



## **RGI LEARNING, INC.**

### **WEBSITE PRIVACY POLICY**

EFFECTIVE NOVEMBER 1, 2010

Thank you for visiting the RGI Learning, Inc. ("RGI") website (the "Website") and reviewing our privacy policy. The information we receive depends on what you do when you visit our site. The essence of our privacy policy is simple and clear: we will collect **no** personal information about you when you visit our Website unless you voluntarily choose to provide that information to us, for example, by entering information in a voluntary online form, sending us an email, registering for an online account, or by performing an online service transaction using an assigned user ID and password.

Here is how we handle information about your visit to our Website and some answers to common questions:

#### **1. If I only browse the Website, read pages, or download information, what information do you collect and how do you collect it?**

If you do nothing during your visit but browse through the Website, read pages, or download information, we will gather and store certain information about your visit automatically. Your web browser software transmits most of this information to us. This information does not identify you personally.

We automatically collect and store only the following information about your visit:

- The numeric IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you access the Website. Our software can then map these IP addresses into Internet domain names, for example, "xcompany.com" if you use a private Internet access account, or "yourschool.edu" if you connect from a university's domain.
- The type of browser and operating system used to access the Website.
- The date and time you access the Website.

- The pages you visit, including graphics loaded from each page and other documents you download, such as PDF (Portable Document Format) files and word processing documents.
- If you linked to the Website from another website, the address of that website. Your web browser software transmits this information to us.

We use this information to help us make our site more useful to visitors -- to learn about the number of visitors to our site and the types of technology our visitors use.

## **2. What are “cookies” and how does RGI use them?**

As part of offering and providing customizable and personalized services, RGI uses cookies to store and sometimes track information about you. A cookie is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. On RGI pages where you are prompted to login or that are customizable require that you accept cookies. (See "*What are my choices regarding collection, use and distribution of my information?*" for more information on cookies.)

Generally, we use cookies to:

- Remind us of who you are. We can then access your account information (stored on our computers) and can deliver to you a better and more personalized service. This cookie is set when you register or "Log In" and is modified when you "Log Out" of our services. This is essential for our online courses to keep track of your progress and return you to the same location.
- Estimate our audience size. Each browser accessing RGI is given a unique cookie which is then used to determine the extent of repeat usage, usage by a registered user versus by an unregistered user, and to help target advertisements based on user interests and behavior.

## **3. When is personal information collected, what is collected, and how is it used?**

- RGI may ask for your e-mail address to process various applications, for example, access to our online courses, requests for site feedback, surveys, and contests.
- When you perform a purchase transaction through our Website, we will log the user's login name for billing.
- When you use our Website to place a purchase order and pay by credit card, we ask for the cardholder's name, address, account number, card expiration date, and security code to pay for any items that you purchase.
- You may choose to subscribe to a newsletter or blog that may be offered by RGI. You may unsubscribe at any time.
- Registered users can edit or delete their account information by e-mailing, phoning, or faxing RGI at the locations indicated in "*Contact Us*".

All of these activities are purely voluntary. You will always have the option of whether to perform the transaction and provide this information. Please understand, however, that to open an online service account or perform a service transaction, you will be required to provide some personal information. Whether to perform the transaction is up to you.

#### **4. With whom is my personally identifiable information shared?**

We will not sell or rent your personally identifiable information to anyone.

As a general rule, RGI will not disclose any of your personally identifiable information except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it or when:

- We need to share your information to provide the product or service you have requested. For example, we use a third party billing company, and we send information for billing purposes only.
- We need to send the information to companies who work on behalf of RGI to provide a product or service to you. (Unless we tell you differently, these companies do not have any right to use the personally identifiable information we provide to them beyond what is necessary to assist us.)
- We are required to do so by law, subpoena, court order or legal process.
- We find that your actions on our Websites violate the RGI Terms of Service or any of our usage guidelines for specific products or services.

RGI is located in the United States of America (see "*Contact Us*"). RGI collects certain personally identifiable information that may be processed in a jurisdiction other than that in which you are located. Your personally identifiable information may then be accessible to law enforcement and national security authorities of the jurisdiction in which the data is processed.

#### **5. What are my choices regarding collection, use, and distribution of my information?**

RGI may, from time to time, send you email regarding our products and services. In addition, if you indicated upon registration that you are interested in receiving offers or information from RGI and our partners, we may occasionally send you direct mail about products and services that we feel may be of interest to you. Only RGI (or agents working on behalf of RGI) will send you these direct mailings. If you do not want to receive such mailings, simply tell us.

You also have choices with respect to cookies. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies you will be unable to use those RGI services that require registration to participate including access to the RGI online courses.

RGI does not sell or rent user information to anyone. We will notify you at the time of data collection or transfer if your data will be shared with a third party and you will always have the option of not permitting the transfer. If you do not wish to allow your data to be shared, you can choose not to use a particular service or not to participate in certain promotions or contests.

## **6. How does RGI protect my personal financial information?**

We take very seriously the integrity of the information and systems that we maintain. As such, we have instituted security measures for all information systems under our control so that information will not be lost, misused or altered.

- Your RGI Website account information is password-protected for your privacy and security. In certain areas, as with credit card transactions, RGI uses industry-standard secure socket layer (SSL) encryption to protect data transmissions. All credit card information is immediately encrypted upon receipt and authentication.
- RGI will never ask you for your password in an unsolicited phone call or in an unsolicited email. Remember to sign out of your RGI account and close your browser window when you have finished your work, to ensure that others cannot access your personal information and correspondence if you use a public computer.
- Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, RGI cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems.

## **7. Links to Other Sites**

Advertisers or websites that have links on our site may collect personally identifiable information about you. The information practices of those Web sites linked to RGI are not covered by this privacy statement.

Once you connect to any external websites via a link to that site on our Website, you are subject to the privacy policy of the new site.

## **8. Changes to this Privacy Policy**

RGI may, with the necessary approvals, revise this policy from time to time. If we make any substantial changes we will notify you by posting a prominent announcement on our pages. This is a statement of policy and should not be interpreted as a contract of any kind.

## **9. Contact Us**

This Site is owned, developed and maintained by RGI Learning, Inc. We welcome your comments, questions or concerns. You may contact us as follows:

By Phone: 866-744-3032

By Fax: 866-744-3032

By E-mail: [admin@rgilearning.com](mailto:admin@rgilearning.com)