

Privacy Policy (Revised 9/12/21)

IgnitEDU and Broderick & Co. (hereinafter collectively “IgnitEDU”) is committed to the protection of your personal information. This Privacy Policy sets out the basis on which IgnitEDU collects and uses personal information about you as part of our business activities.

This Privacy Policy describes in detail who is responsible for the personal information that IgnitEDU collects about you, what personal information is collected, how IgnitEDU uses such personal information, who IgnitEDU may disclose it to and your rights and choices in relation to your personal information.

This Privacy Policy generally covers information collected via www.ignitEDU.net and any other subdomain, website or webpage that IgnitEDU may have in place now or in the future (collectively, the “IgnitEDU Website”), but also relates to information collected by IgnitEDU outside of the IgnitEDU Website including through the provision of services, online training, etc.

Who is Responsible for the Personal Information That IgnitEDU Collects?

For the purposes of all relevant data protection laws, IgnitEDU is the data controller as to the personal information that is collected and used as part of its business activities. This is because IgnitEDU dictates the purpose for which your personal information is used and how IgnitEDU uses your personal information.

What Personal Information Does IgnitEDU Collect?

While some of the information collected is required for business engagement purposes, other information is voluntarily given by you. The type of personal information that IgnitEDU may collect could include, but not limited to, the following:

- Your full name, e-mail address, phone number and email contact information;
- Your job title and the organization for which you work;
- Preference information, such as the communications you receive from us;
- Information you provide to us for the purposes of attending meetings, events, training, webinars and other programs; and
- Any other information relating to you (or other individuals) which you may provide to us.

If you are providing personal information to IgnitEDU relating to a third party, you confirm that you have the consent of the third party to share such personal information with IgnitEDU and that you have made the information in this Privacy Policy available to the third party.

Sensitive Categories of Information

Some jurisdictions consider certain personal information particularly sensitive. IgnitEDU collects this data for statistical and reporting purposes only. This information may be required in order to create an account on our platforms, as some grantors require that we track the age of our participants. IgnitEDU does not share this information with third parties for business purposes; IgnitEDU only shares this information with grantors when required as a term of the grant. Such information may include the following:

- Date of birth
- *Aggregate and/or deidentified demographic information such as race, ethnicity, income and the like.*

Website Usage Information

IgnitEDU collects information when you provide it to IgnitEDU, such as when you use the “contact us” feature on the IgnitEDU Website, register for access to services or otherwise communicate with IgnitEDU (such as by email or via IgnitEDU social media pages).

IgnitEDU collects certain information automatically when you use the IgnitEDU Website, such as your IP address and domain name, browser type, history of pages viewed and other usage information about your use of the IgnitEDU Website. IgnitEDU collects this information for site administration purposes, such as to analyze this data for trends and statistics. IgnitEDU may share statistical or aggregated non-personal information about its users with advertisers, business partners, sponsors and other third parties. This data is used to customize the IgnitEDU Website content and advertising to deliver a better experience to our users. Please see the section below on cookies for more information.

How Does IgnitEDU Obtain Your Personal Information?

As noted above, we collect information from you in the course of your use of the IgnitEDU Website. For example, IgnitEDU collects information from you when you contact or communicate with IgnitEDU (including through the IgnitEDU Website, by email or otherwise) or when you register for access to services through IgnitEDU’s website.

IgnitEDU also collects your personal information while monitoring the IgnitEDU Website. IgnitEDU also gathers information about you when you provide it to us or interact with us directly.

How Does IgnitEDU Use The Personal Information It Collects?

IgnitEDU collects personal information for the following principal purposes; for each purpose, IgnitEDU has also set out below the legal basis under relevant data protection laws that we rely on to justify this use of your personal information.

Purpose	Legal Bases
● To provide the IgnitEDU Website and services through the website to you	● For our legitimate business purposes (i.e., the provision of the IgnitEDU Website) and, depending on the circumstances, to perform a contract between you and IgnitEDU.
● To communicate with you and to respond to questions that you have raised with IgnitEDU;	● For our legitimate business purposes (i.e., the provision of the IgnitEDU Website).
● To administer and improve the IgnitEDU Website;	● For our legitimate business purposes (i.e., the provision of the IgnitEDU Website, as well as to improve and ensure the security of the IgnitEDU Website). IgnitEDU may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law (e.g., in relation to our use of certain cookies).
● To process your payment for IgnitEDU services, products and events;	● For our legitimate business purposes (i.e., the provision of the IgnitEDU Website).

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- To send you, or for our third-party partners to send you, information about products, services and events that may be of interest to you based on your preferences;
 - For our legitimate business purposes (i.e., the provision of the IgnitEDU Website). IgnitEDU may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law.
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- To administer surveys;
 - For our legitimate business purposes (i.e., the provision of the IgnitEDU Website). IgnitEDU may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law.
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- To prevent and detect fraud; and
 - For our legitimate business purposes and for compliance with legal obligations to which we are subject
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- To protect and enforce IgnitEDU's legal rights.
 - For our legitimate business purposes and for compliance with legal obligations to which we are subject

With Whom Does IgnitEDU Share Your Personal Information?

