

# Privacy Policy and Cookie Policy

*This Privacy Policy was last updated on December 28, 2020.*

All capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in Own The Vision Academy's [Terms of Use](#).

Any version of this Privacy Policy in a language other than English is provided for convenience and You understand and agree that the English language will control if there is any conflict with any non-English versions.

Own The Vision Academy, Inc. a Delaware corporation located in Atlanta, Georgia, United States of America ("Own The Vision Academy", "We", "Us", or "Our") respects Your rights regarding Your privacy and information, and We provide this Privacy Policy ("Privacy Policy") to help You understand how We collect, use, share, store and disclose information We obtain from or about You when You use the Services. This Privacy Policy applies to when You use Our Services where We provide a link to this Privacy Policy, unless otherwise stated or unless We provide a link to a different policy. This Privacy Policy also describes the choices available to You regarding the use of, Your access to and how to update and correct Your information.

As used herein the term "use" shall mean use, access, install, sign into, connect with, download, visit or browse the Services, as defined in the [Terms of Use](#).

THIS IS A LEGALLY BINDING AGREEMENT BETWEEN YOU AND OWN THE VISION ACADEMY, AND BY USING THE SERVICES, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND THE [TERMS OF USE](#). You should review this Privacy Policy in conjunction with Our [Terms of Use](#) and any other agreement or policy provided by Us that governs Your use of the Services.

You should not use the Services if You do not agree with this Privacy Policy, Our Terms of Use and any other agreement or policy that governs Your use of the Services.

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## 1. Information You Provide to Us Directly

Own The Vision Academy may collect different information from or about You depending on the manner in which You use the Services. The following examples are provided to help You better understand the information We may collect through Your use of the Services.

**Please note, Own The Vision Academy is not responsible for how others use information that is publicly available or otherwise accessible to others who have access to the Services.**

When You sign up for and use the Services (including through a Third Party Platform) We will collect any information You provide to Us directly such as the following:

### Registration Information:

In order to use certain features of the Services, such as purchasing or registering for a Course, You are required to register for an Account, and in that case, We will collect and store any registration information You provided to Us, such as e-mail address, password, Your date of birth, and age, and we will assign You a unique identifying number ("Registration Information").

### Profile Information:

You may also have the option of providing additional information about Yourself, including but not limited to a photo, headline, website link, social media profiles, or other information you may choose to enter ("Profile Information") to create a profile ("Profile"). Your Profile and Profile Information will be publicly viewable to others.

### Public Posting / Shared Content:

Some of the Services may allow You to interact with other Users and/or post, share, communicate or otherwise transmit content publicly, such as by posting comments in a Course page, sending messages to others, or posting photos (collectively "Shared Content" or "Public Posting"). We may collect and store Public Postings and Shared Content. Shared Content or Public Postings may be publicly available or viewable by others depending on where such content is posted.

You hereby grant Own The Vision Academy a non-exclusive right and license to reproduce, distribute, publicly perform, offer, market and otherwise use and exploit the Public Postings and Shared Content.

### Course Information:

Own The Vision Academy allows You to enroll in and take online Courses on a variety of topics which are taught by Instructors where, among other things, You will see reviews for Courses by others. We collect information relating to taking Courses, including, without limitation, course, assignment, and quiz completion activity, interchanges with the Course Instructors, teaching assistants and other Students, answers to questions, essays and other items submitted to satisfy the Course requirements, ("Course Information").

You hereby consent to Our sharing of Registration Information (except for your email address), Profile Information, and Course Information to Instructors and teaching assistants. Own The Vision Academy does not provide Students' email addresses to Instructors or teaching assistants. Own The Vision Academy does not control how Instructors or teaching assistants treat Registration Information, Profile Information, or Course Information and is not liable for Instructors' or teaching assistants' use of such information.

### Payment Information:

If You make any purchases through our Services, such as for Courses, We may collect certain information regarding Your purchase (such as Your name and zip code) as necessary to process Your order. You will be required to provide certain payment and billing information directly to our payment processing partners, including but not limited to Your name, credit card information, billing address and zip code. We do not access, store or collect Your credit card information.

If You are an Instructor, We may enable You to link Your PayPal account or other payment account to the Services so that We can pay You. When You link such account, You allow Us to collect and use certain information from such accounts to provide those payments, such as Your payment account email address or account ID, physical address, and other information necessary for Us to send payment to such account. We do not access, store, or collect Your payment card or bank account information. The collection, use, and disclosure of Your information will also be subject to the privacy policies and other terms of the payment account providers. You should review such privacy policies, terms, and other agreements.

