or meet national security requirements; protect the rights, property, or safety of Arx Nimbus, its business partners, you, or others; or as otherwise required by applicable law.
- In aggregated and/or anonymized form which cannot reasonably be used to identify you.

- If we otherwise notify you and you consent to the sharing.

SECURITY OF YOUR PERSONAL INFORMATION

We intend to protect the personal information entrusted to us and treat it securely in accordance with this Privacy Statement. Arx Nimbus implements physical, administrative, and technical safeguards designed to protect your personal information from unauthorized access, use, or disclosure. We also contractually require that our suppliers protect such information from unauthorized access, use, and disclosure. The Internet, however, cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any personal information you provide to us.

RETENTION OF PERSONAL INFORMATION

We will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements.

USE OF COOKIES AND OTHER WEB TECHNOLOGIES

Like many websites, Arx Nimbus uses automatic data collection tools, such as cookies, embedded web links, and web beacons. These tools collect certain standard information that your browser sends to our website. Examples include your browser type and the address of the website from which you arrived at our website.

They may also collect information about:

- Your Internet Protocol (IP) address. This is a number automatically assigned to your computer or device whenever you connect to the Internet. It is a unique address assigned by your Internet service provider or IT department on a TCP/IP network. Among other things, the IP address allows web servers to locate and identify your device.
- Clickstream behavior. This includes, for example, the pages you view and the links you click. These tools help make your visit to our website easier, more efficient, and more valuable by providing you

with a customized experience and recognizing you when you return.

Our website includes widgets. Widgets are interactive mini-programs that run on our site to provide specific services from other companies. Examples include displays of news, opinions, videos, and more. Personal information, such as your email address, may be collected through widgets. Widgets may also set cookies to enable them to function properly. Information collected by a widget is governed by the privacy policy of the company that created the widget.

Some web browsers may give you the ability to enable a "do not track" feature that sends signals to the websites you visit, indicating that you do not want your online activities tracked. This is different from blocking or deleting cookies, as browsers with a "do not track" feature enabled may still accept cookies.

No industry standard currently exists on how companies should respond to "do not track" signals, although one may develop in the future. Arx Nimbus websites do not currently recognize and respond to "do not track" signals. If we do in the future, we will describe how in this Privacy Statement.

We partner with third parties to display advertising on our website or to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies in order to provide you with advertising based on your browsing activities and interests. You may opt out of this advertising.

LINKED WEBSITES

We may provide links to other third-party websites and services that are outside our control and not covered by this Privacy Statement. We encourage you to review the privacy statements posted on those websites (and all websites) you visit.

FORUMS AND CHAT ROOMS

If you participate in a discussion forum, local communities, or chat room on an Arx Nimbus website, you should be aware that the information you provide there (i.e. your public profile) will be made broadly available to others, and could be

used to contact you, send you unsolicited messages, or for purposes neither Arx Nimbus nor you have control over. Also, please recognize that individual forums and chat rooms may have additional rules and conditions. Arx Nimbus is not responsible for the personal information or any other information you choose to submit in these forums. To request removal of your personal information from our blog or community forum, contact us at info@ArxNimbus.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

CHILDREN'S PRIVACY

Arx Nimbus encourages parents and guardians to take an active role in their children's online activities. Arx Nimbus does not knowingly collect personal information from children without appropriate parental or guardian consent. If you believe that we may have collected personal information from someone under the applicable age of consent in your country without proper consent, please let us know using the methods described in the Contact Us section and we will take appropriate measures to investigate and address the issue promptly.

CONSENT TO TRANSFER, PROCESSING AND STORAGE OF PERSONAL INFORMATION

As Arx Nimbus is a global organization, we may transfer your personal information to Arx Nimbus in the United States of America, to any Arx Nimbus subsidiary worldwide, or to third parties and business partners as described above that are located in various countries around the world. By using our websites and Solutions or providing any personal information to us, where applicable law permits, you consent to the transfer, processing, and storage of such information outside of your country of residence where data protection standards may be different.

YOUR CALIFORNIA PRIVACY RIGHTS

Residents of the State of California, under California Civil Code § 1798.83, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed personal information during the

preceding year for direct marketing purposes. Alternatively, the law provides that if the company has a privacy policy that gives either an opt-out or opt-in choice for use of your personal information by third parties (such as advertisers) for marketing purposes, the company may instead provide you with information on how to exercise your disclosure choice options.

Arx Nimbus qualifies for the alternative option. We have a comprehensive privacy statement, and provide you with details on how you may either opt-out or opt-in to the use of your personal information by third parties for direct marketing purposes. Therefore, we are not required to maintain or disclose a list of the third parties that received your personal information for marketing purposes during the preceding year.

If you are a California resident and request information about how to exercise your third party disclosure choices, please email us your request at info@arxnimbus.com.

GENERAL DATA PROTECTION REGULATION (GDPR) NOTICE

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please contact us by emailing info@ArxNimbus.com.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you.
- The right of rectification.
- The right to object.
- The right of restriction.
- The right to data portability
- The right to withdraw consent

HOW TO CONTACT US

We value your opinions. Should you have questions or comments related to this Privacy Statement, please email us at info@ArxNimbus.com.

UPDATES TO THIS ARX NIMBUS PRIVACY STATEMENT

We may update this Privacy Statement from time to time. If we modify our Privacy Statement, we will post the revised version here, with an updated revision date. You agree to visit these pages periodically to be aware of and review any such revisions. If we make material changes to our Privacy Statement, we may also notify you by other means prior to the changes taking effect, such as by posting a notice on our websites or sending you a notification. By continuing to use our website after such revisions are in effect, you accept and agree to the revisions and to abide by them.

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