

VirBELA Privacy Policy

Effective as of March 21, 2019

1. Introduction, Age Requirements and Parental Consent.

eXp World Technologies, LLC d/b/a VirBELA ("VirBELA") is the provider of the VirBELA virtual campus services ("Services") and the owner of the website at <www.virbela.com> ("Our Site"). VirBELA can be contacted by mail at 2219 Rimland Dr. Suite, 301, Bellingham, WA 98226 or by email at info@virbela.com. This privacy notice discloses VirBELA information practices for the Services and Our Site. At times, VirBELA will need Personal Information regarding a customer or a prospect. For example, to process an order or provide a subscription for the Services, VirBELA may need to know a customer's name, mailing address, email address and/or credit card details. It is VirBELA's intent to inform you before VirBELA collects personal information, such as user's name and/or address on the Internet. If you tell us that you do not wish to have this information used as a basis for further contact with you, VirBELA will respect your wishes.

To the extent any children use our Services, we strive to educate parents and children about how to appropriately safeguard their privacy when using our Services. We are committed to complying with the Children's Online Privacy Protection Act of 1998 ("COPPA"), which requires us to inform parents and legal guardians about our information collection and use practices. COPPA also requires that we obtain parental consent before we allow children under the age of 13 to access and/or use our Services or Our Site. We urge children to check with their parents before entering information through Our Site and/or Services, and we recommend that parents discuss with their children restrictions regarding the online release of Personal Information (as defined herein, including above) to anyone they do not know.

By visiting Our Site and/or using Services, or by permitting your child to use Our Site and/or Services, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

If you are using these Services or Our Site without providing verifiable parental consent, then you must be at least eighteen (18) years of age or older, or otherwise of legal age in your jurisdiction ("Minimum Age"), not under age 13, and competent to agree to these Terms.

2. Personal Information That May Be Collected.

- (a) **Your privacy is important to us.** We will not sell any personal information you provide us to any third party. We take reasonable precautions to keep all personal data we have stored safe from disclosure or theft by others. With permission from you, we may send updates about VirBELA, and our services and developments, which may include newsletters. You can exercise your right to receive, or to prevent, these communications by checking certain boxes on the forms we use to collect your data. Our email communications will provide you with the ability to opt out of receiving future such communications. We may collect information, including IP address, operating system and browser type, for system administration and to understand aggregate

information to improve our services. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

In order to access certain subscriber services and/or restricted areas within the VirBELA Services or Our Site, VirBELA will request a user to provide certain personal identifying information. VirBELA may request additional information necessary to establish and maintain a customer's account. We may collect and process the following data:

- Information that you provide by filling in forms for our Services or an account established using Our Site. This includes information provided at the time of registering to use our Services or Our Site, which may include: name, postal address, email address, screen name, password, telephone number, and facsimile number.
- We may also ask you for information when you report a problem with our Services.
- If you contact us, we may keep a record of that correspondence.
- If you agree to complete surveys, we may store and use that data for research purposes.
- Details of visits or logins to our Services including, but not limited to, traffic data, location data and other communication data, and the resources accessed.
- Financial information, such as method of payment, bank account, and credit/debit card numbers, if applicable.
- We use third-party cookies provided by Google Analytics to gather anonymous information for the benefit of all web users.
- Other information specific to you which you voluntarily provide to us.

(b) User Accounts. VirBELA allows users to set up accounts to participate in our Services and online communities. You have the ability to edit your user Information at any time, and may delete your account at your convenience. Under no condition will VirBELA share your user account information with another individual, business or government entity, who are not otherwise required to render our Services to you, unless VirBELA is required to respond to court orders, subpoenas or other legal process. However, to the extent your account is established by your Organization (e.g., an employer), or your subscription to an aspect of the Services is provided by your Organization, your Organization may have access to your account information associated with such account and/or information regarding your use of the aspect of Services accessed under your Organization's subscription (including, for example, content and/or information you share through the Services, and other information regarding your activities while accessing such aspect of the Services under your Organization's subscription).

