Privacy Policy

Effective on: July 12, 2019

EBLI is committed to protecting your privacy while allowing you to use the Site (defined below). By accessing or using the Site you agree to the terms of this privacy policy ("Privacy Policy"), as described below. If you do not agree to these terms, please do not access or use this Site.

1. DEFINITIONS

A. “You” and “your” mean the individual or entity visiting or using the Site.
B. “EBLI”, “we,” “us” and “our” means Teach the World to Read, LLC d/b/a EBLI.
C. “Site” refers to EBLI’s website at www.ebli.com, and other related websites, blogs, domains, and mobile sites maintained by EBLI.
D. “Non-Personal Information” is any information that is not Personally Identifiable Information (defined below). Non-Personal Information includes, without limitation, Personally Identifiable Information that has been anonymized.
E. “Personally Identifiable Information” or “PII” is non-public information we receive from your use of the Site that can be used, alone or in combination with other information in our possession, to identify a particular person/individual. It may include information such as name, address, telephone number and other personal information you provide us.
F. “Data” includes both Non-Personal Information and Personally Identifiable Information.

2. INFORMATION COLLECTED AND CONSENT

You do not have to provide any Personally Identifiable Information to browse the publicly available pages of the Site; however, in order to use certain services, including without limitation, the registration for on-line training, registration for newsletters and updates, and other services through the Site (collectively, the “Service”), you may be required to register and provide Personally Identifiable Information, including, without limitation, financial information for the payment of the Service.

We may collect PII from you in a variety of ways, including, but not limited to, when you visit the Site, register on the Site, when you provide PII in connection with other activities, Service, features or resources we make available on the Site, or when you complete a transaction on the Site. We may collect your name, birth date, employment information, mailing address, billing address, phone number, payment information, or email address. We may also collect additional information from you depending on the nature of the transaction.

EBLI also collects information about you automatically when you visit the Site. We automatically receive certain information from your browser or mobile device, such as your browser type, the operating system of your device, the URL of the site from which you came and the URL of the site you visit when leaving the Site. We also receive your IP address and the name of your internet service provider ("ISP") or your mobile carrier. Depending on your device’s settings, we may also receive location data and other types of information sent from third-party services or GPS-enabled devices. As you use the Site, we may also collect information about such usage and your actions on the Site, such as pages you viewed, access times, and how long you spent on a page. We may use cookies to collect such information, as described in more detail below. This information is considered Non-Personal
Information, which we can use for any purpose, including, without limitation, to help us improve the Site and to enhance your and other users’ experience. We may also convert PII into Non-Personal Information by excluding information that is personally identifiable. You acknowledge that Non-Personal Information and PII that is converted into Non-Personal Information belongs to EBLI and that EBLI has the right to use such general information as it determines in its sole discretion.

Notwithstanding the foregoing, we will treat as PII any item that, either alone or together with other information, we could use to identify an individual. Except as described below in this section and in the “When We May Disclose Your Information” section below, we will not share with third parties the link between your IP address and your PII without your permission.

By providing your PII to us, you explicitly agree to our collection and use of such information as described in this Privacy Policy. By providing PII belonging to a student, you expressly represent and warrant that you have the authority and right to do so, and that you obtained all appropriate and required consents.

We will only use PII for the purpose of fulfilling our duties and providing the Service and for improving services. EBLI may use PII for the following purposes:

A. To improve customer service: Your information helps us to more effectively respond to your customer service requests and support needs.

B. To personalize user experience: We may use information in the aggregate to understand how our users as a group use the Services and resources provided on the Site.

C. To improve the Site: We continually strive to improve our website offerings based on the information and feedback we receive from you.

D. To provide products or services and to process transactions: Except as otherwise expressly provided in this Privacy Policy, we will use Data only for the purpose of fulfilling our duties and providing the Service. EBLI may use Non-Personal Information for product development, research, or other purposes. We may use the information that you provide about yourself when placing or fulfilling an order for products or services. We do not share this information with outside parties except to the extent necessary to provide the Service.

E. To send periodic emails: The email address you provide for the Service will only be used to send you information and updates pertaining to products or services requested. It may also be used to respond to your inquiries, and/or other requests or questions.

