Sootchy Learning Exchange Privacy Policy

PLEASE NOTE OUR PRIVACY POLICY RELATED TO CHILDREN UNDER THE AGE OF 13 CAN BE FOUND IN SECTION 7 ON THIS DOCUMENT.

Sootchy Learning Exchange LLC, Sootchy Inc., Sootchy Securities, LLC and such entities' officers, directors, employees, agents, members, managers, successors, assigns, predecessors, group companies, affiliates and subsidiaries from time-to-time (collectively referred to herein as "we", "us", "our", or "Sootchy,") are committed to protecting your privacy.

This online Sootchy Learning Exchange Privacy Policy ("Privacy Policy" or "Policy") describes how we gather and use your personal information. This Sootchy Learning Exchange Privacy Policy applies to our mobile application, web application (together, the "App") and website as well the investment advisory services provided by Sootchy Securities (collectively, our "Service(s)"), and describes our practices relating to the collection, recording, use and disclosure of personal information collected from or about our current and past clients, website visitors, mobile application users and other individuals. By accessing or using our Service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in our general Privacy Policy and Terms of Use. In this Sootchy Learning Exchange Privacy Policy, personal information means "personally identifiable information." This Sootchy Learning Exchange Privacy Policy will be reviewed periodically and will be updated to reflect any changes.

Sootchy provides a range of services, including, without limitation, insurance-related services, investment-related services, and, where applicable, services relating to 529 Plans and other financial products or programs (collectively, the "Services"). In connection with the provision, administration, improvement, and support of the Services, Sootchy and its affiliated companies may collect, process, use, store, and otherwise handle users' personal information in accordance with this Privacy Policy and applicable law.

By accessing or using the Services, you acknowledge and agree that personal information collected from or about you may be processed in accordance with this Privacy Policy by one or more Sootchy companies. Depending on the circumstances and the nature of the processing activities, such Sootchy companies may act individually or jointly as data controllers, or in another legally applicable capacity, with respect to such personal information.

This Policy applies to personal data collected in connection with services offered by Sootchy or from other interactions with us where a link or other appropriate reference of incorporation to this Policy is made, for example, in connection with our website, applications and other types of

services offered by Sootchy typically in electronic form, as well as other services, such as customer care, customer events, or promotions and campaigns.

1. Personal Information Collected

Sootchy uses personal information about you to service, maintain, and protect your account; process transactions in your account; respond to inquiries from you or your representative; develop, offer, and deliver products and services; or to fulfill legal and regulatory requirements. We collect and receive information about you from various sources including the following:

1.1 Information you provide. Sootchy may collect public and non-public personal information about you from you or your representative.

1.2 Information collected through your use of the Sootchy Website. When you download and use our Service, we automatically collect information on the type of device you use, operating system version, and the device identifier. We collect information about how you use the Service, including information about your transactions and account activity with us and with any college savings programs and service providers who help us provide the Service.

1.3 Information from third parties. We may obtain information about you from third parties including the custodian holding your college savings accounts, companies we work with to develop or enhance the Service, companies we use to verify your identity (including your wireless provider), our affiliates, public sources and others. This information could include, among other things, information about your account transactions and balance and personally identifiable information. We may also obtain publicly available demographic data, and any information needed to comply with regulatory requirements, ensure the accuracy of data, better understand your likely interests, and/or prevent fraud.

1.4 Information from third-party social networking or authentication services. We may also receive personal information about you from third-parties when you log in through a third-party social networking or a single sign-on service. These services will authenticate your identity and provide you the option to share certain personal information with us, which could include your name, e-mail address, address book and contacts or other information. We use this information in the same way we use other personal information we collect from you as described in this Policy.

1.5 Information received via Cookies and other tracking technology. We, and our third-party service providers, automatically collect certain types of usage information when you visit our websites, use our Service, read our emails or otherwise engage with us via “tracking technologies”.

1.6 Information collected through your use of the Sootchy App. When you download and use our App, we automatically collect information on the type of device you use, operating system version, and the device identifier. We collect information about how you use the Service, including information about your transactions and account activity with us and with any college savings programs and service providers who help us provide the Service.

From these various tracking technologies, we may collect information about your device and its software, including but not limited to your IP address, browser type, Internet service provider, network domain, platform type, device type, operating system, date and time stamp. We may also collect information about the way you use our Service, how frequently you access the Service, access times, whether you open emails or click the links contained in emails, what content you view, whether you access the Service from multiple devices, and other actions you take on the Service. When you access our Service from a mobile device, we may collect unique identification numbers associated with your device (including, for example, a UDID, Unique ID for Advertisers ("IDFA"), Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and depending on your mobile device settings, your geographical location data including information regarding the location of your mobile device (subject to your prior consent when prompted). We may collect analytics data, or use third-party analytics tools such as Google Analytics, to help us measure traffic and usage trends for the websites and to understand more about the demographics of our users.

We do not collect personal information about your online activities over time and across different web sites or online services. Therefore, our websites do not respond to Do Not Track ("DNT") signals. We do not knowingly authorize third parties to collect personal information about your online activities over time and across different web sites or online services.