### Information Received Through Your Third Party Platform:

The Services may contain third party links or allow You to access the Services through Third Party Platforms, such as Facebook. If You use Our Services on or through a Third Party Platform, including via any mobile and/or other Internet connected devices ("Wireless Devices"), or click on third party links, the collection, use, and disclosure of Your information and Your use of the Services will also be subject to the privacy policies and other terms of such third parties or Third Party Platforms. You should review such privacy policies, terms, and other agreements.

When You use Our Services through a Third Party Platform, You allow Us to collect and use certain information from Your Third Party Platform profile or account as permitted by the terms of that Third Party Platform and Your privacy settings and in accordance with this Privacy Policy.

**By way of example only**, We may collect some or all of the following information from Your Third Party Platform account when You register or use the Services on or through a Third Party Platform:

- Your full name
- Your profile picture or its URL
- Your ID Number, which is linked to publicly available information such as Your name and profile photo
- The login e-mail address
- Your physical location and that of Your access devices, including any Wireless Device
- Your gender
- Your birthday
- List of friends or contacts

You may choose not to allow the Third Party Platform to provide Us with certain information about You, but You might not be able to use certain features of Our Services if You enable such restrictions.

#### Sweepstakes, promotions, and Surveys:

From time to time, We may ask You to complete a survey and/or offer You the opportunity to participate in promotions and/or sweepstakes (collectively, “Promotions”) via the Services or through a Third Party Platform. If You choose to participate in a Promotion, We will collect and store the information You provide in connection with Your participation in the Promotion, including, but not limited to, Your name, e-mail address, date of birth, and/or phone number. Such information shall be subject to this Privacy Policy unless otherwise stated in the official rules or guidelines of the Promotion or in another privacy policy governing the Promotion. Information we collect in connection with a Promotion will be used to administer the Promotion, such as by notifying winners and distributing prizes. As permitted by applicable law, Your information may also be used by Own The Vision Academy or the Promotion sponsor for marketing purposes.

Your entry into the Promotion may result in the addition of Your information to our mailing list as well as to the mailing list of our promotional partners. Acceptance of a prize may require You (unless prohibited by law) to allow Us to post publicly some of Your information via our Services, such as on a winner’s page. In some instances, a third-party advertiser or sponsor may operate or host a Promotion on or through our Services, and collect Your information. In those cases, where We are not the sponsor or operator of the Promotion, We have no control over the information collected and, before participating, You should review the official rules as well as the advertiser’s or the sponsor’s privacy policy applicable to the Promotion. All of Our Promotions are intended for people who are the age of majority in their respective state, province or country unless otherwise expressly stated.

#### Communications, Support Requests, Potential Abuse:

If You contact Us for assistance, or to report a problem, concern, potential abuse or other issues regarding the Services, including before You have created an Account, We may collect and store Your contact information, communication, and/or other information about You, including but not limited to Your name, e-mail address, location, operating system, IP

address, any other information You provide Us in the course of such communications, and/or other information that may be collected by automated means described herein. We reserve the right to conduct further research and obtain further information as necessary. We will use the information to respond to You and research Your request/communication, all in accordance with the provisions of this Privacy Policy.

## 2. Information We Collect Through Automated Means

### Technical and Usage Data

When You access the Services, including browsing Our Courses, We collect certain information by automated means. This information may include without limitation: (a) technical information about Your computer or Wireless Device, such as Your IP address, device type, operating system type and version, unique device ID, browser, browser language, domain and other systems information, platform types (collectively, "Technical Information"); and (b) usage statistics about Your interaction with the Services, including Courses accessed, time spent on pages or the Services, pages visited, search queries, click data, portions of the Services used, date and time, and other information regarding Your use of the Services (collectively, "Usage Data").

This Technical Information and Usage Data, which may be linked to Your information, is collected through the use of server log files and tracking technologies, including: (i) cookies, which are small files that websites send to Your computer or Wireless Device to uniquely identify Your browser or mobile device or to store information in Your browser setting; and (ii) web beacons, which are small objects that allow Us to measure the actions of visitors using the Services. For more detailed information regarding how We use cookies and other technology, please review the additional information in this Privacy Policy under the Section entitled "Our Cookies Policy" and review the full Own The Vision Academy Cookies Policy [here](#).

