**Credly Privacy Policy***Last Revised March \_\_\_, 2017*

This privacy policy (the “Privacy Policy”) describes how Credly, Inc. and its affiliates (“Credly”, "we" or "us") treats information you provide to us or that we collect, including how we use and disclose it, how we protect its security, and how you may access it and require us to change it on our systems. This Privacy Policy applies to any information associated with you that we acquire in conjunction with your use or potential use of our public website at [https://credly.com](https://credly.com/) (the “Website”) and/or Credly’s permission-based, online, micro-credentialing service, including any related mobile apps (collectively, together with any other services, websites and applications offered by Credly, the “Service”), as well as certain information we generate related to your use of our Website or the Service (collectively, "Personal Information"). This Privacy Policy describes our broadest potential use of your Personal Information, although we may actually make far less use. The Service utilizes various tools, including, but not limited to, the Website and mobile apps, and allow users to interact online and issue and receive data-rich digital credentials known as “badges” or “credentials” (“Credentials”). In addition to acquiring Personal Information directly from you, we may acquire your Personal Information from Issuing Organizations (as defined below) and Third-Party Services (as defined below).

We will process your Personal Information for the purpose of permitting you to use the Service, including the Website, as applicable. The basis for our processing of your Personal Information is your consent. No law requires you to provide us with your Personal Information. You may withdraw your consent for us to process your Personal Information at any time, but that may preclude you thereafter from using the Website and the Service. Such withdrawal will not affect the lawfulness of processing prior to withdrawal.

By your use of the Website or the Service you consent to our use and disclosure of your Personal Information in accordance with this Privacy Policy**.**

1. **OUR WEBSITE**

Credly collects certain Personal Information through our Website when you choose to submit it through e-mail, an online form, or other method. We also collect information about website users through cookies. For further information about cookies, please see our “Credly Use of ‘cookies’” section below.

Credly also maintains a log of certain information concerning visitors to our Website, including but not limited to, internet protocol (“IP”) address (a computer's numerical Internet address), third party websites from which visitors access our Website, type of web browsers used, and pages viewed. Such information may be treated as Personal Information.

**Electronic Communications Protocols and Web Beacons.** We may collect information about you and your use of the Website through electronic communications protocols, web beacons, cookies, embedded URLs, pixel tags and related devices or technologies. As is true when you visit most websites, certain information is automatically generated and stored about your visits. Credly may automatically receive information from you as part of the communication connection between you and the Website. Such information may include: network routing information (for example, where you came from); equipment information (for example, device type, operating system, browser type); IP address, and dates and times of your visits.

We may use your Personal Information to inform you about other Credly services that might interest you and to gather feedback from you.

1. **THE CREDLY SERVICE**

The Service is an internet-based, hosted platform designed to enable subscribers to the Service (“Issuing Organizations”) to issue Credentials to individuals who meet prescribed requirements, and for those individuals to display the Credentials online on the Service or on third party sites, as elected by each individual. The Service permits authorized users to access and share information. If you decide to subscribe to our Service, we may use your Personal Information to provide the Service to you. We may provide your information to trusted partners who work on behalf of, or with, Credly under confidentiality agreements to help Credly provide the Service.  They may also assist Credly in communicating with you about the Service and about offers from Credly and our partners, where you have given us appropriate permissions.

**Information about You That You Give Us.** When registering for or using the Service, you may be prompted to give us information about yourself. When you configure your account settings, you may enter additional information about yourself. You may also select user configuration settings that determine how the Service looks and functions. You may, at times, also send us an e-mail which may contain not only your e-mail address, but other information about you, including home or business addresses, telephone numbers, or account details. The information you give us may also include statements you make on the Service or our Website such as testimonials, services reviews, or other statements that may identify you personally.

Using this information, we will provide you with a user ID (an e-mail address) and account activation e-mail for you to access the Service and create a user “profile” for use as described below. When you first sign onto the Service, you will be presented with your profile, which contains the information supplied to us. You will be able to update or correct any of the contact information in your profile. By providing, updating, or accepting your contact information in your profile, you consent to our use of it in a manner consistent with this Privacy Policy. If you do not consent to our use of your information, you will not be allowed to use the Service.