When you use our Services or otherwise interact with us over telecommunications networks, certain additional information, such as your mobile subscription number, may be transmitted to us by the telecommunications operator as a standard part of that communication. Please also see the "Cookie Policy" section below.

Examples of Tracking Technologies include:

- Application, Widgets, and Tools. We may enable individuals to download an application, widget, or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools can and may transmit personal information to Sootchy to enable you to access your account information and to enable us to track use of these tools. Some of these tools may enable

users to email reports and other information from the tool. We may use personal or non-identifiable information transmitted to us to enhance these tools, to develop new tools, for quality improvement, and as otherwise described in this Privacy Policy or in other notices we provide.

- Cookies. Sootchy uses cookies, which enable our web servers to "identify" users, each time an individual initiates a session on our websites. A cookie is set in order to identify you and tailor our websites for your personal experience. Cookies do not store any of the personal information that you provided to us. You may delete cookie files from your own hard drive at any time. However, cookies may be necessary to provide access to much of the content and many of the features of our websites
- Pixel Tags. Along with cookies, we may use "pixel tags" or "web beacons," which are small graphic files that allow us to monitor the use of our websites. A pixel tag can collect information such as the IP address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the type of browser that fetched the pixel tag; and the identification number of any cookie on the computer previously placed by that server.

1.6 Data concerning minors. We do not seek to collect any information from or engage in any transactions with persons under the legal age in their respective country. Our databases may nevertheless contain personal data of children due to the fact that it is not always possible to determine precisely the age of the user. If we learn that a minor has provided personal information through our services, we will use reasonable efforts to remove such information from our files. We reserve the right to block the service from any person who is or whom we reasonably suspect of being a minor. Sootchy's policy is to request that minors do not engage in other legal acts on relating to our services without the consent of a parent or legal guardian, unless otherwise permitted by applicable law. If you are a minor but have your legal guardian's consent, you must be able to prove that such consent exists upon request.

2. How We Use Information

Consistent with applicable law and the choices available to you, we use the information we collect for the purposes below. Please note that one or more purposes may apply simultaneously:

- Operate, maintain and provide you the Service
- Fulfill your requests or for the purposes explained when you provide information;

- Communicate with you, via email, chat, text messages, push notifications and/or telephone calls;
- Develop, analyze, and improve our websites and Service offerings;
- Personalize your experience when you use our Service or receive advertisements, which might entail combining personal data collected in connection with your use of Sootchy with other personal data we may hold about you, except where such personal data is collected for a different purpose;
- Deliver advertisements and other information about products, services and applications offered by Sootchy, our affiliates, and our participating companies;
- To let us know which emails have been opened by recipients, to understand the effectiveness of our marketing and other communications and to make those communications more useful and interesting to you;
- Remember your information so that you will not have to re-enter it during your next visit and identify you across different devices that you use;
- To help maintain the safety, security and integrity of our websites, products and services, database and other technology assets and business; diagnose or fix technology problems, and otherwise plan for and enhance our Service;
- To fulfill legal and regulatory requirements;

As otherwise may be necessary to perform or enforce any contracts between you and Sootchy.

3. Our Information Sharing Practices

Sootchy may share personal information about our customers with unaffiliated third parties in the instances described below. For further information on your choices regarding your information, see the Your Choices section below.

- Investment and non-investment account providers. We may share personal information about you with the investment and non-account providers you invest in through the Service.
- Agents and service providers. We may share personal information about you with agents and service providers, as needed to perform functions on our behalf, such as to send email and postal mail, analyze data, provide marketing services, and service accounts.
- Government agencies. We may share personal information about you with Government agencies with other regulatory bodies and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions).

- As permitted or required by law. We may share personal information about you as permitted or required by law (for example for fraud prevention or to respond to a subpoena).
- Third-parties as needed to maintain and service your Sootchy account. We may disclose personal information about you to third parties as reasonably necessary to maintain and service your Sootchy account, including to facilitate transactions.
- With our affiliates. We may provide personal information about you to our affiliates to the extent permitted by applicable law.
- Protection of Sootchy and others. We may also disclose personal information as we believe appropriate to enforce or apply our rights under our agreements (such as, for example, our Terms of Use) with third parties and to protect the rights, property or safety of Sootchy and others, including exchanging information for fraud protection and credit risk reduction.
- Use and sharing of information relating to social networks. If you access our applications or pages on social networking sites you may also be required to read and accept those sites' terms of service or privacy policies. In the future, those sites may use the information you provide them to serve you personalized advertising based on your background, location, demographics, likes, keywords, and any other information they receive from you, including the information you share with Sootchy on those sites. You acknowledge that you have agreed to and are bound by those sites' privacy policies and terms of use with respect to those sites' use of your information. Sootchy is not responsible for those sites' use of your information, including the information you may submit to Sootchy using those social networking sites. If you access our applications or pages on social networking sites, you authorize Sootchy to collect, store, and use all information you submit to social networking sites applications or pages. You also authorize Sootchy to collect, store, and use all information that you agreed the social networking site could provide to Sootchy through those sites' application programming interfaces. Sootchy will collect, store and use this information in accordance with this Privacy Policy. You agree to these conditions when you allow this sharing on social networking sites or start using our applications or pages on those sites. Please remember that when you interact with social networking applications or pages, you may have privacy controls at your disposal. When you publish content or information using a public setting on these social networking sites, you may be allowing everyone, including people off of those social networking sites, to access and use that information, and to associate it with you.