Geolocation Information: IP addresses received from Your browser or device may be used to determine Your approximate location, such as the city, state and/or country associated with an IP address.

## 3. Cookies and Data Collection Tools

Like many websites and app providers, Own The Vision Academy (and/or service providers acting on Our behalf, such as Google Analytics and/or our third party advertisers) may use server log files and automated data collection tools, such as cookies, tags, scripts, device or browser fingerprints, and web beacons (collectively, "Data Collection Tools") when You access and use our Services. In some cases, We tie the information gathered by these means to Our other information You provide and that we collect as described in this Privacy Policy. These Data Collection Tools automatically track and collect certain Technical Information and Usage Data that Your browser sends when You use our Services. In some cases, We will associate this Technical Information and Usage Data with other information about You.

We use cookies for a variety of reasons, including to: (i) analyze the usage of our Services; (ii) provide a more personalized experience; (iii) allow You to more easily login to use our

Services; and (iv) help make Your use of Our Services more efficient and more valuable by providing You with a customized experience and recognizing You when You return.

We may also employ web beacons or other technology for a variety of reasons such as: (i) allowing Us to know if a certain page was visited or whether an e-mail was opened; (ii) allowing Us to advertise more efficiently by excluding our current Users from certain promotional messages or identifying the source of a new installation.

Own The Vision Academy uses the following types of cookies:

*Preferences.* We use preferences cookies to remember information about Your browser and how You prefer to use Our Service, i.e. to remember Your preferred settings that affect the experience of how Our Services look to You or behave when You access and/or use them, such as Your preferred language. Preference cookies make Your experience of interacting with Our Services more functional and customized to suit Your preferences.

*Security.* We use security cookies to enable You to log-in and access Our Service, to protect Your Account against fraudulent log-ins by others, and help detect, fight, and protect against abuse or unauthorised usage of Your Account.

*Functional.* We use functional cookies to make the experience of using Our Services better, like remembering the volume at which You like Your videos to play.

*Session State.* We use session cookies to collect information about how You interact with Our Services, to help Us improve Our Services, as well as improve Your browsing experience. We also use session cookies to remember Your log-in details and to be able to process Your purchases of Courses. These are deemed strictly necessary to the working of the Services. If these are disabled, then various functionalities of our Services will be broken.

You can set Your web browser to warn You about attempts to place cookies on Your computer, limit the types of cookies You allow or refuse cookies altogether; however, You may not be able to use some or all of the features of the Services, or Your experience will be different or less functional if You refuse/disable cookies.

Third parties with whom We partner to provide certain features on Our site may use Local Storage Objects, also known as Flash Cookies (LSOs) to collect and store information. Various browsers may offer their own management tools for removing LSOs. To manage LSOs provided by Adobe, please click [here](#).

By using Our Services, You consent to Our use of cookies, web beacons, LSOs and other Data Collection Tools as described in this Privacy Policy. For more information, please see the Own The Vision Academy Cookies Policy available [here](#).

#### 4. Analytics.

We may use third-party browser and mobile analytics services on our Service, including but not limited to Google Analytics, Full Contact, Hotjar, and Intercom. These service providers use the sort of technology described above to help us analyze how users use the Services, including by noting the third-party website from which you arrive, how often You use the Services, the events that occur within the Service, usage data, performance data, and where the application was downloaded from.

The information collected will be disclosed to or collected directly by these service providers, and We use this information to improve the Services, to better understand the functionality of the Services on a computer or other device, and to provide information that may be of interest to You.

For instance, Hotjar generates heatmaps of user experiences and records, on a deidentified basis, information about your activity, such as mouse clicks, mouse movements, scrolling activity as well as certain text You type in the Services such as searches for Courses.

You have some choices concerning our use of these analytics. For instance, to prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#); to opt out of Hotjar's use of Your information for analytics click [here](#).

## 5. Online Advertising

We may use third-party advertising technologies that allow for the delivery of advertising about our Services on other websites You visit and other applications You use. The ads may be based on various factors such as the content of the page You are visiting, information You enter such as Your age and gender, Your searches, demographic data, user-generated content, and other information we collect from You. These ads may be based on Your current activity or Your activity over time and across other websites and online services and may be tailored to Your interests.