Once your information has been entered into your profile, this information is added to the user list for the Service. You may receive certain e-mails relating to your use of the Service. Your contact information is also added to Credly's directory of current and former users of the Service. If you receive another Credential from other Issuing Organizations, your user ID will be authorized to access the Service, and your contact information will be added to the participant list for that Issuing Organization. Your contact information is also added to Credly's global directory of current and former users of the Service. If Credly were sold to or merged with another company, the global directory may be transferred to a successor of Credly, which agrees to abide by the terms of this Privacy Policy. You have the right to request that your Personal Information be removed from our records at any time (see below). We may use your information to contact you regarding your use of the Service, for customer support purposes, and to inform you of updates, modifications and other matters relating to the Service, and information about others services that we offer. However, you may decline to receive mail or e-mail from us that does not relate directly to your access to or use of the Service by selecting the opt-out link contained in any such e-mail.

Credly also will maintain a history of your access to the Service, and certain actions taken by you while accessing the Service, a log of users' IP addresses, the third party websites from which users access the Service, the type of web browsers used to access the Service and the browser's settings that may affect Service performance (collectively, “Usage Log Information”). Usage Log Information may be treated as Personal Information about you. For purposes of maintaining and enhancing Service performance and security, Credly may use Usage Log Information, information about your browser, and other local computer settings. We also may use Usage Log Information to tailor our communications to you about the Service, and contact you in relation to providing support. We also may aggregate Usage Log Information to create or publish statistical analyses and reports about Service usage. We will not authorize the publication of Personal Information about any user without the prior written consent of such person.

**Information about You Received from Issuing Organizations.** Issuing Organizations may provide information to us for use on the Service, including credential requirements, and information about you to confirm that you have fulfilled any such requirements and qualified to receive the applicable Credential. We may also collect contact information from publicly-available sources, and may use it to contact you about other services that we or our partners offer that we think might interest you. You may decline to receive mail or e-mail from us by selecting the opt-out link which will be contained in any such e-mail, or by contacting us using the details below.

**Information about You Received from Third-Party Services or Other Users.** If you log into the Service using credentials associated with your account at third-party services such as Facebook, LinkedIn, or Twitter (collectively, “Third-Party Service”), you thereby authorize Credly to access certain information associated with your account with the Third-Party Service, based on the privacy settings you establish at the Third-Party Service. Please review the privacy policies of any Third-Party Services from which you access the Service (please see **Third-Party Sites** Section below regarding use of those Third-Party Services). If you utilize a Third-Party Service to log into the Service, other users to whom you may be connected through such Third-Party Service may able to see that you are a user of the Service or may view or follow information about you on the Service. Other users of the Service may also make statements about you on the Service, including the Website, such as testimonials, services reviews, or other statements that may include information that identifies you personally.

**Additional Uses of Service Information**. In addition to the uses described above of the Information received in connection with your use of the Service, Credly uses and, where specified, shares your information:

* **To issue, process, and display Credentials.** Credly may use your information to determine whether you meet the criteria for receipt of a Credential, to confirm your identity, or to display Credentials that you receive on the Service or on Third-Party Services, embeds that you make on the Service or third parties’ websites, or on social network services you link to your account.
* **To provide support or other services** that you have requested, and to respond to your inquiries.
* **To engage in transactions** with you, including contacting you about your account or transactions.
* **To process transactions,** Credly may use financial, credit card and payment information that you provide. Credly may need to share some of this information with suppliers, delivery services, credit card clearing houses and other third parties to complete the transactions.
* **To interact with Third-Party Services.** If you log in to the Service using an account from a Third-Party Service, Credly may contact you via an e-mail address associated with your account at the Third-Party Service and post status updates, notes, photos, videos, and other materials to the Third-Party Service on your behalf pursuant to the permissions that you grant.
* **To notify you of relevant opportunities such as** new product releases and service developments, related facts or programming that may be relevant to you, or to serve advertisements that may interest you.
* **To respond directly** to your requests for information.
* **To provide online forums and social networks.** The Service allows users to participate in interactive discussions and post comments and other content. Note that any information you share may become publicly accessible.
* **To improve quality and facilitate use of the Service.**
* **To operate the Service through the assistance of third parties.** Credly may use services from third-party service providers, such as hosting services and software developers, in support of its operation of the Service. When doing so, we will take steps to ensure that such service providers implement appropriate privacy and security measures consistent with this Privacy Policy to safeguard against the unauthorized use or disclosure of your information.
* **To comply with legal requirements.**  In addition, we may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our rights or protect our operations or users or others.
1. **General**

**Location-Based Services.** The device you use to access the Website or Service may provide your location to us. This information may be shared with Issuing Organizations in connection with the issuance of Credentials, where location is relevant to completion of the achievement recognized by the Credential.