IgnitEDU reserves the right to disclose and/or transfer personal information to a third party, if IgnitEDU has reason to believe that disclosing personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) IgnitEDU rights or property, other IgnitEDU Website users or anyone else who could be harmed by such activities. Additionally, IgnitEDU may disclose personal information in response to a subpoena, warrant or other court order, or when IgnitEDU believes in good faith that a law, regulation, subpoena, warrant or other court order requires it.

IgnitEDU reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of IgnitEDU.

IgnitEDU may share your information with personal advisors, such as accountants, lawyers, and grantors, who assist us in carrying out our business activities.

IgnitEDU may share your information, including details about your engagement with a product (course completion percentage, level of participation, etc.) with your employer or other organization with which you are associated.

IgnitEDU may share personal information with third parties engaged to assist IgnitEDU in providing services to you or to carry out one or more of the purposes described above. These service providers are prohibited from using your personal information for any purpose other than to provide this assistance and are contractually required to protect personal information disclosed by IgnitEDU and to comply with the general privacy principles described in this Privacy Policy.

If you choose not to provide IgnitEDU with your personal information, you may still visit the IgnitEDU Website. However, you may be unable to access certain website options, such as use the IgnitEDU Website functionality to its fullest extent.

Your Rights, Including Removing, Correcting or Updating Personal Information

If you change your mind on how IgnitEDU discloses or uses your information, or wish to access, correct or update personal information (such as your address), it will endeavor to correct, update or remove the personal data you give us.

THE BELOW TABLE APPLIES TO INDIVIDUALS LOCATED IN THE EU AND EEA ONLY:

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights and who to contact to exercise them.

	Summary of your rights	Who to contact
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.	IgnitEDU at hello@ignitedu.net

IgnitEDU may require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require);

Right to rectify your personal information

You have the right to ask IgnitEDU to correct your personal information that it holds where it is incorrect or incomplete.

IgnitEDU at
hello@ignitedu.net

Right to erasure of your personal information

You have the right to ask that IgnitEDU delete your personal information in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which IgnitEDU relies on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if IgnitEDU has used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.

IgnitEDU at
hello@ignitedu.net

Right to restrict the use of your personal information

You have the right to suspend IgnitEDU's use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable IgnitEDU to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) IgnitEDU no

You may effectuate this right at any time by contacting IgnitEDU at
hello@ignitedu.net

longer needs your personal information, but your personal information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your personal information and IgnitEDU is verifying whether its grounds for the use of your personal information override your objection.

Right to data portability

You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organization, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.

You may effectuate this right at any time by contacting IgnitEDU at hello@ignitedu.net

Right to object to the use of your personal information

You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and IgnitEDU uses your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.

You may effectuate this right at any time by contacting IgnitEDU at hello@ignitedu.net

Right to withdraw consent

You have the right to withdraw your consent at any time where IgnitEDU relies on your consent to use your personal information.

You may effectuate this right at any time by contacting IgnitEDU at hello@ignitedu.net

**Right to
complain to
the relevant
data
protection
authority**

You have the right to complain to the relevant data protection authority where you think IgnitEDU has not used your personal information in accordance with data protection law.

Find your National Data Protection Authority online

How Long Will IgnitEDU Keep Your Personal Information?

IgnitEDU keeps your personal information for the period of time that you are a user of the IgnitEDU Website and for five (5) years after you discontinue use of the IgnitEDU Website.

Links to Other Websites

The IgnitEDU Website may contain links to other websites not controlled or legally affiliated with IgnitEDU. These sites are not controlled by IgnitEDU and IgnitEDU is not responsible for any content contained on any such website. IgnitEDU is not responsible for the privacy practices employed by other sites, and the privacy practices employed by such sites may not be the same as IgnitEDU's privacy practices. As with the IgnitEDU Website, you should become familiar with any external party's privacy policy before visiting and/or providing any personal information through any such site.

IgnitEDU may terminate access for any party who is found to repeatedly provide or post protected material without necessary rights and permissions.

Cookies

IgnitEDU uses cookies to manage its website. A cookie is a small file placed on your computer when you visit a website. Cookies are used to store information to manage your website experience such as your type of web browser. A cookie can also store preference information to customize your website experience.

Cookies help us understand how parties use our website so IgnitEDU can design better services in the future. You can adjust your web browser to disable cookies. However, IgnitEDU may not be able to provide you with all the services or functionality available on the IgnitEDU Website if you choose to disable cookies.

You may also remove IgnitEDU cookies from your browser. Please refer to your browser's help menu for instructions.

Contacting IgnitEDU with Questions, Concerns or Complaints

Should you have any questions, concerns or a complaint about this Privacy Policy, please contact IgnitEDU at hello@ignitedu.net. You are entitled to make an anonymous complaint or inquiry in relation to this Privacy Policy or your privacy rights; however, IgnitEDU may require you to identify yourself if required by law or it is impracticable for us to deal with your matter otherwise.

IgnitEDU Website and Communications Terms of Use

Please refer to IgnitEDU's Terms of Use and/or Terms and Conditions on all issues related to accessing, posting and sharing information through the IgnitEDU Website and communication services.

Changes to The IgnitEDU Privacy Policy

Any material changes to the Privacy Policy will be posted on this page. The updated Privacy Policy will take effect as soon as it has been posted.