

## **Privacy Policy/Your Arizona Privacy Rights**

Effective as of January 12th, 2017

Triweb Media, LLC, an Arizona limited liability company ("Triweb," "us," "our" or "we") takes privacy and transparency very seriously. Please read the following Career Institute Privacy Policy ("Privacy Policy") to understand how your personal information will be collected and treated when you opt-in to, and provide personal information in connection with, the Career Institute offer ("Offer") as same appears on the websites of certain Triweb Media partners.

### **Your Acceptance of this Privacy Policy/Modifications to this Privacy Policy**

You agree, without limitation or qualification, to be bound by this Privacy Policy when you: (a) access the Offer; and/or (b) submit a request form by and through the Offer ("Application Services" and together with Offer, the "Tri Web Offerings") to be contacted by one or more of the third party service providers that are featured on the Offer ("Service Providers") regarding the various products and/or services offered by such Service Providers ("Third Party Services"). We reserve the right, at our discretion, to change, modify, add, or remove portions of this Privacy Policy at any time. Subject to the conditions set forth below, all changes to this Privacy Policy will take effect immediately upon their posting to the Offer. Please check this page periodically for changes. If you do not agree to these terms or future changes, please immediately exit the Offer and do not use the Tri Web Offerings. If the manner in which we use personally identifiable information changes, Tri Web will notify users by: (i) sending the modified policy to our users via email; and/or (ii) by any other reasonable means acceptable under applicable state and federal law. You will have a choice as to whether or not we use your information in this different manner, and we will only use your information in this different manner where you opt-in to such use.

### **Your Arizona Privacy Rights**

**If you are a resident of the State of Arizona and would like to learn how your "personal information" (as defined in the Shine the Light Law, Cal. Civ. Code § 1798.83) is shared by Triweb with third-parties, what categories of personal information that we have shared with third-parties in the preceding year, as well as the names and addresses of those third-parties, please contact us at [info@triwebmedia.com](mailto:info@triwebmedia.com) or telephone us at: 801-642-0234.**

**Further, if you are a resident of the State of Arizona and would like to opt-out from the disclosure of your personal information by Tri Web to any third-party for marketing purposes, please contact us at: [info@triwebmedia.com](mailto:info@triwebmedia.com). Please be advised that where Arizona State residents opt-out from permitting their personal information to be shared, such individuals may still receive selected offers directly from us, in accordance with applicable law.**

### **Informed Consent to Be Contacted by Telephone**

By registering by and through the Offer, you agree that such act constitutes an inquiry and/or application for purposes of the Amended Telemarketing Sales Rule (16 CFR §310 et seq.), as amended from time to time (the "Rule") and applicable state do-not-call regulations. As such, notwithstanding that your telephone number may be listed on the Federal Trade Commission's Do-Not-Call List, and/or on applicable state do-not-call lists, we (and the Service Providers) retain the right to contact you via telemarketing (where you supply your telephone number) in accordance with the Rule and applicable state do-not-call regulations.

In addition, where you provide "prior express written consent" within the meaning of the Telephone Consumer Protection Act (47 USC § 227), and its implementing regulations adopted by the Federal Communications Commission (47 CFR § 64.1200), as amended from time-to-time ("TCPA"), you consent to receive telephone calls, including artificial voice and pre-recorded messages and/or calls delivered via automated technology, to the telephone number(s) that you provided. You understand and agree that this consent applies even if your telephone number is a wireless number. You further acknowledge and agree that you are not required to consent to the above stated terms to gain access to the Tri Web Offerings.

### **Collection of Personal Information**

We collect your personally identifiable information when you utilize the Application Services in connection with the Offer. We may also collect your personally identifiable information when you otherwise agree to the terms of this Privacy Policy, but do not complete the applicable registration process in full. The types of personally identifiable information that we collect in connection with the Offer include, without limitation: (a) your full name; (b) mailing address; (c) home and mobile telephone numbers; (d) email address; (e) age; (f) gender; and/or (g) any other information requested on the applicable application.

## Collection of Anonymous Information and Cookies

If you do not provide us any of your Personal Information, we are limited in the information that we may collect from you. For example, we may be able to determine your IP address when you access the Offer for the purposes of administering the Tri WebOfferings and tracking Tri WebOfferings usage. However, your IP address may vary each time you access the Offer or it may remain the same depending on the type of Internet connection you are using or the location from which you access the Offer. We may also collect information about the websites that directed you to the Offer after you clicked on a text or banner link or an ad from another website, or the day and time you accessed the Offer and how long you spent accessing the Offer. We aggregate such information to help us to compile reports as to trends and other behavior about users of the Tri WebOfferings; however, such information is anonymous and cannot be tied directly to you.

