# GREAT LAKES EDUCATIONAL GROUP

# PRIVACY STATEMENT

Great Lakes Educational Group, LLC (as used in this Privacy Statement, "GLEG", "us" or "we") respects and shares your concern about your privacy and the privacy of your children. We are committed to protecting your Personal Information. You have a right to know what information we collect and how we may use it. The following Privacy Statement describes the information we collect and how we use this information. By using our website and/or by enrolling your child at GLEG, you consent to the practices described in this herein.

# What Type of Information Do We Collect?

Most of the personal information we receive has been provided to us by you, typically when you visit our website or enroll your child at GLEG.

### **Enrollment and Study at GLEG**

When you enroll your child at GLEG, the Director of Programming will have you fill out and sign an enrollment form, asking for your name, address, telephone number, e-mail address and other information necessary to serve your child's education needs. Similar information will be collected regarding your child. This information is subsequently transmitted to us.

During your child's enrollment at GLEG, we will collect information about your child's study progress from our Instructor. This information helps us support your Instructor with the operation of GLEG, will serve to develop and improve our instructional methods and learning materials.

#### Greatlakeseducationalgroup.com

If you request information through our website, you will be prompted to provide your name, email address, physical address and telephone number. We collect and store this information to allow us to communicate with you and send you the information you have requested. We also may use this information to periodically send you, by email or text, various marketing information.

GLEG also collects from visitors to our website non-personally identifying information of the sort that web browsers and servers typically make available, such as browser type, language preference, date and time of each visitor request. We cannot use this information to identify, distinguish or trace you or your device, even if combined with other identifying formations. This data is used in an anonymous way, sometimes aggregated with other

anonymous data about other users, for us to analyze the experience of visiting the GLEG website.

### Cookies

A cookie is a string of information that a website stores on a visitor's computer that the visitor's browser provides to the website each time a visitor returns. GLEG uses cookies to identify and track return visitors and their use of our website. Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using GLEG's website. By continuing to navigate our website without changing your cookie setting, you are acknowledging and agreeing to GLEG's use of cookies.

GLEG does not request Personal Information via e-mail or telemarketing. If someone contacts you in either of these manners and requests Personal Information on behalf of GLEG, do not respond. Delete, disregard or hang up. These requests are not from us.

How We Use Personal Information.

GLEG does not request Personal Information via e-mail or telemarketing. If someone contacts you in either of these manners and requests Personal Information on behalf of GLEG, do not respond. Delete, disregard or hang up. These requests are not from us.

- Fulfillment of the contractual obligation of GLEG and its Instructors to provide educational enrichment to your child after enrollment at GLEG;
- Our legitimate business interests;
- Compliance with a legal obligation, court order or to exercise or defend a legal claim;
- Development and improvement of GLEG instructional methods in the U.S
- Development and improvement of GLEG learning materials in the U.S:
- To offer training of our employees in the U.S.;
- To use in software to schedule and communicate tutoring sessions;
- Verification of your identity when you return to our website;
- To communicate with you via email, postal mail, phone and other means;
- Protection against identify theft and prevention fraud or other unlawful activity;
- Compliance with and enforcement of relevant standards, contractual obligations and our policies;
- Response to your inquiries.

#### Information We Share.

GLEG has never and will never rent or sell Personal Information to anyone.

GLEG may disclose Personal Information to its employees or contractors: (i) have a need to know that information in order for GLEG to provide and improve educational enrichment service to your child or for the purposes listed in "How We Use Personal Information"; and (ii) have agreed not to disclose any Personal Information to others. By enrolling your child at GLEG or by the use of our website, you consent to the transfer of Personal Information.

Other than as described in this paragraph, GLEG will only disclose actual or potentially personally identifying information to third parties in response to a subpoena, court order or other valid governmental request.

### Transfer of Your Data Among Jurisdictions.

We are a U.S.-based company. We reserve the right to process, transfer or maintain your Personal Information on servers or databases located within the U.S. and elsewhere. We reserve the right to transfer your Personal Information to and from any state, province, country or other governmental jurisdiction. Your use of our website or enrollment of your child at GLEG represents your agreement to any such transfer.

### How We Protect Personal Information.

We maintain administrative, technical and physical safeguards designed to protect the Personal Information you provide to us against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, while we exercise what we believe to be appropriate standards and safeguards, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee its absolute security and will not be responsible for any accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use of any Personal Information you have given to us.

### Accessing and Updating Your information.

At the time of enrollment, you will only provide your necessary Personal Information to begin tutoring with a GLEG Instructor. You can update or edit Personal Information you have entered on your child's enrollment form by contacting your child's Instructor or Director of Programming at GLEG.

# Children's Privacy Protection.

We understand the importance of protecting children's privacy in the interactive online world. We never intentionally collect or maintain any Personal Information about anyone under the age of 13, other than as needed to enroll children at GLEG, to obtain appropriate information to plan and assess your child's study at GLEG or to process information regarding enrollment, as described in this Privacy Statement.

# Opt-Out Right.

From time-to-time we may send you by means of e-mail, postal mail, or text message, commercial messages we believe may be of interest to you, such as marketing campaigns. If you do not wish to receive marketing or other commercial messages from us, simply follow the unsubscribe instructions contained in the message you receive from us.

### Right of Access/Right of Deletion.

You have the right to receive, in a structured, commonly used and machine readable format, the Personal Information you have provided to us or to the GLEG Instructor, about you or your child. You have the right to have the information transmitted to another company, where it is technically feasible.

With certain exceptions, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your Personal Information and we will apply your preference going forward. This will not affect the lawfulness of our use of your information based on your consent before it was withdrawn.

To exercise your rights, please contact us in the manner indicated in the "How To Contact Us" section of this Privacy Statement.

### How To Contact Us.

If you have any questions about GLEG's privacy practices or to exercise any of your rights of access or deletion, contact us in either of the following manners:

734 944-5658

or

lgilbert@greatlakeseducationalgroup.com