- Date in aggregate. Sootchy may share with any third parties information in an aggregated or otherwise anonymized form that does not personally identify individual clients or visitors for any reason Sootchy deems necessary or desirable.
- Other disclosures. We may disclose and otherwise process your personal data in accordance with applicable laws to defend Sootchy's legitimate interests, for example, in civil or criminal legal proceedings.
- Mergers and acquisitions. If we decide to sell, buy, merge, or otherwise reorganize our businesses in certain states or countries, this may involve us disclosing personal data to prospective or actual purchasers and their advisors, or receiving personal data from sellers and their advisors, for the purposes of such transactions. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal information in a manner that is consistent with this Privacy Policy.

4. Your Choices

4.1 Accessing Your Data. You may access, and update information stored in your account profile by visiting the Sootchy website or mobile application. Please keep your contact, account, and preference information up-to-date. Doing so enables you to receive maximum possible benefit from the Service.

4.2 Modifying or Deleting Your Data. If you have any questions about modifying or deleting your information, you may contact us by email at support@sootchy.com. We may not be able to modify or delete your information in all circumstances. We will retain your information for as long as you are a Sootchy client and/or we reasonably deem it necessary to provide you services, comply with our legal or other obligations, resolve potential disputes, audit our records and/or enforce our rights and obligations under our agreements. If you no longer want us to use your information to provide you services, you may terminate your Sootchy Client Agreement and request that your information be deleted. We may not be able to delete your information in all instances, such as if we are required to retain certain data for record-keeping purposes or to comply with laws.

4.3 Unsubscribe. If you do not wish to receive marketing messages from Sootchy, you may indicate your preferences by clicking the "Unsubscribe" link in the email. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service or technical and security notices).

5. How We Store and Protect Your Information

We care about the security of your information and use commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information collected through our Service. At Sootchy, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you. If personally identifiable information is accessed through our Service, it is encrypted before it is transmitted over the internet. To protect your personally identifiable information, we use technical and physical safeguards and train our employees. Where appropriate, we may also take back-up copies and use other such means to prevent accidental damage or destruction of your personal data. Where the Sootchy website supports online transactions, we will use an industry standard security measure, such as the one available through "Secure Sockets Layer" ("SSL"), to protect the confidentiality and security of online transactions.However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised in accordance with any applicable laws and regulations.

6. California Privacy Rights

If you are a resident of the State of California, under the California Consumer Privacy Act (CCPA), you have the right to request information on how to exercise your disclosure choice options from companies conducting business in California. Specifically,

- Exercising the Right to Know. You may request, up to twice in a 12-month period, the following about the personal information collected on you in the past 12 months: (a) the categories and specific pieces of personal information we have collected; (b) the categories of sources from which we collected the personal information; (c) the business or commercial purpose for which we collected it; (d) the categories of third parties with whom we shared the personal information; and (e) the categories of personal information about you that we disclosed for a business purpose.
- Exercising the Right to Delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- Exercising the Right to Opt-Out from Sale. You may request to opt out of any "sale" of your personal information that may take place.
- Non-Discrimination. The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, you may contact Sootchy Learning Exchange LLC either by email to support@sootchy.com or contact us via postal mail, proper postage prepaid, at:

Sootchy Learning Exchange LLC
Attn: Your California Privacy Rights
3003 W. Olympic Boulevard #106-550
Los Angeles, CA 90006

Please indicate your preference as to how you would like us to respond to your request (i.e., email or postal mail). All requests sent via postal mail must be labeled "Your California Privacy Rights" on the envelope or postcard and clearly stated on the actual request. For all requests, please include your name, street address (if you would like a response via postal mail), city, state, and zip code. We may need to verify your identity before responding to your request, such as verifying that the email address or contact information from which you send the request matches your email address or contact information that we have on file. Authentication based on a government-issued and valid identification document may be required. We will not accept requests via telephone or fax. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

7. Children's Privacy

Before allowing registration on our mobile application and before we collect personal information we will request a user's date of birth. Based on this date of birth, if the user is under 13 we will ask for the child's parent or guardian's email address and/or phone number for the limited purpose of obtaining parental/guardian consent. We will not use the parent/guardian email for any purpose other than obtain consent without express consent of the parent/guardian. If we do not receive parent/guardian consent in a reasonable period of time we will delete the email.

The information we obtain from children under 13 will be limited to that which is deemed necessary. We will not share child information unless required by law, essential to protect Sootchy, necessary to enable our service providers to perform services, or to help protect a child's safety.