We use third parties (e.g., ad networks and ad servers such as Google Analytics, DoubleClick and others) to help deliver these tailored advertising on other websites and in mobile applications. These third parties may place cookies or other tracking technologies on Your computer, mobile phone, or other device to collect information about Your use of the Services as discussed above and may access these cookies or other tracking technologies on Your computer, mobile phone, or other device You use to access the Services in order to serve these tailored advertisement. We also may share with third-party advertisers a hashed version of Your email address that is anonymized and cannot be used to identify you, solely in non-human readable form and content that You share publicly when using the services (e.g, user-generated content) for purposes of delivering tailored advertising.

We neither have access to, nor does this Policy govern, the use of cookies or other tracking technologies that may be placed on Your computer, mobile phone, or other device You use to access the Services by non-affiliated, third-party ad technology, ad servers, ad networks or any other non-affiliated third parties. Those parties that use these technologies may offer You a way to opt out of ad targeting as described below. You may receive tailored advertising on Your computer through a web browser. If You are interested in more information about tailored browser advertising and how You can generally control cookies from being put on Your computer to deliver tailored advertising, You may visit the Network Advertising Initiative's Consumer Opt-Out [link](#) or the Digital Advertising Alliance's Consumer Opt-Out [link](#) to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for display advertising or customize Google display network ads, You can visit the Google Ads Settings [page](#).

When using a mobile application you may also receive tailored in-application advertisements. Each operating system, iOS for Apple phones, Android for Android devices and Windows for Microsoft devices provides its own instructions on how to prevent the

delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems in order to opt-out of tailored in-application advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or contact the applicable platform operator.

Please note that to the extent advertising technology is integrated into the Services, You may still receive advertisements on other websites and mobile applications even if You opt-out. In that case, the advertising will not be tailored to Your interests. Also, we do not control any of the above opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices You make using these mechanisms or the continued availability or accuracy of these mechanisms.

## 6. Our Policy Concerning Children

We recognize the privacy interests of children and We encourage parents and guardians to take an active role in their children's online activities and interests. Children under the age of 13, or 16 if such children resides in the European Economic Area, should not use or attempt to use Our Services. If We learn that We have collected personal information (as defined by applicable law) from a child under 13 or a child under 16 in the European Economic Area, We will take reasonable steps delete such information.

Parents who believe that Own The Vision Academy might have collected personal information from a child under the age of 13 may submit a request to [privacy@OTVAcademy.com](mailto:privacy@OTVAcademy.com) and request that the information be removed.

## 7. How We Use the Information We Collect

Own The Vision Academy may use the information We collect through Your use of the Services to:

- Provide, administer, and facilitate Your use of the Services, including to display customized content;
- Process or fulfill Your request(s) and/or order(s) for Courses, products, services, information or features;
- Communicate with You concerning Your Account by:
  - Responding to Your questions or concerns;
  - Sending You Service and administrative messages and information, including comments from Instructors or teaching assistants, those about changes to the Service, and updates to our Terms of Use, and Privacy Policy;
- Emailing You information or providing in app messages about Your progress in Courses, rewards programs, new services, new features, promotions, newsletters, and other available Courses, which You can opt out of at any time;
- Sending push notifications to Your Wireless device to provide updates and other relevant messages. You can manage push notifications from the "options" or "settings" page for the mobile application.
- Understand and improve the Services and develop new products, services or features;
- Enable User-to- User communication and interaction;
- Manage Your Account preferences, establish Your Profile and Registration Information;

- Facilitate the technical functioning of the Services, including without limitation to troubleshoot and resolve issues, secure the Services; and prevent fraud and abuse
- Respond to customer support questions and issues and resolve disputes;
- Create, review, analyze and share Technical Information;
- Analyze trends and User traffic, track purchases and usage information;
- Advertise our Services on third party websites or mobile applications
- Market, process or fulfill Promotions administered or sponsored by Own The Vision Academy;
- Solicit feedback from Users;
- As required or permitted by law;
- As We, in Our sole discretion, otherwise determine to be necessary or required to ensure the safety and/or integrity of Our Users, employees, third parties, members of the public, and/or our Services;
- Identify unique users across devices; or
- Tailor advertisements across devices.

## 8. When and How We May Share/Disclose Your Information with Third Parties

We will share Your information which may include Registration Information, Profile Information, and Shared Content and Course Information) with the following third parties or under the following circumstances or as otherwise described in this Privacy Policy:

### About You with the Instructor:

We may share Course Information, course, assignment, and quiz completion activity, and certain Registration Information (except for your email address) and Profile Information with Instructors or teaching assistants of the Courses in which You enroll or for which You request information. If You communicate with an Instructor, such as by asking a question, that Instructor will be able to view Your name. We will not share Your email address with Instructors or teaching assistants.

