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NOWCE.com PRIVACY POLICY

Roundpoint Inc operate a range of services to online publishers and educators using the NowCE.com website. Protecting your private information is our priority. This privacy policy explains how we handle your personal information, data collection and usage of them. Unless otherwise noted, all references to NowCE and NowCE.com apply inter alia to Roundpoint Inc and vice versa. By using the NowCE.com website, you consent to the data practices described in this statement.

This privacy policy applies to all the products, services and websites offered by NowCE and our affiliates. Some Services provided by other parties 'Providers' which use the NowCE service as a distributor may have privacy policies of their own and should be referred to by users of those services. All Providers who use NowCE as a distributor of their learning materials, courses, tests and examinations must agree to be bound

by the terms of our privacy policy and any issues concerning their use of private information and data should be address directly to that Provider.

In terms of privacy practice between the Provider and end-users then any Provider must expressly accept to be bound by our privacy policies as if they are their own. However, if the Provider publishes their own privacy policy we ask that contributors and end users should read it carefully as it will prevail over any single items that is included in this document. When no such policy is published by the Provider or where an item is omitted from the Provider's published privacy policy then the terms of the NowCE privacy policy shall prevail and by offering a course through NowCE. To this purpose all Providers agree to the provisions of the 'If you engage with a course offered by a named Provider' section of this document.

Need more? For enquiries about our privacy policy, acceptable use and terms of business please email us at support@nowce.com.

We use the term 'course' to describe any learning material, assessment, examination, survey or test of any kind.

If you are a provider of learning material or education courses

- **Your learning material and data is owned by you.** We respect this and don't pass any of it to anyone else except if we are legally required to do so or you have agreed that we may do so.
- **We safeguard your customers and their email addresses.** NowCE is simply a custodian of such data. We don't sell these email addresses and use them only as directed by you and in accordance with this policy.
- **We hold your data securely on servers located in the United States** where we may process data on your behalf and under your direction.

In order to operate our services, NowCE collects information about both you, our customers ("Customers" or "you") and the individuals who participate in, or are invited to participate in and/or respond to, any of your courses.

- **Registration information.** You need a NowCE account before you can provide courses on NowCE. When you register for an account, we collect your username, password and email address and other details which may be made available to your customers.
- **Billing information.** If you make a payment to NowCE we require you to provide your billing details, such as a name, address, email address and financial information corresponding to your selected method of payment (e.g. a credit card number and expiration date or a bank account number). If you provide a billing address, we will regard that as the location of the account holder unless you provide an alternative address
- **Information about your registration, contributors to your courses and users.** You can set various preferences and personal details on your registration and course content pages, or gather and store other information to identify and describe contributors and users of your courses for the purpose of managing your relationship with such contributors and users. You may record responses from users to measure their individual performances and their compliance with any regulation of a mandating authority that accredits your material with their recognition or certification of it.

- **We store your course data** (questions and responses) for you.
- **Other data you intentionally share.** We may collect your personal information or data if you submit it to us for another purpose.

Information we collect when you engage with NowCE

- **Use of NowCE.** We collect usage data about you whenever you interact with our services. Our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses of devices used to access NowCE.
- **Referral data.** If you arrive at a NowCE website from an external source, we record the identity of that source.

1. How does NowCE use the information we collect?

Unless you instruct us otherwise, we treat your course material, questions and responses as information that is private to you.

We only use the course materials you provide in connection with our providing services to you and, on your behalf, to your users only in the specific ways you have elected us to provide them. For example,

- Customer support, which requires us to access your information to assist you
- Use the content of your course material and responses by your readers
- Contributor declarations which are required to be made public
- Your account information for supporting your users
- To aggregate the responses, you receive to your courses and questions in any way to elect us to do so

We internally use your information and certain data to

- To facilitate account creation and the logon process by your contributors and end users
- To contact you about billing-related matters, changes to our services or policies
- To send a confirmation email to confirm a request or order from you or an end user
- To contact you for marketing purposes. We will only do this if you have consented to our contacting you for this purpose
- Monitor, maintain, and improve our services and features
- Understand how people use our services

- To help us evaluate or devise new features
- For our own and for third party service improvements troubleshooting and testing purposes
- For research and development purposes
- To enforce our Terms of Use
- To prevent potentially illegal activities
- To screen for and prevent undesirable or abusive activity such as phishing activities, spam, and fraud
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond

2. With whom do we share or disclose your information?

You have entrusted us with safeguarding the privacy of your information. This trust is very important to us. The only time we will disclose or share your personal information or course data with a third party is where we have given you notice, such as in this privacy policy; obtained your express consent or de-identified or aggregated the information so that individuals or other entities cannot reasonably be identified by it.