3. Uses Made of the Information.

(a) Limited Uses Identified. Personal information collected by VirBELA will be used by VirBELA for the following purposes:

- To ensure that content from Our Site is presented in the most effective manner.
- To provide you with information or services that you request from us, or which we feel may interest you, where you have consented to be contacted for such purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- For statistical analysis of customer's behavior and product development.
- To notify you about changes, updates and upgrades to our service.
- For internal company review.
- We use return email addresses to answer the email we receive. Such addresses are not used for any other purpose and are not shared with outside parties.

You are not required to provide any of this information, but if you choose not to provide certain information, we may not be able to provide the requested service or complete your transaction.

- (b) Stored Information Uses.** VirBELA may store and retain certain information provided by users, for use by VirBELA and VirBELA agents: to support customer interaction with the VirBELA Services and Our Site; to deliver users purchases; and/or to contact users about VirBELA services and products.

The data that we collect from you may be transferred to, and stored at, a destination outside the United States. It may also be processed by staff operating outside the United States. By submitting your personal data, you agree to this transfer, storing or processing. We will take reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

4. Disclosure of the Information.

- (a) Corporate Organization and Assignment.** VirBELA works in connection with related companies to provide its Services to you, and may share your personal information with its parent, subsidiary or sister companies, as well as its licensees, and may transfer the information to other countries in the world where VirBELA conducts business. Some countries may provide less legal protection for customer personal information. In such countries VirBELA will still handle customer personal information in the manner described herein. Circumstances may arise where for business reasons, VirBELA decides to sell its business, buy another, merge or otherwise reorganize its businesses in the United States or some other country. Such a transaction may involve the sharing of personal identifying information to prospective or actual purchasers or target companies and it is VirBELA's practice to seek appropriate protection for information in these types of transactions.
- (b) Agents.** VirBELA employs or engages other companies and individuals to perform business functions on behalf of VirBELA. These persons are provided with personal identifying information required to perform their functions, such as, for example, processing credit card payments and providing customer services.

- (c) **Disclosure to Governmental Authorities.** VirBELA may release personal information to appropriate governmental authorities where release is required by law (for example, a subpoena) or by a regulation, or is requested by a government agency conducting investigations or proceedings.

5. Use of Computer Tracking Technologies.

We may use cookies (e.g., pieces of code or text placed on your computer by us or third-parties when you browse Our Site) to your web browser (if your browser's preferences allow it) to collect data when you browse Our Sites. Cookie settings can be controlled in your Internet browser to automatically reject some forms of cookies. If you view Our Site without changing your cookie settings, you are indicating your consent to receive all cookies from Our Site. If you do not allow cookies, some features and functionality of Our Site may not operate as expected. In addition to cookies, we may place technological tools (and allow certain third parties to place technological tools) such as tags and beacons (e.g., code scripts that are primarily used to track visitors' activities on Our Site by web analytics software), Internet Protocol (IP) addresses, and other tools, to collect your data for the purposes listed in this Privacy Policy.

6. Information Security.

- (a) **Commitment to Online Security.** VirBELA intends to protect customer personal information and to maintain its quality. To achieve information security and quality, VirBELA implements appropriate measures and processes, such as using encryption when transmitting certain sensitive information.
- (b) **Encryption.** All user account pages are protected with Secure Socket Layer ("SSL") encryption. All user accounts must be accessed with usernames and passwords. You are advised not to share your username and password with any other person.
- (c) **No Liability for Acts of Third Parties.** VirBELA will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, VirBELA shall not be liable for unauthorized disclosure of personal information due to no fault of VirBELA including, but not limited to, errors in transmission and unauthorized acts of VirBELA staff and third parties.

7. Privacy Policy Changes and Opt-Out Rights.

- (a) **Changes to Privacy Policy.** This privacy notice was last updated on March 12, 2019. VirBELA reserves the right to change its privacy policy statement at any time. All changes to this Privacy Policy will be posted here. Please visit this page regularly to stay up to date. This policy was last amended on March 12, 2019.

