

## Privacy Policy

Last Updated October 1, 2024

### General Information

Protecting your personal information is our priority. This privacy policy (“**Policy**”) describes the data practices of Veritas Press LLC (collectively, “**we**”, “**us**,” “**our**,” or “**Company**”), covering the websites <https://veritaspres.com> and <https://vpsa.veritaspres.com> (the “**Websites**”) and any other Company products, software applications, and other data processing activities (collectively “**Services**”). By using the Services, entering into agreements with Company, or otherwise communicating with Company, you are consenting to this Policy and the processing of your data in the manner set forth in this Policy. This Policy should be read in conjunction with the Company’s Terms of Service, as amended from time to time (the “**Terms**”), which are incorporated herein by reference. If you do not agree with the terms set forth in this Policy or the terms and conditions set forth in the Terms, please do not use the Services or submit any communications to Company.

We reserve the right to change this Privacy Policy at any time in our sole discretion. We will provide you with notice of such a change. Notice of any changes to the Privacy Policy will be accomplished upon Company sending you an email to the address listed in your account notifying you of such changes and/or Company announcing such changes through the Services. Such changes will go into effect immediately upon your access of the Services after you are given notice, as described herein. Your continued use of the Services following the notice of any changes to this Privacy Policy constitutes your acceptance of such changes. Any information collected by the Services will be dealt with in accordance with the version of this Privacy Policy that was in place at the time of collection.

### 1. Information Collected

#### a. User Provided Information

To provide users, with the best possible experience, we may collect personally identifiable information (“**Personal Information**”). Personal Information is any information that can be used to identify you or your household or to contact you online or offline and includes, but is not limited to, your username and email. The Services may collect Personal Information when it is provided to us, such as when you use our Services or attempt to contact us.

#### b. Information that is Automatically Collected

We and our analytics and advertising service providers use cookies, which are small text files that help store user preferences and activity, similar technologies such as web beacons, pixels, ad tags, logs, and SDKs, which are blocks of code provided by our service providers that may be installed in our mobile and online applications, to recognize you when you visit our Services, and to collect information such as the number of visits, which features, pages, or content are popular, and to measure your browsing activities. These technologies allow us to optimize the operation of our Services, including by allowing us to help ensure our Services are functioning properly and ultimately improve the Services. Examples of Personal Information collected via cookies includes, but is not limited to, Personal Information such as your Internet Protocol (“IP”) address, other unique user identifiers, your mobile device and browser type identifiers, software and system type, and information about your use of the Services, including the duration of time you access or use the Services and information about Services performance analytics, including crashing, network, and tracing. You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if you do this, you may not be able to use all the features of the Services to the fullest extent possible.

Our Services also collect information about your interactions, including navigation paths, search queries, crashes, timestamps, purchases, clicks and shares, and referral URLs. We may combine this data with Personal Information and device-identifiable information (“DII”). For efficiency’s sake, information about your interactions may be transmitted to our servers while you are not using the Services.

c. Categories of Personal Information We Collect

Category Number	Category	Examples
1	Identifiers	<p>Your username, email address, birthday, and time zone are collected when you create an account on the Websites.</p> <p>We may also collect a nickname, gender, year the child entered the first grade, photograph, and mobile number if you provide such information voluntarily.</p> <p>We also collect your IP address for the purpose of providing you with custom content, including advertisements</p>

		<p>targeted to you, which we think will be beneficial to you, that appear within the Services. For more information see Sections 3, 4, 5, and 6 below.</p> <p>We collect your address when you purchase physical products.</p>
2	Information that identifies, relates to, or can be associated with a particular individual	Your username, email address, and any identifiers or similar information contained in communications sent by you.
3	Internet activity and electronic network information	<p>We collect traffic data, logs, communication data, and computer, mobile device, and internet connection.</p> <p>We may also process the above information for the purpose of providing you with custom content, including advertisements targeted to you, which we think will be beneficial to you, that appear within the Services. Please note, for these purposes, this information is being shared or in some cases “sold” depending on the definition of terms within your jurisdiction. For more information see Sections 3, 4, 5 and 6 below.</p>
4	Coarse geolocation information	We collect your time zone when you create an account on the Websites.
5	Voice and Video	We collect voice and video information from participants in recorded courses.
6	Commercial information	Records of personal property, products, or services purchased, or other purchasing histories or consuming tendencies.
7	Inferences drawn from Personal Information to create a profile about users’ preferences	We create these profiles for the purpose of providing you with custom content, including advertisements targeted to you, which we think will

		be beneficial to you, that appear within the Services. Please note, for these purposes, the above information is being shared or in some cases “sold” depending on the definition of terms within your jurisdiction. For more information see Sections 3, 4, 5, and 6 below.
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d. Google Analytics

In addition to the foregoing, we have integrated Google Analytics into the Services. Google Analytics is a web analytics service. Web analysis is the gathering, collection and analysis of data about the behavior of visitors to websites. Among other things, a web analysis service collects data on which website directed a user to the Services (so-called referrers), which subpages of the website were accessed or how often and for which period of time a subpage was viewed. We mainly use this analysis to optimize our websites and for the cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Google Analytics uses cookies. The information generated by the cookie about your use of the Services is usually transmitted to and stored in a Google server in the United States. Google might transfer the Personal Information collected via this technical procedure to third party sub processors to accomplish the purpose for which we use Google Analytics.