### Third Party Business Partners, Service Providers, Contractors or Agents

We may share Your information with third party companies that perform services on Our behalf, including for payment processing, order fulfillment, data analysis, marketing services, advertising services (including but not limited to retargeted advertising), e-mail and hosting services, and customer services and support. An example of these third party companies includes, but is not limited to Adroll. These third party service providers may access Your personal information, and are required to use it solely as directed by Us for the purpose of Our requested service.

We may also share Your information with third party companies that we partner with to provide certain services to You in connection with the Services, including but not limited to Estacio (Our partner in Brazil), Benesse (Our partner in Japan), or other similar partners. Those partners' collection and use of information is subject to their privacy policies and other terms. You should review such privacy policies, terms, and other agreements.

### About You with other Users

As mentioned above your Profile Information may be publicly viewable, including to other Users. In addition, if you ask a question to an Instructor or Teaching Assistant, information about you, such as your name, may be publicly viewable by other Users.

## Analytics and Data Enrichment Services

As discussed above, We use third-party analytics such as Full Contact, Google Analytics, Mixpanel, and Hotjar to help understand Your usage of our services and to improve our Service. We also use data enrichment services such as Clearbit, Intercom, and InsideView. We may provide Your contact information, Registration Information, Technical Information, Usage Data, or de-identified data or to data enrichment services to such third party analytics and data enrichment service providers, which match such information with publicly available database information, including contact and social information from other sources, such as Your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses. We use this combined information to communicate with You in a more effective and customized manner.

## Business Transfers, Sales, Mergers, or Divestitures

In the event that Own The Vision Academy undergoes a business transition, such as a merger, acquisition, corporate divestiture or dissolution (including bankruptcy), or a sale of all or a portion of its assets, We may share, disclose or transfer all of Your information to the successor organization in such transition or during steps in contemplation of such activities (e.g., due diligence).

## With Your Permission

We may share information with Your consent to third parties not within scope of this Privacy Policy.

## Aggregate or De-identified Information

We may disclose or use aggregate or de-identified information for any purpose.

## Promotions

We may share Your information in connection with any Promotion You enter on or through the Services, as necessary to administer, market, sponsor, or fulfill the Promotion or as required by applicable laws, rules or regulations (for example, to provide winners' lists or make required filings as appropriate) or in accordance with the applicable rules of the Promotion. We may share Your information with a third party assisting us in administering the Promotion.

## Advertising of Third Party Products/Services

While we do not currently offer advertising on the Services, if we do offer advertising in the future, we may use and share with third party advertisers (and other third parties) certain Technical Information, Usage Information and/or Aggregate Information to show general demographic and preference information among our Users. We may also allow advertisers

to collect Technical Information or Aggregate Information, which they may share with Us, through the use of tracking technologies like cookies and web beacons. The information collected may be used to offer You targeted ad-selection and delivery in order to personalize Your User experience by increasing the likelihood that advertisements for products and services You see will appeal to You, a practice known as behavioral advertising, and to undertake web analytics (i.e. to analyze traffic and other end User activity to improve Your experience). To learn more about behavioral advertising or to opt-out of this type of advertising for participating ad networks, You can visit the Network Advertising Initiative [website](#). If You are located in the European Union and would like to opt-out, please visit [this page](#). Please note this does not opt You out of being served ads. You will continue to receive generic ads. We do not control the above opt-out tools and are not responsible for their operation or which companies choose to participate in these programs.

## Social Media Features

Our Services may include social media features, such as the Facebook Like button. Our integration of these features may allow third party social media provided to collect certain information such as Your IP address, which page You are visiting when using Our Services, and to set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly through the use of Our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

## Safety, Security, Cooperation with Law Enforcement, & Compliance with Legal Obligations

We may disclose Your information to third parties, if We, in our sole discretion, have a good faith belief that disclosure is: (1) permitted or required by law; (2) requested in connection with or relevant to a judicial, governmental or legal inquiry, investigation, order, or proceeding; (3) required or reasonably necessary pursuant to a valid subpoena, warrant or other legally valid inquiry or request; (4) reasonably necessary to enforce Our Terms of Use, this Privacy Policy, or any other legal agreements; (5) required to detect, prevent, or otherwise address fraud, abuse, misuse, potential violations of law (or rule/regulation), and/or security or technical issues; or (6) required or reasonably necessary in Our discretion to protect against imminent harm to the rights, property or safety of Own The Vision Academy, Our Users, employees, members of the public and/or our Services. We may also disclose information about You to Our auditors or legal advisors in conjunction with accessing Our disclosure obligations and/or rights under this Policy.