F. To develop new products or services: We use your PII and Non-Personal Information for research and commercial purposes. The information we collect may be used to develop new products or services. Except as otherwise provided in this Privacy Policy, we may use your PII and Non-Personal Information internally or, among other things, to offer our own or third party products and services. Only EBLI, its subsidiaries, its suppliers and contractors involved in distributing the new product or service will have access to your PII. Our subsidiaries, suppliers and contractors will be required to use any PII we provide to them only for that intended purpose and subject to the terms of this Privacy Policy.
G. **For marketing:** Except as otherwise expressly provided for in this Privacy Policy or except as prohibited by applicable law, EBLI may use your PII and Non-Personal Information to enhance its networking, marketing, social, and recruiting activities, and for other similar business purposes. We may also use Personally Identifiable Information to provide you information regarding new products or services. Personally Identifiable Information is not shared with entities outside of EBLI other than service providers who assist us in carrying out these business functions.

H. **Compliance with applicable law:** We may disclose your PII as we may in our sole discretion determine is necessary or reasonably required to comply with the law, applicable regulations, court orders or subpoenas, to enforce any terms of use or contractual rights or obligations, or to protect our rights, property or safety, or the rights, property or safety of others.

I. **Change in the Site Ownership:** If ownership of the Site changes, whether in whole or in part, information collected through the Site about you may be transferred to the new owner so the Site and any service provided through or related to the Site can continue. In that case, your user information would remain subject to the terms and conditions of the applicable version of the Privacy Policy.

3. **WEB BROWSER COOKIES**

The Site may send a “cookie” to your computer. A cookie is a small piece of data sent to your browser from a web server and stored on your computer’s hard drive. A cookie cannot read data off your hard disk or read cookie files created by other sites. Cookies do not damage your system. Cookies allow us to recognize you as a user when you return to the Site using the same computer and web browser. We use cookies to identify which areas of the Site you have visited. We also may use this information to better personalize the content you see on the Site. EBLI does not store unencrypted Personally Identifiable Information in the cookies. We also do not link Non-Personal Information from cookies to your Personally Identifiable Information.

To help us optimize the Site or for marketing purposes, we may allow other authorized third parties to place or recognize unique cookies on your browser. Any information provided to third parties through cookies will be for enhancing your user experience by providing more relevant marketing. Third-party services and tools we use, which may send cookies to users of the Site and may collect information from users, includes:

- **Google Analytics and Double Click (referred to as “Google”):** Google collects anonymous data (ad views, analytics, browser information, cookie data, date/time, demographic data, hardware/software type, internet service provider, interaction data, page views, and serving domains), pseudonymous data (IP Address (EU PII), Device ID (EU PII), PII (name, address, phone number, email address, login, EU-IP address, EU-unique device ID), and sensitive data (financial information). Aggregate data, anonymous data, PII data and sensitive data are shared by Google with third party parties. We use the information we get from Google only to improve the Site and for marketing purposes. Google collects only the IP address assigned to you on the date you visit this website, rather than your name or other identifying information. You can review Google’s privacy policy at [https://www.google.com/policies/privacy/](https://www.google.com/policies/privacy/). Although Google plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this website, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google about your visits to the Site is restricted by the Google Terms of Use and the Google Privacy Policy. You can prevent Google from recognizing you on return visits...
Some browsers may allow you to manage the storage of cookies on your device. If supported by your browser, you may set your browser to refuse all cookies (or, sometimes all third-party cookies) or to alert you when a cookie is placed. However, if you select these settings, you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting to refuse cookies, the Site will issue cookies. For more information about how to manage your cookies preferences, use the ‘help’ menu of your web browser or explore the customer support sections of your web browser. To opt-out of all cookies or certain advertising cookies, visit the company website for your browser for instructions.

Here are links to some browsers’ websites:

- Google Chrome: www.google.com
- Internet Explorer: support.microsoft.com
- Mozilla Firefox: support.mozilla.org
- Safari: support.apple.com
- Opera: www.opera.com

4. SECURITY

We will use commercially reasonable methods to keep personal information securely in our files and systems.

5. DO NOT TRACK

Your browser may provide you with the option to send a “Do Not Track” signal to websites you visit. This signal is used to request that websites not send the requesting device cookies, but websites have no obligation to respond to such signal or to modify their operation. At the current time, the Site is not programmed to recognize Do Not Track signals, so the Site will not treat you differently if we receive such signals from your browser and we may not comply with Do Not Track settings on your browser.

