

Privacy Policy

At Berlitz, we respect our customers and understand that you are concerned about privacy. Therefore, Berlitz Languages, Inc. and its affiliates (collectively, "Berlitz") have posted this Privacy Policy to let you know what kind of information we collect, how it is handled, and with whom it may be shared.

As we continue to develop our websites, including, without limitation, any website or URL of ours that we have linked to this Privacy Policy (collectively "websites"), and take advantage of technologies to improve the services we offer, this Policy will likely change. We encourage you to refer to this Policy on an ongoing basis, so that you understand our current Privacy Policy.

If you are a past or present employee of Berlitz who is based in the European Union or European Economic Area, please see the section below on "Information Received from the European Union or European Economic Area."

What Information Do We Collect?

1. Personal Information

We collect various types of "personal information" depending upon how you use our websites, such as:

- When you order from us, we collect your name, address, email address, phone number, and credit card number with expiration date.
- When you order from us, we may retain a record of your account and purchase information.
- When you enter a sweepstakes or contest online, we usually collect your name, address, email address, and phone number. We also may ask you for additional information, such as your age, interests, product preferences, or zip code.
- When you submit an inquiry, we need your name, email address and zip code to respond.

You will always know when we are collecting personal information because we only collect personal information when you voluntarily submit it to us. If you do choose to give us personal information through our websites, we will collect and retain that information, and you consent to the transfer and storage of that information on our servers. If you choose not to give us personal information, we may not be able to provide you with any services you may request or require.

b. **Non-Personal Information**

When you use our websites, we may also collect "non-personal information," which is information that, by itself, cannot be used to identify or contact you, such as demographic information (such as your age, gender, income, education, profession, zip code, etc.) or technical information (such as your IP address, the type of browser you are using). Non-personal information may also include information that you provide us through your use of our websites, such as the terms you enter into the search functions of our websites.

c. **Cookies and Similar Technologies**

When you visit or interact with our websites or services, we or our authorized service providers may use cookies, clear gifs, log files, flash cookies and similar technologies for the functioning of our services, to help us improve our performance, or to give you extra functionalities, all with the goal of providing a better experience.

The common types of tracking technologies (collectively "cookies and similar technologies") used by Berlitz include:

Cookies: A small piece of information sent by a website that is saved in the memory of your computer's browser or device. It holds information a site may need to interact with you and personalize your experience. At Berlitz, we use two kinds of cookies: session cookies and persistent cookies.

Session cookies exist only for as long as you stay on Berlitz' websites or your browser remains open. Once you exit your browser or leave Berlitz' websites, they go away. We use session cookies to maintain information we need to have in order for you to shop at our websites. For example, the

Session ID cookie that we ask your browser to hold retains the ID for your shopping bag. Without the Session ID cookie, you can't add merchandise to your bag and carry it to Checkout.

Persistent cookies last from visit to visit. They are stored in your browser's cache or device until you choose to delete them. We may use persistent cookies to give you a more personalized shopping experience and to help you navigate our site more efficiently.

Cookies can be used by a website to recognize you. But that does not necessarily mean any personal information is stored in the cookies. At Berlitz, we store no personal information about you in the cookies. Anything you choose to tell us about yourself (such as your address and email address) is stored on our secured servers. Please visit www.allaboutcookies.org for more information about cookies and how to disable them.

Web beacons: Small graphic images (also known as "pixel tags" or "clear GIFs") that may be included on our websites, services, applications, or tools, that typically work in conjunction with cookies to identify our users and user behavior.

Similar technologies: Technologies that store information in your browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods. These technologies can operate across all of your browsers, and in some instances may not be fully managed by your browser and may require management directly through your installed applications or device. We do not use these technologies for storing information to target advertising to you on or off our websites.

Use of Cookies and Similar Technologies by Authorized Third-Party Service Providers

We may work with third-party companies, commonly known as service providers, who are authorized to place cookies and similar technologies on our websites with our permission. These service providers help us to provide you with a better, faster, and safer experience.

These service providers may use cookies and similar technologies to help us deliver our own content and advertising, and compile anonymous site metrics and analytics. We do not authorize any of these service providers to

collect any of your personal information on our websites for their own purposes. Third-party cookies and similar technologies are covered by the third parties' privacy policies.