## 9. How Do We Keep Your Information Secure?

Own The Vision Academy takes appropriate security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of, data that You share and We collect and store. These measures vary based on the sensitivity of the data we collect and store. Unfortunately, however, no system can be 100% secured, and We cannot guarantee that communications between You and Own The Vision Academy, the Services, or any information provided to Us in connection with the information We collect through the Services will be free from unauthorized access by third parties.

Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of User information at any time. Your password is an important component of Our security system. As such, it is Your responsibility to protect it. Do not share Your password with any third parties. If Your password has been compromised for any reason, You should change it immediately and contact [support@OTVAcademy.com](mailto:support@OTVAcademy.com) with any concerns.

## 10. Your Choices Regarding the Use of Your Information

You can always choose not to provide certain information to Us but You may not be able to use certain features of the Services. If You do not wish to receive promotional communications from Us, You can opt-out by: (i) following the unsubscribe instructions provided in the promotional communication You receive; or (ii) managing Your e-mail preferences by signing into Your Account, clicking on the Account Settings link under the Your Profile button in the site header, and navigating to the Notifications tab.

Please note that despite Your opt-out choice or indicated email preferences, We will still send You transactional and/or relationship messages regarding the Services, including, for example, administrative confirmations, order confirmation, important updates regarding the Services, and notices regarding our policies.

The browser You use may provide You with the ability to control cookies or other types of local data storage. Your Wireless Device may provide You with choices around how and whether location or other data is collected and shared. Own The Vision Academy does not control these choices, or default settings, which are offered by makers of Your browser or mobile device operating system.

To prevent Google Analytics from using Your information for analytics, You may install the Google Analytics Opt-out Browser Add-on by clicking [here](#). To opt out of Hotjar's use of Your information for analytics click [here](#). To opt out of Mixpanel's use of your information, click [here](#). For Your choices with respect to InsideView, please click visit [here](#). For your choices with respect to Clearbit, please click [here](#).

You may also have other choices as described in the Advertising of Third Party Products/Services section.

If You have any questions about Your information, our use of this information, or Your rights when it comes to any of the foregoing, contact us at [privacy@OTVAcademy.com](mailto:privacy@OTVAcademy.com).

## 11. California Online Privacy Protection Act Notice

We are committed to providing You with meaningful choices about the information collected on our Services for third-party purposes, and that is why we provide information and choices discussed throughout this Privacy Policy. However, we do not recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is currently still working on Do Not Track standards, implementations and solutions.

## 12. How to Access & Update Your Information

You may access and update Your information that Own The Vision Academy collects and maintains in the following ways:

You may update the information You provide directly to Own The Vision Academy by logging into Your Account and updating Your Account information at any time. You may also submit any requests for access to Your personal data to [privacy@OTVAcademy.com](mailto:privacy@OTVAcademy.com) or in writing to Attn Privacy/Legal Own The Vision Academy, Inc. 600 Harrison Street, 3rd Floor, San Francisco, CA 94107. Please allow up to thirty (30) days for a response.

To manage the information Own The Vision Academy receives about You from a Third Party Platform or Wireless Device, please follow the instructions provided by the Third Party Platform or Wireless Device provider for updating Your information and changing Your privacy settings. Once Own The Vision Academy receives Your information from a Third Party Platform or Wireless Device, that information is stored and used by Own The Vision Academy in accordance with this Privacy Policy.

### 13. How to Delete Your Account and what Happens when Your Account is Terminated or Deleted

#### Deactivating Your Account

If You are a Student, and wish to delete Your Student Account, You may do so by following the steps provided in your account settings page.

If You are an Instructor, and wish to delete Your Instructor Account, You may do so by following the steps provided in your account settings page.

Should You require any assistance or encounter any difficulty in deleting Your Account You may also contact Us via email at [support@OTVAcademy.com](mailto:support@OTVAcademy.com), and We will make commercially reasonable efforts to respond to Your request within 24 hours.

#### Account Terminated or Deleted

Please be aware that even after Your Account is terminated or deleted some or all of Your information may still remain visible to others, including but not limited to any information that has been: (a) incorporated into others User's content, comments, postings, submissions, including but not limited to Course comments ; (b) copied, stored or disseminated by other Users; (c) shared or disseminated by You or others such as in a Public Posting; or (4) posted on a Third Party Platform. Termination of Your Account will not result in the removal of information collected and already put in aggregate form or information that cannot, in Our sole discretion, be removed without undue burden to Own The Vision Academy. Own The Vision Academy is not able and/or obligated to remove any of Your information from a Third Party Platform.

