

GIBRALTAR 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*. This Privacy Policy is applicable to the Sandler Online URLs: <https://learn.sandler.com> and <https://shop.sandler.com>. See a full description of the data controllers to which this Privacy Policy applies at the end of this document.

I acknowledge that I have read and understand this Privacy Policy that explains how Sandler Online processes my personal information.

In order to deliver personalized and relevant information to you through Sandler Online, we collect certain information from users. If you have questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

Information We Collect

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

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. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

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 that we collect automatically

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.

Collecting this information enables us to better understand the Sandler Online users and the visitors who come to our shop, where they come from, and what content in Sandler Online and our shop is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of Sandler Online and our shop to our visitors.

Information that we obtain from third-party sources

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.

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.

Please review our Cookies Policy for more information.

Use of Your Information

We may use the information we collect from you in the following ways relying on one or more of the legal bases for processing as indicated:

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

- To ask for ratings and reviews of our services and products (our legitimate interests).
- To improve Sandler Online in order to better serve you (our legitimate interests).
- 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 (our legitimate interests and/or consent). 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) (contract and our legitimate interests).
- To understand the lessons learned (our legitimate interests).
- To calculate certification credit hours (contract).
- To offer and deliver content based on vertical markets and/or your initial training path (our legitimate interests).
- To comply with applicable legal obligations, including responding to a subpoena or court order (legal obligation).
- 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 (legal obligation and our legitimate interests).

By providing your information to us, you expressly and voluntarily agree to our processing of your information in ways set out by this Privacy Policy.

Legal Basis for Processing Personal Information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), [this interest will normally be to operate our platform and communicate with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests as well] we will make clear to you at the relevant time what those legitimate interests are.

If we ask for consent to use your personal information such as to send you marketing, if you change your mind, you may withdraw your consent at any time.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information or would like to withdraw your consent to processing of your personal information, you can contact us at any time using the contact details provided at the bottom of this Privacy 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.

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.

International Data Transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are a resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our website servers are located in the U.S. and our franchisees and third-party service providers operate around the world. This means that when we collect your information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our franchisees, which require franchisees to protect personal information they process from EEA in accordance with European Union data protection law.

Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our third-party service providers and further details can be provided upon request.

Your Data Protection Rights

You have a right to access, update, correct, or delete your information controlled by us. 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 pieces 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.

EU users have additional rights in respect of your personal information; for example, to access or erase your personal information, object to our use of it, or require it be made available in a portable format, or request restriction of processing. EU users may also withdraw their consent at any time where we rely on the basis of consent for our processing, or lodge a complaint with the relevant supervisory authority. If these rights apply to you, and you would like to exercise them, please contact us using details set out 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 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.

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. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

Contacting Us

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

Privacy Officer
Sandler Systems, Inc.
300 Red Brook Blvd, Suite 400
Owings Mills, MD 21117
USA
410-653-1993
legal@sandler.com

EU Data Controllers: Sandler Systems, Inc. (contact information above) and the corresponding franchisee. The applicable address and contact information of the franchisee can be found here: <https://www.sandler.com/training-centers>.

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