At any time a parent/guardian can request that we terminate child access and delete any child information. Please note, that doing so may prevent the child from using our Services. To

request terminating child access please email us at support@sootchy.com along with the child's name and your email address and telephone number. You may also request we terminate access and data by sending a written request to Sootchy at 3003 W. Olympic Boulevard, Suite 105-660, Los Angeles, California 90006.

8. Links to Third Party Websites and Services

This Service may contain links to and from third party websites of college savings programs, service providers, advertisers, and social media companies. It is important to remember that if you link to another website from any of our Sootchy websites, that party's privacy policy and its terms and conditions of use apply to you. We encourage you to learn about each third party's privacy policy before giving your information to them.

9. Changes to this Sootchy Learning Exchange Privacy Policy

We may update this Sootchy Learning Exchange Privacy Policy to reflect changes to our practices from time-to-time. If we materially change this privacy policy or our information handling practices as described in this policy, we will notify you by email and/or through a notice on the applicable website prior to the change becoming effective. We encourage you to review this page periodically for the latest information on our privacy practices.

10. Contacting Sootchy about out Privacy Policy

Do not hesitate to contact Sootchy by email at support@sootchy.com with any questions or concerns you may have with our Privacy Policy. We want you to feel completely safe using our services, so we encourage ongoing communication with our clients

11. Effective Date

This online Sootchy Learning Exchange Privacy Policy is effective as of March 6, 2023, and replaces any prior Sootchy Learning Exchange Privacy Policy.

Sootchy Learning Exchange Privacy Policy of Sootchylearn.com

Sootchylearn.com collects some Personal Data from its Users. This document can be printed for reference by using the print command in the settings of any browser.

Policy summary

Personal Data collected for the following purposes and using the following services:

Analytics

- Google Analytics, HubSpot Analytics and Wordpress Stats
  Personal Data: Cookies; Usage Data

Backup saving and management

- Amazon Glacier
  Personal Data: various types of Data as specified in the privacy policy of the service

Contacting the User

- Contact form
  Personal Data: email address; first name; last name; phone number
- Phone contact
  Personal Data: phone number

Content commenting

- Facebook Comments
  Personal Data: Cookies; Usage Data
- Disqus
  Personal Data: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service
- Comment system managed directly
  Personal Data: Cookies; email address; first name; last name; phone number; Usage Data; username; website

Displaying content from external platforms

- Font Awesome
  Personal Data: Usage Data
- Google Fonts
  Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
- Google Maps widget, Instagram widget, OpenStreetMap widget and YouTube video widget
  Personal Data: Cookies; Usage Data

Heat mapping and session recording

- Hotjar Heat Maps & Recordings
  Personal Data: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service

Hosting and backend infrastructure

- Amazon Web Services (AWS) and mLab
  Personal Data: various types of Data as specified in the privacy policy of the service

Infrastructure monitoring

- Crashlytics
  Personal Data: geographic position; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service

- Instabug
  Personal Data: address; app information; Cookies; country; date of birth; device information; device logs; email address; first name; geographic position

- New Relic
  Personal Data: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service

- Uptime Robot
  Personal Data: various types of Data as specified in the privacy policy of the service

Interaction with external social networks and platforms

- AddThis, AddToAny, Facebook Like button and social widgets, LinkedIn button and social widgets, Pinterest “Pin it” button and social widgets, Reddit button and widgets, ShareThis, StumbleUpon button and social widgets, Tumblr sharing button and social widgets and Twitter Tweet button and social widgets
  Personal Data: Cookies; Usage Data

Interaction with live chat platforms

- Zendesk Chat
  Personal Data: address; country; Data communicated while using the service; email address; first name; last name; phone number

Interaction with support and feedback platforms

- Zendesk Widget
  Personal Data: address; country; date of birth; email address; first name; last name; phone number

Managing contacts and sending messages

- HubSpot Email
  Personal Data: email address; Usage Data
- Sendgrid
  Personal Data: address; country; date of birth; email address; first name; last name; phone number

Managing support and contact requests

- Zendesk
  Personal Data: various types of Data as specified in the privacy policy of the service

Remarketing and behavioral targeting

- Facebook Custom Audience and Twitter Tailored Audiences
  Personal Data: Cookies; email address
- Facebook Remarketing, Google Ad Manager Audience Extension, Google Ads Remarketing, LinkedIn Website Retargeting, Remarketing with Google Analytics and Twitter Remarketing
  Personal Data: Cookies; Usage Data

RSS feed management

- Feedburner
  Personal Data: Cookies; Usage Data
- FeedPress
  Personal Data: Usage Data

SPAM protection

- Google reCAPTCHA
  Personal Data: Cookies; Usage Data
- Akismet
  Personal Data: various types of Data as specified in the privacy policy of the service

Tag Management

- Google Tag Manager
  Personal Data: Usage Data

Traffic optimization and distribution

- Sucuri CloudProxy
  Personal Data: various types of Data as specified in the privacy policy of the service

User database management

- HubSpot CRM
  Personal Data: email address; phone number; various types of Data as specified in the privacy policy of the service
- HubSpot Lead Management
  Personal Data: various types of Data as specified in the privacy policy of the service