Even after You delete Your Account or Your Account is terminated, we may retain Your information as long as we have a legitimate purpose to do so and in accordance with applicable law. In addition, Your information may not be deleted from servers of the Third Party Platform You use to access Our Services. We may retain backup copies of Your information on Our servers or databases (and/or any authorized third party servers or

databases We use) for legitimate purposes such as assist with any legal obligations, resolve disputes, and enforce Our agreements. Such information may be disclosed pursuant to this Privacy Policy regardless of whether Your Account is deleted or terminated.

## 14. Modifications to this Privacy Policy

From time to time, We may update this Privacy Policy. If We make any material change to this Privacy Policy. We will notify You via email or through notification posted on our website, and as required by applicable law. Modifications will become effective on the day they are posted unless stated otherwise.

As permitted by applicable law, if You continue to use the Services, after the effective date of any change, then such access and/or use will be deemed an acceptance of and an agreement to follow and be bound by the Privacy Policy as changed. The revised Privacy Policy supersedes all previous Privacy Policies. For this reason, We encourage You to review this Privacy Policy any time You use the Services. Upon Our request, You agree to accept or sign a non-electronic version of this Privacy Policy and any other policies or agreements set forth or available through any Third Party Platform.

## 15. International Operations: A Note to Users Outside Of the U.S. and the EU

Own The Vision Academy stores information about visitors to Our Services and Users on servers located in the United States. By using our Services, you consent to storage of Your information inside the United States. If You are using the Services from outside the United States and the European Union, please know the data and personal information You submit will be transferred to and stored in servers in the United States or other countries. The data protection and other laws of the United States and/or other countries might not be as comprehensive as those in Your country. By submitting Your data and/or using Our Services, You consent to the transfer, storing, and processing of Your data in and to the United States.

Personal data collected within Switzerland and the European Economic Area ("EEA") may be transferred to, and stored at, a destination outside of Switzerland and the European Economic Area ("EEA"). The data We hold may also be processed by employees operating outside of Switzerland and the EEA who work for Us or one of our affiliates or for one of Our vendors. Such staff may be engaged in, among other things, (i) the processing of transactions and Your payment details and (ii) the provision of support services. By submitting Your personal data or engaging in Own The Vision Academy Courses, You agree to this transfer, storing or processing.

## 16. Your California Privacy Rights

California residents have the right to receive, once a year from Us: a) information identifying any third party company(ies) to whom Own The Vision Academy may have disclosed (within the previous calendar year) Your personal information for that company's direct marketing purposes; and b) a description of the categories of personal information disclosed. If You are a California resident and wish to obtain such information, submit a request to Us at [privacy@OTVAcademy.com](mailto:privacy@OTVAcademy.com); when you request the information, use the phrase

“California Shine the Light Request” to help us appropriately identify your question, and include your mailing address, state of residence and email address so we can provide a response.

## 17. Your Korea Specific Terms

Own The Vision Academy has designated the following Privacy Policy Manager in order to protect Your privacy, answer Your questions, receive comments, and/or resolve disputes regarding our privacy policy:

Designee: Jason Warner, CEO

Department: Privacy Policy

e-mail: [privacy@OTVAcademy.com](mailto:privacy@OTVAcademy.com)

Address: Own The Vision Academy, Inc., Attn: Privacy Policy Manager, 3540 Renaissance Circle, Atlanta, GA 30349

## 18. Questions

Please feel free to contact Us by submitting a request to [privacy@OTVAcademy.com](mailto:privacy@OTVAcademy.com) with any questions, concerns, or disputes You may have regarding our Privacy Policy. Please put "Privacy Policy" in the subject line so Your message can be directed to the correct person(s). You may also contact Us via postal mail at Own The Vision Academy, Inc. Attn: Privacy Policy Manager, 3540 Renaissance Circle, Atlanta, GA 30349

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.



## Own The Vision Academy Cookies Policy

Effective Date: January 1, 2020

### What are cookies?

Cookies are small text files placed onto your computer or device as you browse the Internet. Cookies can be used to collect, store and share bits of information about your activities across websites and services, including on Own The Vision Academy. They also allow us to remember things about your visit to Own The Vision Academy, such as your preferred language and other choices/settings and generally make the site easier for you to use.