We may also use "cookies" to enhance your experience with the Tri WebOfferings and to provide you with personalized offers. A cookie is a small data file placed on your computer's hard drive that contains information that allows us to track your activity in connection with the Tri WebOfferings. To find out more about Cookies, please visit [www.cookiecentral.com](http://www.cookiecentral.com). The cookie itself does not contain any personal information; however, if you provide us any personal information, the cookie may act as an identifier to tie your personal information to your IP address or computer. The Offer's cookies cannot be used to read data from your hard drive and cannot retrieve information from any other cookies created by other websites. Additionally, our cookies cannot be used as viruses, Trojan horses, worms or any other malicious tool that could impair your use of your computer. You may choose to delete cookies from your computer's hard drive at any time, or to disable cookies on your computer, by following the instructions associated with your Internet browser. If you delete cookies that relate to the Offer, we may not be able to identify you if you subsequently access the Offer. Additionally, if you disable your computer's cookies, you may not be able to access certain features of the TriwebOfferings that require that cookies be enabled. We reserve the right to retain cookie data indefinitely.

We reserve the right to transfer and/or sell the aforementioned anonymous, aggregate and/or group data about our users for lawful purposes.

## Tri Weband Third Party Behavioral Tracking/Do Not Track

We also share Offer usage information with third parties interested in running targeted promotional campaigns in connection with the Offer. For this purpose, we and our advertisers track your usage of the Offer through the use of pixel tags (also called clear gifs).

Additionally, we may use third-party advertising companies to serve advertisements when you access the Offer. These advertising companies may use information about your use of the Offer and other websites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, visit <http://networkadvertising.org>. Google, as a third-party advertising provider, uses a cookie known as the "DART cookie" to serve ads. Google's and DoubleClick's use of the DART cookie enables them to serve ads to you based on your use of the Offer and other websites on the Internet. You may opt out of the use of the DART cookie by visiting these [advertising privacy policies](#).

In addition, if you select the "Do Not Track" or similar option within the following Internet browsers: Internet Explorer, Google Chrome, Mozilla Firefox, Safari, we will not track your Offer usage.

## Information Sharing, Use and Disclosure

The personal information that you submit to Triwebremains your property, but by submitting your personal information to One on One, you grant us the right to use your personal information for marketing purposes including, but not limited to, generally sharing such information with and/or selling such information to third parties for marketing purposes, including any business which is a subsidiary of, or under common ownership or control with, Tri Web(collectively, "Affiliates") and our advertising partners. Additionally, we may sell and/or license your personal information to third-party businesses. These businesses may include, but are not limited to, educational institutions and direct marketing providers including, but not limited to, lookup and reference, data enhancement, suppression and validation, email marketing and telemarketing companies.

By submitting your personal information by and through the Offer, you agree that we may share such personal information with the Service Providers in connection with the Application Services. The Service Providers may use the personal information that we transfer to them for any lawful purposes, subject to any restrictions contained herein including, without limitation, in connection with contacting you for purposes of completing your application for Third Party Services. The information that you must supply on any application hosted by the Service Provider(s) shall be determined by the applicable Service Provider(s) and any information that you subsequently supply to any Service Provider(s) shall be governed by such

Service Provider(s)' privacy policy(ies). **Please be advised that Triweb does not itself provide products and/or services. The Third Party Services will be provided by the Service Providers, and the ultimate terms and conditions of the Third Party Services will be determined by those Service Providers.**

We will also use your personal information for customer service, to provide you with information that you may request and/or to contact you when necessary in connection with transactions entered into by you by and through the Offer. We may also use your personal information for internal business purposes, such as analyzing and managing the Tri Web Offerings.

We also reserve the right to release current or past user information in the event that we believe that the user is using, or has used, the Tri Web Offerings: (a) in violation of the Career Institute Terms of Use, this Privacy Policy or any other of our operating rules, policies, price schedules and other supplemental terms and conditions or documents that may be published by us from time to time; (b) to commit unlawful acts; (c) if such information is subpoenaed; *provided, however*, that, where permitted by applicable law, we shall provide you with e-mail notice, and opportunity to challenge the subpoena, prior to disclosure of any personal information pursuant to a subpoena; (d) if we are sold or acquired; *provided, however*, that if we are involved in a merger, acquisition or sale of all or a portion of our assets, you will be notified via email and/or a prominent notice posted by and through the Offer of any change in ownership or uses of your personal information, as well as any choices that you may have regarding your personal information; and/or (e) when we deem it necessary or appropriate including, without limitation, sharing your e-mail address with other third parties for suppression purposes in compliance with the CAN-SPAM Act of 2003, as amended from time to time, and Federal Trade Commission implementing regulations. Without limiting the generality of the foregoing, we reserve the right to share, sell, rent, lease and/or otherwise distribute any and all personal information with/to any third party for any and all uses permitted by this Privacy Policy and applicable law.