Contact information

- Owner and Data Controller
  Sootchy Learning Exchange LLC
  3003 W. Olympic Boulevard #106-550
  Los Angeles, CA 90006
  Owner contact email: support@sootchy.com

Full Policy

Owner and Data Controller

Sootchy Learning Exchange LLC
3003 W. Olympic Boulevard, Suite #106-550
Los Angeles, CA 90006
Owner contact email: support@sootchy.com

Types of Data collected

Among the types of Personal Data that Sootchylearn.com collects, by itself or through third parties, there are: Cookies; Usage Data; first name; last name; phone number; email address; date of birth; address; country; Data communicated while using the service; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); geographic position; app information; device information; device logs; username; website

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Sootchylearn.com.

Unless specified otherwise, all Data requested by Sootchylearn.com is mandatory and failure to provide this Data may make it impossible for Sootchylearn.com to provide its Services. In cases where Sootchylearn.com specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

sers who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by Sootchylearn.com or by the owners of third-party services used by Sootchylearn.com serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through Sootchylearn.com and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Sootchylearn.com (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

We take reasonable steps to keep the personal data we possess accurate and up-to-date and to delete out of date or otherwise incorrect or unnecessary personal data.

Certain Sootchy Services may allow you to manage your profile and the information in such profile. We encourage you to access your personal data via your profile from time to time to ensure that it is correct and up-to-date. Please remember that for such electronic services where you may manage your profile, it is your responsibility to provided us with correct details as well as to update the personal data you have provided us with in case of any changes.

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Contacting the User, User database management, Managing contacts and sending messages, Traffic optimization and distribution, SPAM protection, Hosting and backend infrastructure, Interaction with external social networks and platforms, Tag Management, RSS feed management, Remarketing and behavioral targeting, Managing support and contact requests, Interaction with support and feedback platforms, Interaction with live chat platforms, Infrastructure monitoring, Heat mapping and session recording, Displaying content from external platforms, Content commenting and Backup saving and management.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior

- Google Analytics (Google LLC)
  Google Analytics is a web analysis service provided by Google LLC ("Google"). Google

utilizes the Data collected to track and examine the use of Sootchylearn.com, to prepare reports on its activities and share them with other Google services.
Google may use the Data collected to contextualize and personalize the ads of its own advertising network.
Personal Data processed: Cookies; Usage Data.
Place of processing: United States – Privacy Policy – Opt Out.

- HubSpot Analytics (HubSpot, Inc.)
  HubSpot Analytics is an analytics service provided by HubSpot, Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy – Opt Out

- Wordpress Stats (Automattic Inc.)
  Wordpress Stats is an analytics service provided by Automattic Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

Backup saving and management

This type of service allows the Owner to save and manage backups of Sootchylearn.com on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to Sootchylearn.com.

- Amazon Glacier (Amazon)
  Amazon Glacier is a service to save and manage backups provided by Amazon Web Services Inc.
  Personal Data processed: various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy

Contacting the User

- Contact form (Sootchylearn.com)
  By filling in the contact form with their Data, the User authorizes Sootchylearn.com to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.
  Personal Data processed: email address; first name; last name; phone number.

- Phone contact (Sootchylearn.com)
  Users that provided their phone number might be contacted for commercial or promotional purposes related to Sootchylearn.com, as well as for fulfilling support

requests.
Personal Data processed: phone number.

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of Sootchylearning.com. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments. If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

- Facebook Comments (Facebook, Inc.)
  Facebook Comments is a content commenting service provided by Facebook, Inc. enabling the User to leave comments and share them on the Facebook platform.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Disqus (Disqus)
  Disqus is a content commenting service provided by Big Heads Labs Inc.
  Personal Data processed: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy – Opt out.

- Comment system managed directly (Sootchylearn.com)
  Sootchylearn.com has its own internal content comment system.
  Personal Data processed: Cookies; email address; first name; last name; phone number; Usage Data; username; website.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of Sootchylearn.com and interact with them. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

- Font Awesome (Fonticons, Inc.)
  Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows Sootchylearn.com to incorporate content of this kind on its pages.
  Personal Data processed: Usage Data.
  Place of processing: United States – Privacy Policy.

- Google Fonts (Google LLC)
  Google Fonts is a typeface visualization service provided by Google LLC that allows Sootchylearn.com to incorporate content of this kind on its pages.
  Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

- Google Maps widget (Google LLC)
  Google Maps is a maps visualization service provided by Google LLC that allows Sootchylearn.com to incorporate content of this kind on its pages.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Instagram widget (Instagram, Inc.)
  Instagram is an image visualization service provided by Instagram, Inc. that allows Sootchylearn.com to incorporate content of this kind on its pages.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- OpenStreetMap widget (OpenStreetMap Foundation)
  OpenStreetMap widget is a maps visualization service provided by OpenStreetMap Foundation that allows Sootchylearn.com to incorporate content of this kind on its pages.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United Kingdom – Privacy Policy.

