

GHANA PRIVACY POLICY FOR SANDLER ONLINE®

This Privacy Policy describes Sandler Systems, Inc.'s ("Sandler", "we" or "us") practices regarding the collection, use and disclosure of the information we collect from and about you when you use Sandler's learning management system known as *Sandler Online*.

By accessing or using Sandler Online, you agree that you have read and understand this Privacy Policy and that you accept and consent to the privacy practices and uses or disclosures of information about you that are described herein.

In order to deliver personalized and relevant information to you through Sandler Online, we collect certain information from users. Please do not provide any sensitive information or health information. We do not want, nor will we ask for sensitive information. Sandler Online is not designed to process sensitive information.

Information We Collect

We collect personal information, such as your name, email address, phone number and contact information, company name, title, division, industry and location when you log in. We also collect other information, such as your trainer's name, manager's name, franchisee affiliation, survey feedback and referral names when you use Sandler Online. We may also deliver surveys and inquire about voluntary client testimonials based on the programs offered. If you make a purchase, we will collect your payment, billing and shipping information.

We also collect information about you from third party sources, such as your employer, other Sandler franchisees, and our third-party partners. Information we collect about you from these third parties includes your name, title, company name, address, phone number, referring training location, website address, email address, social media profiles, and demographic data such as number of employees at your company and course content interests. This Privacy Policy describes Sandler's collection and handling of your personal information, you should also refer to the privacy notices of any third parties in respect of their disclosure of your personal information to us.

Information We Automatically Collect

We may automatically collect the following information about your use of Sandler Online through cookies, web beacons, and other technologies: your domain name; your browser type and operating system; web pages you view; links you click; your IP address; the length of time you visit or use Sandler Online; and the referring URL, or the webpage that led you to Sandler Online. Some of this information may be treated as personal information, in accordance with applicable local laws. We may combine this information with other information that we have collected about you, including, personal information. Please see the section "How We Use Cookies" below for more information.

How We Use Cookies

We use "cookie" technology to collect additional web site usage data and to improve Sandler

Online and our service. A cookie is a small data file that we transfer to your computer's hard drive through your web browser (if you allow) that enables us to recognize your browser and capture and remember certain information. We can correlate the cookie to the user's login name in our database and then determine the name of the user. We do not otherwise use cookies to collect personally identifiable information. We use cookies to compile aggregate data about site traffic and site interactions, in order to improve the LMS and our products and services, to offer better site experiences and tools in the future, and to display personalized content and materials (including marketing materials) within the LMS.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. If you turn cookies off, some features will be disabled, and some of the features that make Sandler Online experience more efficient may not function properly.

Clear GIFs, pixel tags and other technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags) in connection with Sandler Online to, among other things, track the activities of visitors and users, help us manage content, and compile statistics about usage of Sandler Online. We and our third-party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Third-Party Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of Sandler Online. We also may use other analytic means to evaluate Sandler Online. One of our providers is Google Analytics and more information about the ways in which they process your personal information can be found here: <https://www.google.com/policies/privacy/partners>. We use these tools to help us improve Sandler Online, the site's performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties.

Do-Not-Track. Currently, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies).

Use of Your Information

We may use the information we collect from you in the following ways:

- To provide our services to you, including to deliver appropriate training and email training notifications to you and/or your manager.
- To track your progress in completing courses.
- To deliver products and certificates for selected programs.
- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To ask for ratings and reviews of our services and products.

- To improve Sandler Online in order to better serve you.
- To contact you for marketing purposes, including to send you personalized and relevant information through email and text messaging in accordance with local law and consent requirements. You may unsubscribe from our mailing lists at any time by using the “unsubscribe” feature in any marketing emails you receive from us.
- To provide customer support and to follow up with you after correspondence (live chat, email or phone inquiries).
- To understand the lessons learned.
- To calculate certification credit hours.
- To offer and deliver content based on vertical markets and/or your initial training path.
- To comply with applicable legal obligations, including responding to a subpoena or court order.
- Where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of our Terms of Use or this Policy.

Security

We have put in place security measures to safeguard and secure the information we collect in Sandler Online. Nonetheless, the transmission of information via the Internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically in Sandler Online, and transmission of such data is therefore entirely at your own risk.

Disclosing Your Information

The information you enter into Sandler Online may be shared amongst our Sandler trainers and franchisees, and your employer, supervisors and managers, who may also use your information for the purposes set forth in the “Use of Your Information” section above. We do not allow the franchisees and trainers to use the personal information you enter into Sandler Online for their own direct marketing use. We also may disclose the information we collect from you to third-party vendors, service providers, contractors or agents who perform functions on our behalf. We take appropriate steps to ensure that such third parties treat your personal information with the same consideration that we do. We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information.

Sandler Systems, Inc. is a U.S. company, and our trainers and franchisees may be based in the United States and in other jurisdictions that do not have equivalent data protection laws to your home jurisdiction. In accordance with local laws, we will take steps to ensure that your personal information receives an adequate level of protection as required by applicable law, such as through the use of the EU standard contractual clauses approved by the European Commission, relevant national equivalents outside the EU, or other safeguards as permissible. By providing us with your personal information, you expressly acknowledge that we may transfer your personal information to, or access it in, jurisdictions which may not provide equivalent levels of data protection to your home jurisdiction.

We may also share information in the following circumstances:

- ***Business Transfers.*** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.
- ***In Response to Legal Process.*** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- ***To Protect Us and Others.*** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Privacy Policy, or as evidence in litigation in which Sandler is involved.
- ***Aggregate and De-Identified Information.*** We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

Third-Party Web Sites and Interaction

Sandler Online may contain links to third-party web sites or applications which are outside our control and are not covered by this Privacy Policy. If you access other sites or applications using the links provided, the operators of those sites may collect information from you which will be used by them in accordance with their privacy policy and terms of use, which may differ from ours. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Users Only of Legal Age of Majority

Sandler Online is designed and may only be used by those who have reached the age of majority (18 years of age in most jurisdictions). By using Sandler Online, you affirm that you are at least 18 years of age or older. We are not liable for any damages that may result from a user's misrepresentation of age.

Access to Information

If you believe that any information we are holding about you is incorrect or incomplete, or have any complaints about Sandler Online, please inform us as soon as possible at the address below. We will respond to your request in accordance with applicable local law.

You can also update certain of your personal information by logging in to your account. Please note that we may maintain a copy of any personal data that you have updated for a period of time as part of our backups and business records; please see the "Retention of Your Information" section below for an explanation of our retention practices. You also have the right to request that we stop processing your personal information in a manner that causes or is likely to cause distress or unwarranted damage by notifying us in writing using the address below.

Retention of Your Information

Sandler Online applies a general rule of keeping your personal information for only as long as is required to fulfil the purposes for which it was collected. However, in some circumstances we may retain personal information for longer periods of time, for instance for research purposes or where we are required to do so in accordance with legal, tax or accounting obligations, or where we would like to have an accurate record of your dealings with us in the event of any complaint or challenge. At the end of the applicable retention period, we will destroy or delete the information in a manner that prevents its reconstruction in an intelligible form.

Changes to this Policy

We do update this Privacy Policy from time to time so please review this Privacy Policy regularly. If we materially alter our Privacy Policy, we will notify you of such changes by posting a notice in Sandler Online. Your continued use of Sandler Online will be deemed your agreement that your information may be used in accordance with the new policy. If you do not agree with the changes, then you should stop using Sandler Online and you should notify us that you do not want your information used in accordance with the changes.

Contacting Us

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at:

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