On behalf of the Company, Google will use this information to evaluate your use of the Services, compile reports on the Services, and to provide us with further services related to the Services. The IP address transferred through your browser to Google Analytics will not be combined with other data held by Google.

You may prevent the collection of the data generated by the cookie and related to your use of the Services (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=e> This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics. Additionally, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Further information and Google's applicable privacy regulations can be found at <https://policies.google.com/privacy> and <https://marketingplatform.google.com/about>.

For more information on how Google uses and processes data, please visit: <https://policies.google.com/technologies/partner-sites>.

#### e. Third-Party Provided Information

We may obtain certain information or Personal Information about you from our third-party payment processor, Authorize.net ("**Payment Processor**") through which you purchase Company's goods or Services. You acknowledge and agree that disconnecting your account from a Payment Processor may affect your use and complete enjoyment of the Services.

For information on how the Payment Processor uses your Personal Information, you may consult the Payment Processor's privacy policy, which may be found at <https://usa.visa.com/legal/global-privacy-notice.html>.

## **2. Children**

Our collection of personal information on Services that are directed to children under 13 ("**Children's Platform**") is intended to follow the principles of the Children's Online Privacy Protection Act ("**COPPA**"), a U.S. law designed to protect the online privacy of children under the age of 13. We will obtain parental consent before asking for personal information on our Children's Platform, unless the request for information falls within an exception that would be permitted under COPPA. When you purchase a course via the Websites, we collect your Personal Information in order to, among other reasons, obtain your consent.

**BY COMPLETING A TRANSACTION ON OUR WEBSITES, YOU CONSENT TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR CHILD'S PERSONAL INFORMATION AS DISCUSSED IN THIS SECTION 2.**

#### A. Information We Collect

When you create an account for your child to use the Services, we collect the child's name, birthday, email address, and time zone. If you choose to provide additional information, we may also collect the child's nickname, gender, year the child entered the first grade, photograph, and mobile number. When your child accesses the Services, we automatically collect and store

usage information as well as information about the device used by your child to access the Service. This data collection is explained in greater detail in Section 1(b) above.

We may record certain courses, and as part of such recordings we will collect participants' voice and video data, which may include your child's voice and video data.

Aside from information made available for other purchasers of the Services, we do not make your child's Personal Information publicly available.

#### B. Accessing and/or Deleting your Child's Information

At any time, you may make any request to review, update, or delete your child's Personal Information, request that we stop collecting the Personal Information or request to remove Personal Information about your child from our Services by contacting us at [info@VeritasPress.com](mailto:info@VeritasPress.com) or 800-922-5082.

#### C. How We Use this Information

We will not condition a child's participation in any activity or service on the disclosure of more personal information than is reasonably necessary to participate in an activity.

We share inferences drawn from Personal Information to create a profile about users' preferences with third parties for the purpose of facilitating targeted advertising, also known as cross contextual behavioral advertising or interest-based advertising (collectively "**Targeted Advertising**").

We use this data to enhance and secure the Services, recognize you upon your return to the Services, improve the Services, offer technical support, and monitor website usage, among other similar objectives. Our use of such information is explained in greater detail in Section 3 below.

#### D. How We Disclose this Information

We may share or disclose, Personal Information, including a child's Personal Information, as needed to provide our Service or with your consent or permission and for the reasons set forth in Section 4(b) below. For example, we may share information with our analytics providers and hosting providers to provide Services for us on our behalf. We may share Personal Information if we have a good faith belief that access, use, preservation, or disclosure of such information is

reasonably necessary to (i) comply with any applicable law, regulation, or enforceable governmental request; (ii) enforce relevant Terms, including investigation of potential violations thereof; (iii) identify, prevent, or address fraud, security, or technical issues; (iv) protect the rights, property, or personal safety of Company, its users, or the public; or (v) as required or permitted by law.

We disclose inferences drawn from Personal Information to create a profile about users' preferences for the purpose of facilitating Targeted Advertising. For more information on this type of processing, including how you can opt out of the transfer of your data for the purposes of Targeted Advertising please see Section 6 below.

If we become involved in a merger, acquisition or other transaction involving the sale of some or all our assets, user information, including Personal Information collected from your child through their use of our Services, could be included in the transferred assets, subject to applicable law.