Own The Vision Academy uses both session cookies and persistent cookies. A session cookie is used to identify a particular visit to Own The Vision Academy. These cookies expire after a short time, or when you close your web browser after using Own The Vision Academy. We use these cookies to identify you during a single browsing session, such as when you log into Own The Vision Academy. A persistent cookie will remain on your devices for a set period of time specified in the cookie. We use these cookies where we

need to identify you over a longer period of time. For example, we would use a persistent cookie if you asked that we keep you signed in.

## Why does Own The Vision Academy use cookies and similar technologies?

Own The Vision Academy uses cookies and similar technologies, such as web beacons, browser cookies, pixel tags, or local shared objects (“flash cookies”), to deliver, measure, and improve our services in various ways. We use cookies both when you access our site and services on a browser, as well as through our native mobile app. As we adopt additional technologies, we may also gather additional information through other methods.

We use cookies for the following purposes:

### **Authentication and security:**

- To log you into Own The Vision Academy;
- To protect your security; and
- To help us detect and fight spam, abuse, and other activities that violate Own The Vision Academy’s agreements and terms.

For example, these technologies help authenticate your access to Own The Vision Academy and prevent unauthorized parties from accessing your accounts.

### **Preferences:**

- To remember information about your browser and your preferences; and
- To remember your settings and other choices you have made.

For example, cookies help us remember your preferred language or the country that you are in. We can then provide you with content in your preferred language without having to ask you each time you visit Own The Vision Academy.

### **Analytics and research:**

- To help us improve and understand how people use Own The Vision Academy.

For example, cookies help us test different versions of Own The Vision Academy to see which particular features or content users prefer. We may include web beacons in e-mail messages or newsletters to determine whether the message has been opened and for other analytics. We might also optimize and improve your experience on Own The Vision Academy by using cookies to see how you interact with Own The Vision Academy, such as when and how often you use them and what links you click on.

To help us better understand how people use Own The Vision Academy, we work with a number of analytics partners, including Google Analytics and Mixpanel. These providers use cookies and similar technologies to help us analyze how users use the Services, including by noting the third-party Services from which you arrive. The information collected will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of Own The Vision Academy. To prevent Google Analytics from using

your information for analytics, you may install the Google Analytics Opt-Out plugin by [clicking here](#), and you may also use Mixpanel's opt out by [clicking here](#).

We don't release the information collected from our own cookies to any third parties, other than to our service providers who assist us in these activities.

#### **Personalized content:**

- To customize Own The Vision Academy with more relevant content.

#### **Advertising:**

- To provide you with more relevant advertising.

As explained further in our [Privacy Policy](#), third-parties whose products or services are accessible or advertised via Own The Vision Academy may use cookies to collect information about your activities on the Services, other sites, and/or the ads you have clicked on. This information may be used by them to serve ads that they believe are most likely to be of interest to you and measure the effectiveness of their ads. Targeting and advertising cookies we use may include [Google Analytics](#), [AdRoll](#), [AppNexus](#), and other advertising networks and services we use from time to time.

For more information about targeting and advertising cookies and how you can opt out, you can visit [youronlinechoices.eu](http://youronlinechoices.eu) or [allaboutcookies.org/manage-cookies/index.html](http://allaboutcookies.org/manage-cookies/index.html) . Please note that to the extent advertising technology is integrated into Own The Vision Academy, you may still receive advertising content even if you opt-out of tailored advertising. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

When accessing Own The Vision Academy from a mobile application, you may also receive tailored in-application advertisements. Each operating system, such as iOS and Android, provides its own instructions on how to prevent the delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems in order to opt-out of tailored in-application advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or operating system or contact the applicable platform operator.

#### **What are my privacy options?**

You have a number of options to control or limit how we and our partners use cookies.

- This cookie policy is available at our site.– By continuing to use or access Own The Vision Academy, you are consenting to our use of cookies and related technologies as described in this Cookies Policy.
- Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that you may not be able to sign in, customize, or use some of the interactive features of Own The Vision Academy.

- Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the [Adobe website](#) and make changes at the [Global Privacy Settings Panel](#).
- For general information about cookies and how to disable them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Changes to this Policy

We will notify you of any changes by posting the new Policy on Own The Vision Academy with a new effective date. If we make a material change to this Policy, we will take reasonable steps to notify you in advance of the planned change.

### Questions

If you have any questions about our use of cookies, please email us at