**Privacy Preferences**. The Service may provide tools for you to customize the information about yourself that is made accessible to others. You may set global values that apply generally, or you may customize selections to fine tune your preferences. When you establish an account, the Service applies default settings that apply unless you change them. Default settings also apply when the Service introduces new features. Although all Credentials initially issued to you will be accessible only by you, you may elect to opt-out of the “public” setting for any Credential. If you do not opt-out of the public setting, you may subsequently activate a privacy setting such that the Credential will no longer be publicly accessed. Until you terminate your use of the Service, the fact that you are such a user, as indicated by the public display of your full name, is available to others on the Service, and your use of the Service indicates your acceptance of these settings. You should review your privacy settings regularly to ensure that they match your preferences.

**Security**. Credly takes appropriate and reasonable precautions to implement appropriate administrative and technical procedures to protect the security of Personal Information provided or generated through its Website and the Service. We permit persons working for us to access and use your information only in a manner consistent with this Privacy Policy.

We protect the security of your information during transmission by using Transport Layer Security (TLS) and Secure Sockets Layer (SSL) software or other encryption technology, which encrypts information you input. Wherever appropriate, we obfuscate and/or encrypt information in our systems and/or during information transfer. Credly regularly reviews the cryptographic protocols it uses to protect the privacy and security of your Personal Information.

Because of the nature of internet and for other reasons, we cannot guarantee the security of your Personal Information, so you should take precautions to protect it when you are on the internet, such as changing passwords often, using a combination of letters and numbers when creating passwords, using a secure browser and being sure to log off the Service when finished using a shared computer.

Notwithstanding any other provision of this Privacy Policy, Credly may disclose contact information about you (1) in response to legal process or in accordance with its internal policy on access by governmental authorities; and (2) in its sole discretion if it believes such disclosure is appropriate in connection with a governmental investigation, or under exigent circumstances in response to a perceived significant threat to a person's health or property.

**Your California Privacy Rights.** Under California Civil Code Section 1798.83, a California resident with a business relationship with Credly that is primarily for personal, family or household purposes, may request certain data regarding Credly’s disclosure, if any, of Personal Information to third parties for the third parties’ direct marketing. To make such a request, please send an e-mail to privacy@credly.com with "Request for California Privacy Information" in the subject line. You may make such a request once per calendar year. If applicable, we will provide you a list of the categories of Personal Information disclosed to third parties for their direct marketing during the immediately preceding calendar year, along with the third parties' names and addresses. Not all Personal Information sharing is covered by Section 1798.83.

**Third-Party Sites.** The Website may include hyperlinks to third-party websites neither owned nor managed by us, and, as described above in the ***Information about You Received from Third-Party Services or Other Users*** Section, you may use certain Third-Party Services in connection with the Credentials issued through the Service. Credly is not associated with these third-party websites or Third Party Services and has no control over them. Your interactions with those third parties are subject to their privacy policies and terms of use, which we encourage you to review.

**Credly Use of "cookies".** Our Website uses cookies to distinguish you from other users and to collect information about your online preferences. This helps us provide you with a good experience when you browse our Website and allows us to improve our Website.

A cookie is a small piece of information, sent by a web server to a web browser, that is stored on your computer so that it can later be read, allowing the server to uniquely identify the browser. Our main purpose in using cookies is to facilitate and enhance communications and interactions between you and the Website, but cookies can be used for other purposes. Cookies for the Service may collect a unique identifier, user configuration settings and profile information. Credly also uses cookies to collect general usage and volume statistical information that does not include personally identifiable information. Some cookies may remain on a user's computer after the user leaves the Website. Most browsers provide you with information on and control over cookies, including a feature to opt-out of the use of cookies. You can set your browser to alert you when a cookie is being used, and accept or reject it. You can also set your browser to refuse all cookies or accept only cookies returned to the originating servers. However, you may not be able to use some features of the Website if you disable cookies.

**By continuing to browse the Website, you consent to our use of cookies.**

We use the following cookies:

* **Strictly necessary cookies** required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website.
* **Analytical/performance cookies** that collect information about how you use our Website. They allow us to recognize and count the number of visitors and to see how visitors move around our Website. This helps us to improve the way our Website works. These cookies are sometimes placed by third party providers of web traffic analysis services, such as Google Analytics.
* **Functionality cookies** that remember choices you make and recognize you when you return. This enables us to personalize our content, greet you by name and remember your preferences (for example, your choice of language or region).
* **Targeting cookies** that collect information about your browsing habits such as the pages you have visited and the links you have followed. We use this information to make our Website more relevant to your interests, and, if we enable advertising, to make advertising more relevant to you, as well as to limit the number of times you see an ad. These cookies are usually placed by third-party advertising networks. They remember the other websites that you visit and this information is shared with third-party organizations, for example advertisers.