6. EXEMPTIONS FROM THE PRIVACY POLICY

Our Privacy Policy does not apply to any information you may send to EBLI by email or instant messaging programs (e.g., AOL, Yahoo, etc.), or through social media networks, even if you open such programs or services by clicking a link displayed on the Site. Email, social media, and instant messages are not recognized as secure communication forms. Please do not send any information you consider private to us by email or instant message or through social media sites (e.g., Twitter, Facebook, etc.) due to the public nature of such postings.

7. LINKS TO OTHER SITES

The Site may contain links to other websites. EBLI is not responsible for the actions, practices, or content of websites linked to or from the Site. You understand such websites may require you to agree to their terms of use and that we have no control over these terms. As always, you understand it is your responsibility to verify your legal use of a website, and use of information from the website with the corresponding website owner.
8. **AGE OF CONSENT**

EBLI takes special care to protect the privacy needs of children under the age of 13 and we encourage parents to be an active participant in their child’s online activities. EBLI abides by the Children’s Online Privacy Protection Act (COPPA) and other relevant laws. The Site does not target and is not intended for children under the age of 13, and EBLI will not knowingly collect Personally Identifiable Information directly from them. If EBLI discovers that a child has provided personal data directly through the Site, EBLI will eliminate that data. This Site is only intended for persons 18 years of age or older. If you are under 18 you must ask a parent or legal guardian for permission prior to submitting any information to this Site.

If you have knowledge that a child 13 years of age or younger has submitted Personally Identifiable Information to us, please contact us and we will delete the PII information collected belonging to that child. You may contact us via email or by writing to us at the address below. Parents and guardians can also email us at info@ebli.com, but before any information is disclosed, the parent will be required to provide the parent's name and email address for verification. We will only send the information to the parent email address in the registration file.

9. **SCHOOL PRIVACY POLICIES**

EBLI may contract directly with schools or school districts. Thus, this Privacy Policy does not govern how a school might collect, use, or disclose student or teacher information. Please consult with your school for information about their specific privacy practices if you have any questions or concerns.

10. **CAN-SPAM COMPLIANCE NOTICE**

EBLI fully complies with the federal CAN-SPAM Act. You can always opt out of receipt of further email correspondence from us.

11. **CALIFORNIA PRIVACY RIGHTS**

Under Section 1798.83 of the California Civil Code, residents of California can obtain certain information from companies with whom they have an established business relationship. That information is about the Personally Identifiable Information those companies have shared with third parties for direct marketing purposes during the preceding calendar year. The law requires companies to inform consumers about the categories of Personally Identifiable Information shared with third parties, the names and addresses of those third parties, and examples of the services or products marketed by those third parties. To request a copy of the information disclosure provided by EBLI under Section 1798.83 of the California Civil Code, please contact us via email to info@ebli.com.

12. **ACCESS**

If you are an individual, you may have certain rights under applicable data protection legislation, including the right to review and correct the personal data we hold about you. Unless you reside in California or another jurisdiction that requires us to provide the information without charge, we may charge you a fee to receive a copy of this data. For a copy of or reasonable access to your personal data please contact us at info@ebli.com.
13. **MESSAGE CONTENT**
We do not monitor, review, or exercise any control over the materials provided when using the Site or our Service (though we reserve the right to block resources that we reasonably believe may subject us or our users to liability).

14. **AMENDMENTS**

EBLI reserves the right to change the Privacy Policy from time to time at its sole discretion with or without notice. Any revisions are effective immediately once posted on the Site. Your continued use of the Site shall indicate your acceptance of the revision.

15. **INCORPORATION OF AGREEMENTS**

If you have entered into an online agreement with EBLI for training, those terms establishing the use, disclaimers, and limitations of liability governing the Site, are incorporated into this Privacy Policy by reference. The terms of those agreements supersede conflicting terms in this Privacy Policy to the extent permitted by law. Defined terms in those agreements will have the same meaning in this Privacy Policy, unless otherwise defined herein.

16. **EUROPEAN UNION DISCLOSURE**

Personal information voluntarily submitted to EBLI online, via electronic communication, or otherwise, may be maintained or accessed in servers or files in the United States of America, which the European Union has not deemed to provide “adequate” privacy protection. If you do not consent to having your information processed and stored in the United States of America, please do not provide it to EBLI.

17. **RETENTION OF INFORMATION**

EBLI will retain your information for as long as necessary to fulfill any of the uses identified in this Privacy Policy or to comply with applicable legal obligations.

**CONTACT**

If you have any questions about the Privacy Policy, please contact us at info@ebli.com or by mail at:

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