- YouTube video widget (Google LLC)
  YouTube is a video content visualization service provided by Google LLC that allows Sootchylearn.com to incorporate content of this kind on its pages.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

Heat mapping and session recording

Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.Some of these services may record sessions and make them available for later visual playback

- Hotjar Heat Maps & Recordings (Hotjar Ltd.)
  Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.
  Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script

not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.
Personal Data processed: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service.
Place of processing: Malta – Privacy Policy – Opt Out.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable Sootchylearn.com to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Sootchylearn.com.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

- Amazon Web Services (AWS) (Amazon Web Services, Inc.)Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.Personal Data processed: various types of Data as specified in the privacy policy of the service.Place of processing: United States – Privacy Policy.

- mLab (ObjectLabs Corporation)
  mLab is a hosting and backend service provided by ObjectLabs Corporation.
  Personal Data processed: various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy

Infrastructure monitoring

This type of service allows Sootchylearn.com to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Sootchylearn.com.

- Crashlytics (Google LLC)
  Crashlytics is a monitoring service provided by Google LLC.
  Personal Data processed: geographic position; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

- Instabug (Instabug, Inc.)
  Instabug is a monitoring service provided by Instabug, Inc.
  Personal Data processed: address; app information; Cookies; country; date of birth;

device information; device logs; email address; first name; geographic position.
Place of processing: United States – Privacy Policy.

- New Relic (New Relic)
  New Relic is a monitoring service provided by New Relic Inc.
  The way New Relic is integrated means that it filters all traffic of Sootchylearn.com, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on Sootchylearn.com to be collected.
  Personal Data processed: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

- Uptime Robot (Buzpark Bilisim Tarim Urunleri Sanayi Tic. Ltd. Sti.)
  Uptime Robot is a monitoring service provided by Buzpark Bilisim Tarim Urunleri Sanayi Tic. Ltd. Sti.
  Personal Data processed: various types of Data as specified in the privacy policy of the service.
  Place of processing: Turkey – Privacy Policy.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of Sootchylearn.com. The interaction and information obtained through Sootchylearn.com are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on Sootchylearn.com isn't being connected back to the User's profile.

- (Oracle Corporation)
  This is a service provided by Oracle Corporation, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of Sootchylearn.com.
  Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- ToAny LLC
  ToAny is a service provided by ToAny LLC, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of Sootchylearn.com.
  Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Buffer button and social widgets (Buffer)
  The Buffer button and social widgets are services allowing interaction with the Buffer service provided by Buffer, Inc.
  Personal Data processed: Usage Data.
  Place of processing: United States – Privacy Policy.

- Facebook Like button and social widgets (Facebook, Inc.)
  The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- LinkedIn button and social widgets (LinkedIn Corporation)
  The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Myspace button and social widgets (Myspace LLC)
  The Myspace button and social widgets are services allowing interaction with the Myspace social network provided by Myspace LLC.
  Personal Data processed: Usage Data.
  Place of processing: United States – Privacy Policy.

- Pinterest “Pin it” button and social widgets (Pinterest)
  The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Reddit button and widgets (reddit inc.)
  The reddit button and widgets are services allowing interaction with the reddit platform provided by reddit inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- ShareThis (Sharethis Inc.)
  ShareThis is a service provided by ShareThis Inc., which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of Sootchylearn.com.
  Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- StumbleUpon button and social widgets (StumbleUpon, Inc.)
  The StumbleUpon button and social widgets are services allowing interaction with the StumbleUpon social network provided by StumbleUpon, Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy

- Tumblr sharing button and social widgets (Tumblr Inc.)
  The Tumblr sharing button and social widgets are services allowing interaction with the Tumblr social network provided by Tumblr Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Twitter Tweet button and social widgets (Twitter, Inc.)
  The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- YouTube button and social widgets (Google LLC)
  The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC.
  Personal Data processed: Usage Data.
  Place of processing: United States – Privacy Policy.

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of Sootchylearn.com, for contacting and being contacted by Sootchylearn.com support service.If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

- Zendesk Chat (Zendesk, Inc.)
  Zendesk Chat is a service for interacting with the Zendesk live chat platform provided by Zendesk, Inc.
  Personal Data processed: address; country; Data communicated while using the service; email address; first name; last name; phone number.
  Place of processing: United States – Privacy Policy.

Interaction with support and feedback platforms

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of Sootchylearn.com.If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

- Zendesk Widget (Zendesk, Inc.)
  The Zendesk Widget is a service for interacting with the Zendesk support and feedback platform provided by Zendesk Inc.
  Personal Data processed: address; country; date of birth; email address; first name; last name; phone number.
  Place of processing: United States – Privacy Policy.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

- HubSpot Email (HubSpot, Inc.)
  HubSpot Email is an email address management and message sending service provided by HubSpot, Inc.
  Personal Data processed: email address; Usage Data.
  Place of processing: United States – Privacy Policy.

- Sendgrid (Sendgrid)
  Sendgrid is an email address management and message sending service provided by Sendgrid Inc.
  Personal Data processed: address; country; date of birth; email address; first name; last name; phone number.
  Place of processing: United States – Privacy Policy.