We use Google Analytics. For information on how Google processes and collects your information regarding this product and how you can opt-out, please see  [https://tools.google.com/dlpage/gaoptout](https://www.google.com/policies/privacy/partners/).

Most internet browsers accept cookies by default. However, you can block cookies by activating the setting on your browser that allows you to reject all or some cookies. The help and support area on your internet browser has instructions on how to block or delete cookies.

Credly and its service providers, vendors and partners, may use cross-device/cross-context tracking. For example, you might use multiple browsers on a single device, or use various devices (such as desktops, smartphones, and tablets), which can result in your having multiple accounts or profiles across these various contexts and devices. Cross-device/cross-context technology may be used to connect these various accounts or profiles and the corresponding data from the different contexts and devices.

**Third-Party Cookies and Functions**. Credly may use third-party advertisers to serve or track advertisements **within the Service, including th**e Website. These third parties may use cookies, pixel tags and other technologies to, among other things, record which ads your browser has loaded and which pages you were viewing when ads were delivered or accessed. Information so collected is subject to the privacy policies of those third parties which you should carefully review (please see the ***Third-Party Sites*** Section above). Credly has limited or no control over third party use of cookies.

For more information on managing cookies, please go to [www.allaboutcookies.org](http://www.allaboutcookies.org), or visit [www.youronlinechoices.com](http://www.youronlinechoices.com) which has further information about behavioral advertising and online privacy.

**Access and Correction**. If you reside in the European Economic Area (“EEA”), subject to certain exceptions, you have a right to:

* Learn whether we are processing your Personal Information and, if so, to gain access to it and certain information about it;
* Have inaccurate Personal Information corrected, and to have incomplete Personal Information completed;
* Have your Personal Information erased when:
	+ It is no longer necessary for the purposes collected;
	+ You withdraw consent to process it;
	+ We have processed it unlawfully; or
	+ EU or Member State law to which we are subject requires erasure;
* Restrict our processing of your Personal Information when:
	+ You contest its accuracy (for a period necessary to verify it);
	+ The processing is unlawful and you prefer restriction of use to erasure; or
	+ We no longer need the data, but you need it in connection with legal claims
* Obtain in usable form the Personal Information you gave us and, if technically feasible, require its transmittal directly to another controller that you designate;
* Lodge a complaint with a Member State data protection supervisory authority

To exercise these rights, you may communicate with our Data Protection Officer, using the contact information at the end of this statement.

**Sensitive Information.** Do not send us any sensitive Personal Information (e.g., social security numbers or other national identifiers, or information related to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sex life or sexual orientation, genetic or biometric information, criminal background, or trade union membership).

**Retention and Deletion.** Credly may retain your Personal Information for so long as retention is required or permitted by law. When Credly deletes your Personal Information, Credly will do so in a manner designed to ensure that it cannot be reconstructed.

**Viewing of Data for Support**. For the purpose of providing support, Credly may view your Personal Information, stored in servers in the EEA, from nations outside the EEA that are deemed by the EU to have non-adequate data protection laws. Credly may process your Personal Information in providing support from such nations.

**No Use by Minors.** The Service is intended for use by adults only. In connection with the Service, Credly does not promote online to children and does not intentionally collect any personally identifiable information from children under the age of thirteen (13). If you believe that a person under the age of thirteen has disclosed personally identifiable information through the Service, please report this to us immediately by e-mailing us at: privacy@credly.com with “Notice of Underage Person” in the subject line. Credly offers legally compliant alternative versions of the Service for children under the age of thirteen and the Issuing Organizations that serve them. This Privacy Policy does not cover such alternative versions.

**Corporate Matters**. Credly may provide our investors, partners, and others with aggregated information (*i.e.*, information that does not identify users personally) concerning users of the Service. In addition, Credly may disclose your Personal Information to a successor or acquiring entity as part of a merger, acquisition, reorganization, or other transaction involving all or substantially all of Credly’s assets or shares, or the business to which the Service relates.

**Policy Updates.** We may, in our sole discretion, update this Privacy Policy from time to time, and the updated version will be effective upon posting as to our treatment of subsequently acquired Personal Information. Please check the revision date at the beginning of this Privacy Policy periodically to check for revisions. By continuing to use the Service, including the Website, after a revised version has been posted, you agree to be bound by the revised Privacy Policy as to subsequently acquired Personal Information.

If you have questions about this Privacy Policy and our information practices, please contact us by e-mail at privacy@credly.com or at the following address:

Credly, Inc.

404 5th Avenue, 3rd Floor

New York, NY 10018

Attention: General Counsel

Data Protection Officer

404 5th Avenue, 3rd Floor

New York, NY 10018

dpo@credly.com