We may disclose:

- Your information to our service providers.** But only to the extent necessary for them to perform their services for us. Examples of service providers include payment processors, hosting services, email service providers, and web traffic analytics tools.
- Your account details to your billing contact.** If your details (as the account holder) are different to the billing contact listed for your account, we may disclose your identity and account details to the billing contact upon their request (we also will usually attempt to notify you of such requests). By using our services and agreeing to this privacy policy, you consent to this disclosure.
- Your email address to your organization.** If the email address under which you've registered your account belongs to or is controlled by an organization, we may disclose that email address to that organization in order to help it understand who associated with that organization uses NowCE.
- Your information if there's a change in business ownership or structure.** If ownership of all or substantially all of our business changes, or we undertake a corporate reorganization (including a merger or consolidation) or any other action then, you expressly consent to NowCE transferring your information to the new owner or successor entity so that we can continue providing our services, if required.
- Information you expressly consent to be shared** such as any declarations required to be made public by any mandating authority under whose governance you publish educational materials and courses.

3. What are your rights to your information?

You can:

- a. **Update your account details and personal information.** You can update your registration and other account information on your 'My Registration' page.
- b. **Update or confirm any personal declarations** such as your own credentials statement or disclosures about conflicts of interest. Your contributors can add and edit their own declarations
- c. **Access and correct your personal information.** You may access and correct the personal information that NowCE holds about you by visiting your My Account page or by contacting support@NowCE.com.
- d. **Download/backup your course data.** Depending on what subscription plan you have, we provide you with the ability to export, share and publish your data in a variety of formats. This allows you to create your own backups or conduct offline data analysis.
- e. **Delete your course data.** As long as you maintain an account with us, we may retain your deleted data for a limited time in case you delete something by accident and need to restore it. To the extent permitted by law, we will permanently delete your data if you request to cancel your account. However, if your data was previously made available to the public through a course link, additional copies of your data may remain available on the Internet even after your account has been deleted.
- f. **Cancel your account.** To cancel and delete your account, please contact support@nowce.com

4. Security, cookies and other important information

- a. **Data locations.** Our servers are based in the United States, so your personal information will be hosted and processed by us in the United States. Your personal information may also be processed in, or transferred or disclosed in countries in which NowCE has offices or where you, your contributors and end users may be located.
- b. **Cookies.** We use cookies and similar technologies for several reasons:
 - i. **To make our site easier to use.** If you use the "Remember me" feature when you sign into your account, we may store your username in a cookie to make it quicker for you to sign in whenever you return to NowCE
 - ii. **For security reasons.** We use cookies to authenticate your identity, such as confirming whether you are currently logged into NowCE
 - iii. **To provide you with personalized content.** We may also use cookies to ensure that users can't retake and score ineligible questions for certification that they have already submitted
 - iv. **To improve our services.** We use cookies to measure your usage of our websites and track referral data. This information helps us to develop and improve our services and optimize the content we display to users.
 - v. **Google Analytics.** In addition to the above, we have implemented on our websites and other services certain Google Analytics features that support secure practices including re-targeting

- c. **Safety of Children and COPPA.** Our services are not intended for and may not permissibly be used by individuals under the age of 13. NowCE does not knowingly collect personal data from persons under 13 or allow them to register.

If you engage with a course offered by a named Provider

We will not – under any circumstances – use Respondent Information for any purpose other than to provide services to our Provider Customers

Where a service or course is administered and offered by a named Provider and we host the service on our websites and collect the responses that you submit to the Provider. If you have any questions about such a course that you are taking, please contact the Provider directly as NowCE is not responsible for the content of that course or your responses to it.

Your anonymity depends on how the Provider has configured the course. Contact them directly if this aspect is unclear or you have questions about it.

We don't sell your responses to third parties. We only act as a custodian on behalf of the Provider who controls your data.

If you suspect a course of service violates our privacy policy, terms of business or may an illegal activity report it to us directly.

5. Collection of your Personal Information

Nowce may collect personally identifiable information, such as your name, email address, physical address and personal/professional declarations. NowCE may also collect anonymous demographic information, which is not unique to you, such as about your professional specialty. We may gather additional personal or non-personal information in the future.