Our disclosure practices are explained in greater detail in Section 4 below.

#### E. Contact Us

We welcome your questions or comments regarding this Privacy Policy. If you believe that we have not adhered to this Privacy Policy, or if you have any other questions or concerns regarding this Privacy Policy or our use of Personal Information provided by your child, please contact us:

Veritas Press LLC  
2580 Horseshoe Road  
Lancaster, PA 17601  
(800) 922-5082

### **3. How Company Uses Your Personal Information**

We use the information we collect from our Services to provide, fulfill, maintain, protect, and improve our Services, to develop new Services and offerings, and to protect us and our users.

Personal Information is primarily used to provide you the Services or for legitimate business purposes, such as for sending you occasional communications and updates, responding to inquiries, logins, and providing and maintaining the Services. When you contact us, we may keep a record of your communication as well as the other information to help solve any issues

you might be facing. We may use your email address to inform you about our Services, such as letting you know about changes or improvements. For more information on how we use your Personal Information, see Section 1.

We use DII to operate our Services and manage user sessions, including analyzing usage of our Services, preventing malicious behavior and fraud, improving the content, to link your identity across devices and browsers, to provide you with a more seamless experience online, and helping third parties provide relevant advertising and related metrics. We share DII with service providers and processors primarily for advertising and analytics purposes, for external processing, and for security purposes.

#### **4. How Company Shares Information with Third Parties**

However, there are certain circumstances in which we may transfer your Personal Information to third parties, without further notice to you.

We share Personal Information with companies, outside organizations, and individuals for the limited reasons, outlined below:

- a. With your consent - We will share Personal Information with companies, outside organizations or individuals if we have your consent to do so.
- b. To provide the Services to all users - We may record certain courses, and such recordings are made available for streaming on our Websites for other users who have purchased the courses on our Websites. In such recordings we will collect participants' voice and video data, which may include your child's voice and video data.
- c. For external processing - We provide Personal Information to our affiliates, service providers, processors, or other trusted businesses or persons to process it for us, based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures. We may share Personal Information with companies that provide services to us, including companies that assist us with hosting, providing data process services, providing analytics services, account management, technical support, marketing, measurement, and similar services.
- d. For legal reasons - We will use and/or share Personal Information with companies, outside organizations or individuals if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to meet any



applicable law, regulation, legal process or enforceable governmental request, detect, prevent, or otherwise address fraud, security or technical issues or protect against harm to the rights, property or safety of our users or the public as required or permitted by law.

- e. With third-party advertisers - We share the Personal Information outlined above with third parties for the purpose of facilitating Targeted Advertising. As a result, you may see an ad within our Services that is directed to you based on Personal Information processed hereunder. These third-party advertisers may include entities known as “**Data Brokers**,” which means that we do not have a direct relationship with these companies. For more information on this type of processing, including how you can opt out of the transfer of your data for the purposes of Targeted Advertising please see Section 6 below.
- f. In case of a sale or asset transfer - If we become involved in a merger, acquisition or other transaction involving the sale of some or all our assets, user information, including Personal Information collected from you through your use of our Services, could be included in the transferred assets.
- g. In aggregated form for business purposes - We may use or share aggregated information and DII with our partners such as businesses with whom we have a relationship, advertisers, or connected sites. For example, we may share information to show trends about the general use of our Services. We may also share information about general user browsing habits with other users via our dashboard. This type of sharing will not identify a particular user but will instead be an overview of the activity of all users.
- h. To generate and obtain analytics to improve our Services. As part of this, we use Google Analytics.
- i. To send you updates regarding our Services.
- j. We may disclose your Personal Information to our owners, employees, and third-party contractors for the purpose of understanding user behavior and using such information to improve the Services.
- k. We may disclose your Personal Information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (i) conform to the edicts of the law or comply with legal process served on Company; (ii) protect and defend the

rights or property of Company; and/or (iii) act under exigent circumstances to protect the personal or economic safety of users, or the general public.

- I. Notwithstanding the foregoing, we may disclose your Personal Information to other third parties with your consent and direction to do so. When you broadcast information to third-party services, such information is no longer under our control and is subject to the terms of use and privacy policies of such third parties.