Opt-Out Right. In order to provide the Services, we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services. You have the right at any time to cease permitting personal information to be collected, used or shared/disclosed by VirBELA and/or by any third parties with whom VirBELA has shared and/or transferred such personal information, but it may require that we discontinue providing the Services to you. You may make your privacy choice(s) at any time. However, if we do not hear from you, we

may share, and continue to share, some of your information with affiliated companies and other companies with whom we have contracts to provide products and services. Right of cancellation may be exercised by contacting VirBELA via email at info@virbela.com.

We strive to help parents ensure that their children have a safe experience using Our Site and/or Services. Parents or legal guardians can review any Personal Information collected about their child under 13 years of age, have this information deleted, request that there be no further collection or use of their child's Personal Information, and/or allow for our collection and use of their child's Personal Information while withholding consent for us to disclose it to third parties. We take steps to verify the identity of anyone requesting information about a child and to ensure that the person is in fact the child's parent or legal guardian.

8. Access Rights to Data. Upon a user's request, VirBELA will provide a reasonable description of customer's personally identifiable information that VirBELA maintains in its data bank. VirBELA can be contacted by email at info@virbela.com or certified postal mail at 2219 Rimland Dr. Suite, 301, Bellingham, WA 98226.

9. Accountability.

(a) Questions, Problems and Complaints. If you have a question about this policy statement, or a complaint about VirBELA compliance with this privacy policy, you may contact VirBELA by email at info@virbela.com.

(b) Terms of Use. If you choose to subscribe to the Services or to use an account established at Our Site, your action is hereby deemed acceptance of VirBELA practices described in this policy statement. Any dispute over privacy between customer and VirBELA is subject to the provisions of this notice and to VirBELA's Terms of Use and End User License Agreement which is hereby incorporated herein and which can be read at https://assets.virbela.com/legal/VirBELA_TOU_EULA.pdf.

10. Your California Privacy Rights.

(a) Shine the Light Disclosures. Under California Civil Code Section 1798.83 ("Shine the Light" law), California residents who provide certain personally identifiable information in connection with obtaining products or services for personal, family, or household use are entitled to request and obtain from us (once a calendar year) information about the Personal Information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of Personal Information and the names and addresses of those businesses with which we may have shared Personal Information for the immediately prior calendar year (e.g., requests made in 2019 will receive information regarding 2018 sharing activities, if any).

We will respond to your request within thirty (30) days of receipt. Please be aware that not all information sharing is covered by the "Shine the Light" requirements, and only information on covered sharing will be included in our response

(b) California Consumer Privacy Act (CCPA) Disclosures. Pursuant to California Civil Code Section 1798.100 et al, California residents may also request from us, for the

preceding twelve (12) month period: (1) the categories of Personal Information and the specific pieces of Personal Information that we have collected about the resident, (2) the categories of sources from whom the Personal Information was collected, (3) our purposes for collecting the Personal Information, and (4) the categories of third parties with whom we have shared the Personal Information.

We will respond to verified requests within forty-five (45) days of receipt. Please note that we are only required to respond to each user twice per twelve (12) month period.

You can request that we delete your personal information. If no legal basis exists for us to keep your information, we will delete it within forty-five (45) days of receiving your verified request.

(c) California Resident Requests. If you are a California resident and you wish to make any of the above requests, please send an email message to info@virbela.com with "Request for California Privacy Information" in the subject line and in the body of your message. We will provide the requested information to you at your email address within the time period noted above. The information will be provided to you free of charge. We will not discriminate against you for exercising your rights under this section.

We cannot guarantee that the information will not be intercepted while being transmitted to and from us over the Internet. In particular, email sent to or from us may not be secure.

11. International Users.

Our Site and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to and stored in the United States, where the data protection laws may not be as comprehensive as those of your country of residence. If you are visiting us from outside the United States, please note that we may collect, transfer, and continue to use your Personal Information outside of your country of residence for any of the purposes described in this Privacy Notice. By using Our Site or the Services and providing us with your Personal Information, you consent to our collection, transfer, and continued use of your Personal Information in accordance with this Privacy Notice