Course Engagement and answers to questions. On behalf of the Course Provider, we collect and store the responses that you choose to submit. The Course Provider is responsible for this data and manages it. A Course Provider may ask you to provide personal information or data. If you have any questions about a course you are taking, please contact the Course Provider directly as NowCE is not responsible for the content of any course. The Provider is usually the same person or entity that offered you the course and may have their own privacy policy.

Your responses are owned and managed by the Course Provider. We handle that as being confidential between you and the Course Provider.

See the 'Provider of learning material or education courses' section of this privacy policy document about the NowCE policy for Providers.

Providers must accept our privacy policy as if it were their own. If the Provider publishes their own privacy policy, you should read it carefully as it will prevail over any same item where that item is included in this document. When no such policy is published by the Provider or where an item is omitted from the Provider's published privacy policy then the terms of the NowCE privacy policy shall prevail and by offering a course through NowCE.

Payment Information. NowCE does not store information such as full credit or debit card details. This information may be given direct to the transaction provider who accepts payments on behalf of NowCE and NowCE providers using secure protocols. NowCE does collect information about the value of your transactions, what they were for and when they took place. This enables you to view a record of such payments and is a useful reference for you and your Provider should you wish to discuss any matter connected with your account.

Information about your computer hardware and software may be automatically collected by NowCE. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the NowCE website.

NowCE encourages you to review the privacy statements of websites you choose to link to or from Course Providers so that you can understand how these entities use and share your information. NowCE is not responsible for the privacy statements or other content on websites outside of the NowCE website or by Providers who use the NowCE as a custodian to provide their services to their own customers.

6. Use of your Personal Information

NowCE collects and uses your personal information to operate its website(s) and deliver the services you have requested.

NowCE may also use your personally identifiable information to inform you of other products or services available from NowCE and its affiliates. NowCE may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

NowCE does not sell, rent or lease customer lists to third parties.

NowCE may share data with trusted partners to help perform statistical analysis, send you email or postal mail, and provide customer support. All such third parties are prohibited from using your personal information except to provide these services to NowCE, and they are required to maintain the confidentiality of your information.

NowCE will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on NowCE or the site; (b) protect and defend the rights or property of NowCE; and, (c) act under exigent circumstances to protect the personal safety of users of NowCE, or the public. It may also disclose data about your participation to any institution to which you have agreed by a separate agreement to share information with or for the purpose of securing some form of certified recognition as such may appropriate to an activity offered or sponsored by such a party with whom you have co-joined in any way.

7. What are your rights to your information?

You can:

- g. **Update your account details and personal information.** You can update your registration and other account information on your 'My Registration' page.
- h. **Update or confirm any personal declarations** such as, and where relevant, your own credentials statement or disclosures about conflicts of interest.

- i. **Access and correct your personal information.** You may access and correct the personal information that NowCE holds about you by visiting your My Account page or by contacting the relevant Course Provider.

8. Use of Cookies

The NowCE website may use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your digital device, such as your computer, by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize NowCE pages, or register with NowCE site or services, a cookie helps NowCE to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, where you have paused in an online session and so on. When you return to the same NowCE website, the information you previously provided can be retrieved, so you can easily use the NowCE features that you customized.

You have the ability to accept or decline cookies. You can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the NowCE services or websites you visit.

9. Security of your Personal Information

NowCE secures your personal information from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other websites for transaction processing, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol.

10. Children under Thirteen

Safety of Minors and COPPA. NowCE services and those offered by named Course Providers are not intended for and may not be used by minors. "Minors" are individuals under the age of majority in their place of residence (or under 13 in the United States). NowCE does not knowingly collect personal data from minors or allow them to register. If it comes to our attention that we have collected personal data from a minor, we may delete this information without notice. If you have reason to believe that this has occurred, please contact support@nowce.com.

11. Opt-Out & Unsubscribe

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Email support@nowce.com should you require to opt out of any service.

12. Changes to this Statement

NowCE will occasionally update this Statement of Privacy to reflect company and customer feedback. NowCE encourages you to periodically review this Statement to be informed of how NowCE is protecting your information.

13. Contact Information

NowCE welcomes your questions or comments regarding this Statement of Privacy. If you believe that NowCE has not adhered to this Statement, please contact NowCE at support@nowce.com.

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