Do Not Track

Berlitz currently does not respond to Do Not Track signals in browsers. While we collect personal information from you as described earlier in this Privacy Policy, we do not collect personal information from you to monitor your online activities across third-party websites or online services (also known as behavioral advertising or interest-based advertising).

Third parties that have content embedded on Berlitz' websites (such as buttons, widgets, and other embedded features or content) may set cookies on a user's browser and/or obtain information about the fact that you visited our websites from a certain IP address. We do not authorize third parties to collect any other personal information from Berlitz' websites unless you provide it to them directly.

How Do We Use Your Information?

1. Personal Information

If you choose to provide personal information to us, we may use your information in a number of ways, including the following:

- To process orders or to respond to inquiries.
- To administer a sweepstakes or contest.
- To enhance your online experience. For example, we may use it to recognize you and welcome you to our websites.
- For marketing and promotional purposes. For example, we send out emails to our customers about products or events that we think may be of interest to them. We also may send you offers for discounts or free services.
- We may send you an email offer. We do this only if you have indicated previously that you are willing to receive email offers. Each time we send an email offer, we provide you with the opportunity to opt out of receiving future email offers.

Berlitz respects your privacy. We will not call you unless you have indicated telephone as your preferred contact method. In addition, your phone number will not be sold or given to any non-affiliated third party.

b. Non-Personal Information

We use the non-personal information we collect to analyze how our websites are being used, and to improve the content on our websites.

How Do We Share Your Information?

1. Affiliated Parties

Except as specifically set forth in this Policy, we do not share your personal information with any non-affiliated third party without your permission. We may disclose aggregate information, such as demographic information, and our statistical analyses to third parties, including advertisers or other business partners. This aggregate information does not include your personal information. We may, however, share your personal information with certain entities that control us, are controlled by us, or are under common control with us (our "Affiliates"), and websites operated by our Affiliates, so that they and we can offer you products and services that may be of interest to you. We require that our Affiliates agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures. As of November 4, 2016, these Affiliates include the following entities:

Berlitz Corporation
Berlitz Investment Corporation
Berlitz Publishing Company, Inc.
Berlitz Franchising Corporation
ELS Educational Services, Inc. (ELS)
World Wide Speaking SARL (World Speaking)
Second Language Testing, Inc. (SLTI)
Training Management Corporation (TMC)
Versation, Inc.

b. Service Providers and Third Parties

We may team with a marketing agency or another website to conduct a sweepstakes or other event. In this case, each of the participating third

parties may collect or receive personal information from you if you provide information directly to them. Therefore, you should refer to their privacy policies to understand how they handle your information and what kinds of choices you have.

Berlitz may also share your personal information with outside companies that perform services for Berlitz. For example, we may retain an outside company to manage a database containing certain customer information or to create and distribute an email offering. When we work with an outside party, we require that these parties agree to process your personal information based on our instructions and in compliance with this Policy. We will take appropriate steps designed to ensure your information will be used solely to provide the services requested by us, and not for other purposes.

c. **Other Disclosures**

Additionally, Berlitz may share your personal information when it is necessary to comply with law or to protect our interests or property. This may include sharing your personal information in response to subpoenas, court orders, or legal process, or in order to investigate or take action regarding illegal activities, suspected fraud, Terms of Use violations, or as otherwise required by law.

Is My Information Secure?

Berlitz is committed to doing its best to maintain the security of information collected on our websites. To try to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have implemented physical, electronic, and managerial procedures to safeguard and secure the information we collect.

There is always some risk in transmitting information electronically. As we deem appropriate, we use security measures consistent with industry standards. However, we cannot guarantee the security of our databases, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet.

Access and Corrections

You may contact us any time at rita.pauls@berlitz.de to: 1) see what personal information we have about you, if any, 2) change or correct any personal information we have about you, 3) have us delete any personal information we have about you, 4) express any concern you have about our use of your personal information. It is not technologically possible to change or delete each and every instance of the information we hold on you from our systems, and data may remain in non-erasable or aggregate form. We may retain data for a period in our backup or temporary systems. We may also retain some information for longer periods as required by law, contract, or auditing requirements.

What About Children's Privacy?

It currently is our policy not to knowingly collect personal information from any person under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with personal information without their consent, he or she should contact us at rita.pauls@berlitz.de. If we become aware that a child under 13 has provided us with personal information, we will endeavor to delete such information from our files as soon as possible.

