



PRIVACY POLICY

Last modified: February 28, 2018

Introduction

Molly Manners, LLC (“Company” “us”, “our” or “we”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the Website www.mollymanners.com (our “Website”) and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party Websites and services, if those applications or advertising include links to this policy.
- Through the Company’s online application form for licensees, and any resulting communications between you and Company.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and licensees); or
- Any third party (including our affiliates and licensees), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time, and you may consult this page to review any changes. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Third Parties

We may include on our Website links to third-party websites, including those maintained by Company licensees, and we may display User Contributions provided by third parties. We assume no responsibility for the content, accuracy or reliability of such third-party websites, nor any User Contributions. If you experience any problem related to a website controlled and maintained by a Company licensee, please contact us at once at webmaster@mollymanners.com.

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect Personal Data (defined below) from children under 13. If we learn we have collected or received Personal Data from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any inadvertently collected information from or about a child under 13, please contact us at webmaster@mollymanners.com.

Types of Information we Collect

We collect several types of information from and about users of our Website, including information relating to identified or identifiable individuals (“Personal Data”). The Personal Data we collect generally falls into three categories:

- *Identification Data* – Personal Data by which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline.
- *Biographical Information* – Personal Data about your background, education, employment, or similar matters that is associated with your Personal Data..
- *Device Information* – Personal Data relating to your device or internet connection, such as your IP address, operating system, browser, etc. you use when accessing our Website.

How We Collect and Use Personal Data

We generally collect Personal Data when you provide it to us, and automatically as you navigate through the Website. Note, we may receive your Personal Data from third parties acting on our behalf, for example, our referral partners and licensees.

Information You Provide

We generally collect Identification Information and Biographical Information when you provide information for use in connection with our products and services. For example, we may collect:

- Any Personal Data that you provide via forms or applications on our Website (including Personal Data provided via third parties acting on our behalf). This

information includes Personal Data provided in connection with registering to use our Website, submitting a licensee application to Company, subscribing to our blog or newsletter, posting or downloading licensee materials, or requesting other services from us.

- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Records and copies of your correspondence (including email addresses), if you contact us for any reason, including any additional Personal Data you may provide in those communications.

Note, we may offer features on our Website where you also may provide Personal Data that may be published or displayed (hereinafter, “posted”) on public or password protected areas of the Website, or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no website is perfectly secure. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may collect certain Device Data, such as details of your visits to our Website, including information about how you arrived at the Website, your approximate location, the time you spent on the site, the device you use, and other similar information about how you access, use, and navigate the Website.

The information is typically processed in aggregate form, but we may maintain it or associate it with certain Personal Data. We generally process this information to help us to improve our Website and to deliver a better and more personalized service, for example, by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize your device when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or HTTP cookies or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

Please note, certain technologies in use on the Website may be served by third-party service providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website and share this information with us. The information they collect may be associated with certain Personal Data or they may collect information, including Personal Data, about your online activities over time and across different Websites and other online services.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Data:

- To present our Website and its contents to you and to understand how our Website is used, and to make improvements to our Website based on that usage;
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account and status as a licensee, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website for licensees.

- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Disclosure of Your Information

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may also disclose Personal Data that we collect or you provide to the following parties:

- To our subsidiaries and affiliates, if any, as part of the facilitation, management, and improvement of our operations, or for recordkeeping or other administrative reasons.
- To service providers and other third parties that process information on our behalf, and which we use to support our business, provide value-added features (such as hosting and payment processing) and other similar matters.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Molly Manners, LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Molly Manners, LLC is among the assets transferred.
- As necessary to fulfill the purpose for which you provide it, or in order to carry out any transaction you request.
- For any other purpose disclosed by us when you provide the information.
- In accordance with your consent.

We may also disclose your Personal Data:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use [<http://mollymanners.com/investment/WebsiteTermsUse.pdf>] and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property or safety of Molly Manners, LLC, our customers or others. This includes exchanging

information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. Please note, if you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. You may also opt-out of data collection directly with third party vendors we may use to assist us in performing these tracking services. For a list of third parties, please contact us, as these parties may vary.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own products or services, you can opt-out by sending us an email stating your request to webmaster@mollymanners.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, product service experience or other transactions. Please note, Molly Manners is a licensor of learning materials. You may receive emails from individual licensees regarding lessons branded by Molly Manners. To opt out of emails from licensees, please contact the licensee directly.
- **Other Matters.** You may object to our use and transfer of information where the law grants you the right to do so, and upon our review of your objections, we may restrict processing if the law requires us to do so. However, we may not limit processing where the restriction violates the rights of any third party, or where we a legitimate business interest in continuing such processing.

Your Privacy Rights

Subject to the rights granted to other individuals, and our rights to limit or deny access/disclosure under applicable law, you have the following rights in your Personal Data. Note, we may require that you provide additional Personal Data to exercise these rights, e.g. information necessary to prove your identity. You may exercise your rights by emailing us at webmaster@mollymanners.com.

Access: You may receive a list of your Personal Data that we process to the extent required and permitted by law.

Rectification: You may correct any Personal Data that we hold about you to the extent required and permitted by law.

Erasure: To the extent required by applicable law, you may request that we delete your Personal Data from our systems.

Data export: To the extent required by applicable law, we will send you a copy of your Personal Data in a common portable format of our choice.

Direct marketing: Residents of California may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year (if any). This request must be written, signed, and mailed to us at the address below.

Regulator Contact: You have the right to contact or file a complaint with regulators about our processing of Personal Data. In the U.S., you can contact the Federal Trade Commission. In the EU and elsewhere, please contact your local data protection or consumer protection authority.

Please note, if you are a licensee of Company, we may not be able to delete your Personal Data except by also terminating your license agreement. We may not accommodate your request to change or delete any information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our Terms of Use [<http://mollymanners.com/investment/WebsiteTermsUse.pdf>].

Information Security

We use reasonable security measures to protect your personal information. We implement and review various physical, procedural and technological safeguards that we believe will keep your personal information secure.

Data Retention

We retain information for so long as it, in our discretion, remains relevant to its purpose, and in any event, for so long as is required by law. We will review retention periods periodically, and may pseudonymize or anonymize data held for longer periods, if appropriate.

International Users

If you are accessing our Service from outside of the United States, any information provided will be transferred to us or our service providers in the United States. Regardless of where your information is collected or transferred, the information will be treated in accordance with this Policy. You consent to such transfer through your use of the Service.

Notice for California Users.

Under California Civil Code Section 1789.3, California users are entitled to the following specific consumer rights notice: The Complaint Assistance Unit of the Division of Consumer Service of the

California Department of Consumer Affairs may be contacted in writing at 1625 North Market Blvd., Sacramento, CA 95834, or by telephone at (916) 445-1254 or (800) 952-5210.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. We may notify you of such changes if we believe notice is required. The date the privacy policy was last revised is identified at the top of the page.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: webmaster@mollymanners.com.