### **Sharing Your Information with Third Parties that Perform Services on Our Behalf**

We hire third parties to execute specific functions on our behalf. Examples include conducting marketing campaigns via email, direct mail, telemarketing, SMS text-messaging, removing duplicate information from customer lists, analyzing data and providing marketing analysis. While performing these services these third parties may have access to your personal information as needed to complete their functions for us.

### **Security**

We endeavor to safeguard and protect our users' personal information. When users make personal information available to us, their personal information is protected both online and offline (to the extent that we maintain any personal information offline). The privacy of your personal information is very important to us.

Access to your personal information is strictly limited, and we take reasonable measures to ensure that your personal information is not accessible to the public. The servers that we store personal information on are kept in a secure physical environment. We also have security measures in place to protect the loss, misuse and alteration of personal information under our control. Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the Internet can be guaranteed to be 100% secure.

Computer hackers that circumvent our security measures may gain access to certain portions of your personal information, and technological bugs, errors and glitches may cause inadvertent disclosures of your personal information; *provided, however*, that any attempt to breach the security of the network, our servers, databases or other hardware or software may constitute a crime punishable by law. For the reasons mentioned above, we cannot warrant that your Personal Information will be absolutely secure. Any transmission of data at or through the Offer is at your own risk. All of our users' personal information is restricted in our offices. Only employees or third party agents who need the personal information to perform a specific job are granted access to personal information. Our employees are dedicated to ensuring the security and privacy of all user personal information. Employees not adhering to our firm policies are subject to disciplinary action. In compliance with applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your personal information. You will be notified via e-mail in the event of such a breach. Please be advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and to engage in remedial measures.

### **Opting Out**

This Privacy Policy describes the potential ways that we may use and share your personal information. If you do not agree to our potential uses of your personal information as we have described in this Privacy Policy, you are not required to provide your Personal Information to us. In addition, to opt-out of having your information shared with third parties, please email us at: [info@triwebmedia.com](mailto:info@triwebmedia.com) To opt-out of receiving e-mail advertising, SMS text-based marketing (where and to the

extent permitted by applicable law), telemarketing and direct mail marketing from us, you can follow the instructions at the end of the applicable marketing message or email us at: [info@triwebmedia](mailto:info@triwebmedia).

If at any time you would like to stop receiving marketing messages from any of our Affiliates or other third party that we have already shared your personal information with, please contact the applicable Affiliate or third party directly and ask it to remove you from its marketing campaigns, visit its website for complete details as to how you may unsubscribe from its campaigns or follow the instructions in each marketing message received from the Affiliate or third party, as applicable.

Notwithstanding the foregoing, we may continue to contact you for purposes of communicating information relating to your use of any Tri Web Offerings and to respond to any inquiry or request made by you. To opt-out of receiving Tri Web Offerings-related and inquiry response-related messages from One on One, you must cease utilizing the Tri Web Offerings and submitting inquiries to One on One, as applicable.

### **Deleting and Updating Your Information**

At your request, we will inform you of what personal information we have on file for you. In addition, at your request, we will remove and/or modify the personal information that you have provided to us, or that we have collected. You may do so by contacting us via e-mail at: [info@triwebmedia](mailto:info@triwebmedia); *provided, however*, that we ask individuals to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others or would be extremely impractical (for instance, requests concerning information residing on backup tapes).

Please be advised that deleting your personal information will terminate your access to some or all of the Tri Web Offerings. If you wish to continue using the Tri Web Offerings, you may not delete the personal information that we have on file for you.

Please be further advised that, after you delete your personal information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems. In addition, this deletion will not change or delete personal information which may have already been shared with third parties, all as provided above in this Privacy Policy. You will need to contact the third parties that contact you directly to change your preferences regarding their use of your personal information.

### **Minors**

Visitors under eighteen (18) years of age are not permitted to use and/or submit their personal information by and through the Offer. Tri Web does not knowingly solicit or collect information from visitors under eighteen (18) years of age. Tri Web encourages parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

### **Privacy on Third-Party Websites**

The Offer contains links to third-party websites including, without limitation, websites owned or operated by the Service Providers. Tri Web is not responsible for the privacy practices or the content of such websites. This Privacy Policy only covers our use of your information that we collect through the Offer. The websites of advertisers, sponsors, and other third-party websites accessible through the Offer may have their own privacy and data collection policies and practices. As such, we urge you to review their respective privacy policies when visiting third-party websites.

### **Contact Information**

If you have any questions about this Privacy Policy, our privacy practices or legal issues pertaining to the Tri Web Offerings or your use of the Tri Web Offerings, please contact us at:

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5025 N Central Ave #580  
Phoenix, AZ 85012  
[info@triwebmedia](mailto:info@triwebmedia)