Managing support and contact requests

This type of service allows Sootchylearn.com to manage support and contact requests received via email or by other means, such as the contact form.The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

- Zendesk (Zendesk, Inc.)
  Zendesk is a support and contact request management service provided by Zendesk Inc.
  Personal Data processed: various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

Remarketing and behavioral targeting

This type of service allows Sootchylearn.com and its partners to inform, optimize and serve advertising based on past use of Sootchylearn.com by the User. This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity. Some services offer a remarketing option based on email address lists. In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

- Facebook Custom Audience (Facebook, Inc.)
  Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of Sootchylearn.com with the Facebook advertising network.Users can opt out of Facebook's use of cookies for ads personalization by visiting this opt-out page. Personal Data processed: Cookies; email address.Place of processing: United States – Privacy Policy – Opt Out.

- Facebook Remarketing (Facebook, Inc.)
  Facebook Remarketing is a remarketing and behavioral targeting service provided by

Facebook, Inc. that connects the activity of Sootchylearn.com with the Facebook advertising network.
Personal Data processed: Cookies; Usage Data.
Place of processing: United States – Privacy Policy – Opt Out.

- Google Ad Manager Audience Extension (Google LLC)
  Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC that tracks the visitors of Sootchylearn.com and allows selected advertising partners to display targeted ads across the web to them.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy – Opt Out.

- Google Ads Remarketing (Google LLC)
  Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of Sootchylearn.com with the Google Ads advertising network and the DoubleClick Cookie.
  Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy – Opt Out.

- LinkedIn Website Retargeting (LinkedIn Corporation)
  LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of Sootchylearn.com with the LinkedIn advertising network.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy – Opt Out.

- Remarketing with Google Analytics (Google LLC)
  Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC that connects the tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy – Opt Out.

- Twitter Remarketing (Twitter, Inc.)
  Twitter Remarketing is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of Sootchylearn.com with the Twitter advertising network.

Personal Data processed: Cookies; Usage Data.
Place of processing: United States – Privacy Policy – Opt Out.

- Twitter Tailored Audiences (Twitter, Inc.)
  Twitter Tailored Audiences is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of Sootchylearn.com with the Twitter advertising network.
  Users can opt out from interest-based ads by going to: Personalization and Data.
  Personal Data processed: Cookies; email address.
  Place of processing: United States – Privacy Policy – Opt Out.

RSS feed management

This type of service allows Sootchylearn.com to manage RSS feeds and the distribution of their content. Depending on the characteristics of the service used, these services may be used to insert ads within the content and to gather statistics data from them.

- Feedburner (Google LLC)
  Feedburner is a service to manage RSS feeds provided by Google LLC. It allows the collection of statistics on what content is consumed and to insert ads in it.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- FeedPress (Beta Et Compagnie Sarl)
  FeedPress is a service to manage RSS feeds provided by Beta Et Compagnie Sarl. It allows the collection of statistics on what content is consumed.
  Personal Data processed: Usage Data.
  Place of processing: France – Privacy Policy.

SPAM protection

This type of service analyzes the traffic of Sootchylearn.com, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

- Google reCAPTCHA (Google LLC)
  Google reCAPTCHA is a SPAM protection service provided by Google LLC.
  The use of reCAPTCHA is subject to the Google privacy policy and terms of use.
  Personal Data processed: Cookies; Usage Data.
  Place of processing: United States – Privacy Policy.

- Akismet (Automattic Inc.)
  Akismet is a SPAM protection service provided by Automattic Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service. Place of processing: United States – Privacy Policy.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on Sootchylearn.com in a centralized fashion.This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

- Google Tag Manager (Google LLC)
  Google Tag Manager is a tag management service provided by Google LLC.
  Personal Data processed: Usage Data.
  Place of processing: United States – Privacy Policy.

Traffic optimization and distribution

This type of service allows Sootchylearn.com to distribute their content using servers located across different countries and to optimize their performance.Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between Sootchylearn.com and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

- Sucuri CloudProxy (Sucuri, Inc.)
  Sucuri CloudProxy is a traffic optimization and distribution service provided by Sucuri, Inc.
  The way Sucuri CloudProxy is integrated means that it filters all the traffic through Sootchylearn.com, i.e., communication between Sootchylearn.com and the User's browser, while also allowing analytical data from Sootchylearn.com to be collected.
  Personal Data processed: various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Sootchylearn.com, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Sootchylearn.com. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Sootchylearn.com.

- HubSpot CRM (HubSpot, Inc.)
  HubSpot CRM is a User database management service provided by HubSpot, Inc.
  Personal Data processed: email address; phone number; various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

- HubSpot Lead Management (HubSpot, Inc.)
  HubSpot Lead Management is a User database management service provided by HubSpot, Inc.
  Personal Data processed: various types of Data as specified in the privacy policy of the service.
  Place of processing: United States – Privacy Policy.

The Rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and

that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority, or contact us by email at support@sootchy.com.