If you are under 18 years of age and live in California, you have the right to request removal of content posted by you on our websites. Upon receipt of a fully completed removal request, we will use commercially reasonable efforts to remove content posted by you from our websites. Any such request does not ensure complete or comprehensive removal of your posted content. For example, your posted content may continue to appear on Berlitz' websites if it has been reposted by others or was independently posted by a third party, was posted by you anonymously, or if you were compensated for providing the content. Additionally, while Berlitz will remove the content you posted from our websites, it may continue to be stored on our servers (although it will not be visible to other users of our websites). You must complete the removal request form accurately and in its entirety in order for the request to be processed.

How to Provide a California Minor Removal Request

If you are a user under the age of 18 and reside in California, and you wish for your published content to be removed from Berlitz' websites, please provide Berlitz' Agent listed below with the following information in a

written notice:

- (1.) Confirmation that you are currently a legal resident of the state of California;
- (2.) Confirmation that you are under the age of 18 by providing your birthday;
- (3.) Describe the exact content that you are seeking to have removed (please provide a URL if possible);
- (4.) Provide your full name; and
- (5.) Provide your email address.

Berlitz' designated Agent for California Minor Removal Requests can be reached as follows:

Service Provider: Berlitz Languages, Inc.

Name of Agent of Request: Rita Pauls

By mail: 7 Roszel Road, Princeton, NJ 08540

By fax: (609) 524-9870

Email: rita.pauls@berlitz.de (please add "California Minor Removal Request" to the subject line)

Changes

Due to the changing nature of the Internet, Berlitz reserves the right to change this Policy at any time. This Policy was last updated November 4, 2016.

Information Received from the European Union, European Economic Area, or Switzerland

For personal information received from the European Union, European Economic Area, or Switzerland, Berlitz (including its Affiliates listed in the "Affiliated Parties" section above) is committed to handling your personal information in accordance with this Policy and the EU-U.S. Privacy Shield (or the Swiss-U.S. Privacy Shield, as the case may be), as administered by the U.S. Department of Commerce. If there is any conflict between the terms of this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the EU-U.S. and Swiss-U.S. Privacy Shield

frameworks, and to view Berlitz' certification, please visit <https://www.privacyshield.gov/list>.

Berlitz' accountability for personal information that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Berlitz remains responsible and liable under the Privacy Shield Principles if third parties engaged by Berlitz process the personal information in a manner inconsistent with the Principles, unless Berlitz proves that it is not responsible for the event giving rise to the damage.

If you are a past or present employee of Berlitz who is based in the European Union, European Economic Area, or Switzerland, Berlitz may collect certain personal information in the context of your employment with Berlitz, a Berlitz subsidiary, franchisee, or agent, such as your contact information, employment and academic history, financial information, age, gender, nationality, date and place of birth, marital status, language skills, employee and government IDs, income, dates of employment, and tax information ("Human Resources Data"). Human Resources Data is transferred and processed for purposes of administration and communication, and to comply with labor law requirements.

As further explained in the "How Can You Contact Us?" section below, we encourage you to contact us should you have a Privacy Shield-related (or general privacy-related) complaint.

How Can You Contact Us?

If you have any questions or comments about this Policy, please [select your country](#) and use the Contact form. Complaints will be resolved internally in accordance with Berlitz' complaints procedures. If you live in the European Union, European Economic Area, or Switzerland and efforts to resolve the matter internally are unsatisfactory, the complaint may be submitted to the American Arbitration Association (<http://www.adr.org>), which has been selected as the independent recourse mechanism to resolve complaints and disputes relating to treatment of data originating in the European Union, European Economic Area, or Switzerland under this Policy. Berlitz is

subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

If you are a past or present employee of Berlitz in the European Union, European Economic Area, or Switzerland, Berlitz has also chosen to cooperate with and comply with the advice of EU data protection authorities (DPAs) in relation to such unresolved complaints (as further described in the Privacy Shield Principles). Please contact us to be directed to the relevant DPA contacts. As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means.

California Residents

Residents of the State of California have the right to request a list of all third parties to which we have disclosed certain information during the preceding year for the third parties' direct marketing purposes.

However, it is our policy to neither disclose personal information, nor to sell such information to third parties for direct marketing purposes.

Your Consent

By using our websites, you consent to our use of the information we collect from you according to this Privacy Policy. This includes our release of information within Berlitz and to others as described above.