PRIVACY AND ONLINE DATA COLLECTION NOTICE

Effective January 1, 2019

This Privacy and Online Data Collection Notice is provided for all Fabric-based online learning management systems (collectively and generally referred to herein as "Fabric") created by Cogcentric Labs Inc. ("Cogcentric").

1.   OUR COMMITMENT TO PRIVACY

Your privacy, as a user of our software, is important to Cogcentric ("we"). To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and at every point where personally identifiable information may be requested.

2.   THE INFORMATION WE COLLECT

This notice applies to all information collected by or submitted to Fabric. On some sites, you can purchase access to online media, including but not limited to educational courses, video webinars, and electronic publications. Others sell access to events like conferences, classes, or webinars. The types of personal information collected for financial transactions are:

- Your contact information, including your name, mailing address, and phone number.
- Your email address.
- Your credit/debit card information.
- Information regarding how you use Fabric.

3.   THE WAY WE USE INFORMATION

Your contact information. We only use the information you provide about yourself when you purchase access to online media to complete that order. We do not share this information with outside parties except to the extent necessary to complete that order.

Your email address. We use your return email addresses to answer the email we receive from you and to send you updates on our media offerings and services, where requested. Your email address will not be used for any other purpose and will never be shared with outside parties.

Your credit/debit card information. We do not directly handle or store your credit/debit card information when you purchase access to online media or events to complete that order. Credit card information is collected by the payment gateway directly, so that the only information we

need to store is confirmation that a transaction went through. This information is also never shared with anyone, except where needed to complete a transaction.

Information regarding how you use Fabric. We use non-identifying and aggregate information to better-design Fabric and to provide features to you. Such information will not be used for any other purpose and will never be shared with outside parties. For instance:

- Information regarding your answers to assessments, polls, surveys and forms is used to keep track of a person's achievements, for personalization, and being able to display results and rankings.
- Information regarding your profile data. This can include preferences, personality traits, goals, availability, special skills, special needs, and other metadata that help coaches, teachers, or therapists meet those needs in a way that suits them and will be most effective. Profile data is also used in matching algorithms to help members find communities of people facing the same issues, having the same needs, shared interests, finding friends or collaborators, being matched with a mentor or partner to help them achieve their goals.
- Information regarding your completion data. In order to allow people to always keep building on previous achievements and continue from where they left off, we keep track of which courses and objects each member has completed and not completed. Completion data also drives notifications - that a member has achieved a goal their coach set for them, or that a coach has assigned a new goal or scheduled a meeting.
- Information regarding your attendance. For live classes, conferences, webinars and other events, we keep track of what a person has attended.
- Information regarding your achievements. We keep track of certificates, degrees, medals, trophies and other achievements.
- Information regarding your purchase history. We need to keep track of what each member has and has not purchased in order to make sure they can access what they have purchased, and to be able to apply appropriate discounts based on that purchase history. (Credit card data could be included here)
- Information regarding your group membership. We keep track of a member's role, which journeys they are on, their membership level and subscription plan using groups. This personalizes the experience for them.
- Information regarding your access level. We keep track of which views in the interface a member can see, and what functions they can perform, such as being registered on the site, being an author, coach, or administrator.
- Information regarding your messages. Any member can privately message any other member or groups of members in private chats that can be live or asynchronous. We store these chat logs for every user so that they can participate in conversations.
- Information regarding your comments, questions and answers. People can comment on (or ask questions connected to) any element on any page, and they can answer questions or participate in threaded discussions around a topic - so we store all of that data.

- Information regarding your following data. A member can follow people or resources. If they are following a coach, they'll get notified when the coach posts a new resource. If they ask a question, they get notified when that question gets answered. If they are following an article, they get notified when a new version is published. We track following in order to keep a member informed on things that matter to them.
- Information regarding your feedback and grading data. For coaches/teachers/mentors on the site, they are able to grade assignments and/or give feedback to their students/clients in the form of text comments, new assignments, scheduled tasks or updates to their assigned content. We keep track of what each coach has assigned, assessed and given feedback on.

Finally, we never use or share the personally-identifiable information provided to Cogcentric online in ways unrelated to the ones described above without also providing you an opportunity to opt-out or otherwise prohibit such unrelated uses beforehand.

4. OUR COMMITMENT TO DATA SECURITY

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

5. HOW YOU CAN ACCESS OR CORRECT YOUR INFORMATION

Most of the personally-identifiable information that we collect online and maintain can be accessed and modified by logging into your account. If you have trouble logging into your account, changing your personally-identifiable information, or if you have any concerns regarding your personally-identifiable information, please contact support@cogcentric.com

6. HOW TO CONTACT COGCENTRIC

Should you have other questions or concerns about these privacy policies, please send Cogcentric an e-mail at contact@cogcentric.com