California Rights

Right to know/access

California residents have the right, (upon a verifiable request) to request the following:

1. The categories and/or the specific pieces of personal information about you that we collect, use, disclose, and may sell.
2. The categories of sources from which personal information is collected.
3. The business or commercial purpose for collecting or selling personal information.
4. The categories of third parties with whom we share personal information.
5. The specific pieces of personal information we have collected about you.

You may request this information up to two (2) times each year, and we will respond within forty-five (45) days without charging you.

Additionally, you may request and obtain from us one (1) time per year, free of charge, information about our disclosure of personal information to third parties or affiliated companies for their direct marketing purposes.

Please note that Sootchy may need to identify you and to ask for additional information in order to fulfill your request. You can make your request through the online webform listed below. You may be required to provide your email address on file with us among other information. We will acknowledge your request within ten (10) days. Upon verification of your identity, we will fulfill your request. However, we will not provide any information that we reasonably believe may be subject to fraudulent action.

Right to request deletion of personal information

Subject to certain expectations, California residents have the right to request deletion of their personal information collected or maintained by Sootchy. Please note that Sootchy may need to identify you and to ask for additional information in order to be able to fulfill your request. You can make your request at the toll-free number or through the online webform listed below. In both instances, you may be required to provide your email address on file with us among other information. We will acknowledge your request within ten (10) days. Upon verification of your

identity, we will fulfill your request. However, we will not provide any information that we reasonably believe may be subject to fraudulent action.

To submit a deletion request please email support@sootchy.com or submit a request through our online form – Please select Type of Request "Personal Data Management" and Data Request Type "Right to Deletion" prior to filling following fields when making your request. Please also indicate in the "Comments" field "Right to Deletion".

Please note, to ensure that your personal information is permanently deleted, you should delete your cookies from your browser (refer to our link to Sootchy cookie policy) and decline giving your consent via our Cookie Settings — Sootchy Learning Exchange.

California minors only

See DATA CONCERNING MINORS section above. A business shall not sell the personal information of consumers if the business has actual knowledge that the consumer is less than 16 years of age, unless the consumer, in the case of consumers at least 13 years of age and less than 16 years of age, or the consumer's parent or guardian, in the case of consumers who are less than 13 years of age, has affirmatively authorized the sale of the consumer's personal information. This is the right to opt-in. If you are between 13 and 16 years of age, you may opt-in simply by consenting to cookies via our Cookie Settings — Sootchy Learning Exchange. If you are under 13 years of age, we do not seek to engage with you in any transaction, tracking by cookies or otherwise.

Authorized agent

You have the right to designate an authorized agent to make any CCPA request on your behalf. Sootchy reserves the right to ask for proof that such agent is in fact authorized by you. Please direct your agent reach out by email at support@sootchy.com or (323) 677-4482. Authorized agents must submit proof of the consumer's signed authorization to make a request. We may require you to verify your identity directly with us prior to fulfilling your authorized agent's request.

CCPA Disclosures

Pursuant to the CCPA, and in addition to the disclosures elsewhere in this Privacy Policy, this section describes the types of personal information that we collected, disclosed for business purposes, or sold to third parties in the last twelve (12) months.

- Personal Information Collected: Biographical information / identifiers, characteristics of protected classifications under California or federal law (i.e., gender, age), commercial information, payment card information, internet or other electronic network activity information, geolocation information, visual information, and inferences drawn from the

above. For more information about the information that we collect, please see the above Privacy Policy terms. The sources of the information are the consumer, our business customers and partners, analytics providers, advertising partners, social networks, and service providers.

- Disclosure of Personal Information: In the last twelve (12) months, Sootchy has disclosed the following categories of personal information to its service providers, contractors, and vendors for business purposes: Biographical information / identifiers, characteristics of protected classifications under California or federal law (i.e., gender, age), commercial information, financial and payment number, internet or other electronic network activity information, geolocation information, education information, visual information, and inferences drawn from the above. To learn more, please see the above Privacy Policy terms.

Right to Non-Discrimination for the Exercise of Your California Rights

You have the right not be discriminated against because you exercised any of your rights under California law.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

Sootchylearn.com uses Trackers. To learn more, the User may consult the Cookie Policy.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Sootchylearn.com or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Sootchylearn.com may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Sootchylearn.com and any third-party services may collect files that record interaction with Sootchylearn.com (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

Sootchylearn.com does not support “Do Not Track” requests.To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this Privacy Policy

The Owner reserves the right to make changes to this Privacy Policy at any time by notifying its Users on this page and possibly within Sootchylearn.com and/or, as far as technically and legally feasible, sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Sootchylearn.com (or third-party services employed in Sootchylearn.com), which can include: the IP addresses or domain names of the computers utilized by the Users who use Sootchylearn.com, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Sootchylearn.com who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Sootchylearn.com. The Data Controller, unless otherwise specified, is the Owner of Sootchylearn.com.

Sootchylearn.com (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Sootchylearn.com as described in the relative terms (if available) and on this site/application.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to Sootchy Learning Exchange LLC, if not stated otherwise within this document.

Already a corporate customer?

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