In the past 12 months, we have shared the following Personal Information for the purposes described herein:

Category 1: Identifiers

Category 2: Information that identifies or can be associated with a particular individual

Category 3: Internet or electronic network activity information

Category 4: Coarse geolocation

Category 5: Voice and video

Category 6: Commercial information

Category 7: Inferences drawn from Personal Information to create a profile about users' preferences

## **5. Sharing of Personal Information for the Purposes of Targeted Advertising**

We disclose the following information to our service providers for the purposes of targeted or cross contextual behavioral advertising. In some jurisdictions, this may also be referred to as the "sale" or "sharing" of your Personal Information:

Category 1: Identifiers

Category 2: Information that identifies, relates to, or can be associated with a particular individual

Category 3: Internet or electronic network activity information

Category 4: Coarse geolocation

Category 5: Voice and video

Category 6: Commercial information

Category 7: Inferences drawn from Personal Information to create a profile about Users' preferences

This Personal Information was shared with (1) third party advertisers for the purpose of providing you with targeted advertisements that you may find beneficial, these may include

Data Brokers; (2) with third party companies for the purposes of preventing ad fraud or similar; and (3) with third party analytics companies for the purpose of analyzing the effectiveness of the targeted advertisements and determining the advertisements that will be most beneficial to you. For more information on how to “opt-out” of the sharing of your Personal Information for Targeted Advertising, see Section 6 below.

## **6. Notice of Right to Opt-Out of Sharing/Sale of Information**

We take your data privacy seriously and only want to process your Personal Information in ways that are beneficial to you. Accordingly, you have the right, at any time to object to and otherwise direct us not to share your Personal Information for the purposes of Targeted Advertising. You can opt out of this type of advertising and information sharing by clicking [info@VeritasPress.com](mailto:info@VeritasPress.com). You may still see Targeted Advertising on third-party websites, over which we have no control. Additionally, you can opt out by selecting the applicable settings within your browser or on your mobile device. You can also opt out of participating companies by visiting the following sites:

- <http://optout.networkadvertising.org/>
- <https://youradchoices.com/control>.
- <http://optout.aboutads.info/>
- <http://youonlinechoices.eu/>
- <https://globalprivacycontrol.org/>
- <https://tools.google.com/dlpage/gaoptout>
- <https://support.apple.com/en-us/HT202074>

If you wish to similarly opt out of Targeted Advertising on mobile devices, you can enable the “Limit Ad Tracking” flag on the device. Enabling Limit Ad Tracking sends a flag to third parties that you wish to opt out of Targeted Advertising on that device, and major mobile platforms require companies to honor this flag. Screenshots on how to find these options on various devices are available here: <http://www.networkadvertising.org/mobile-choices>. To learn how to opt out on other devices, please visit the platform’s privacy policies for more information.

## **7. More on Third Parties**

While we strive to work with reputable companies with good privacy practices, this Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed or linked to you on the Services, or to the privacy policies of third parties to whom we share Personal Information for the purposes of Targeted Advertising. We also do not

control the privacy policies and your privacy settings with third parties, including social networks and ad networks. We encourage you to be aware when you leave the Services and to read the privacy statements of any other site or application that collects Personal Information.

## **8. Security of your Personal Information and Data Transfer**

We will take reasonable and appropriate security measures to protect your Personal Information from unauthorized access, disclosure, alteration, or destruction. Unfortunately, no data transmission over the Internet or any mobile or wireless network is 100% secure. As a result, while we strive to protect your Personal Information, you agree and acknowledge that: (i) there are security and privacy limitations inherent to the Internet and wireless and mobile networks which are beyond our control; and (ii) security, integrity, and privacy of all information and data exchanged between you and Company cannot be guaranteed. We recommend that you do your part in protecting your Personal Information. This includes guarding against unauthorized access to your email and social media accounts including via 2-factor authentication, if applicable, by ensuring no one else uses your device or computer when you are logged in, by logging off from the Services when they are not in use, by keeping your password and other Personal Information confidential, and by taking precautionary steps to guard the physical safety and security of your device or computer.

Our Services are located in the United States and your Personal Information may be transferred or stored in the United States. The data protection laws and rules in the United States may be different than those where you live. We rely on various legal mechanisms to help lawfully support transfers of information outside the country of collection where appropriate. To the maximum extent permitted by applicable law, you hereby authorize Company to process your information in the United States or any other locations where we operate.

## **9. How Long Will Your Information Be Stored**

We generally store Personal Information for as long as we need it to accomplish the business purpose for which such Personal Information is processed. Notwithstanding the foregoing, we may retain your Personal Information where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **10. Email Communications**

From time to time, we may contact you via email for the purpose of providing updates, announcements, alerts, confirmations, and/or other general communication regarding the Services. To improve the Services, we may receive a notification when you open an email from Company or click on a link therein.

You may opt out of the receipt of these communications at any time by following instructions in each email, by clicking on the Unsubscribe button, and/or by emailing us at [info@VeritasPress.com](mailto:info@VeritasPress.com).

## **11. Merger or Sale**

The information collected pursuant to this Policy, including Personal Information, is considered an asset of Company. In the event Company or some or all of the assets related to the Services are acquired by another entity through a sale, merger, or some other change of ownership transaction, Company reserves the right to transfer or assign the information collected pursuant to this Policy.