

ANCORA EDUCATION DATA PRIVACY POLICY

Last Updated April 7, 2020

Ancora Education ("Ancora Education", "we", "us") is committed to safeguarding your privacy. We want you to know what information we collect, how we use that information, and how you can request that this information is updated, corrected, or deleted. This privacy policy ("Privacy Policy") is designed to inform you about the types of personal information ("PI") Ancora Education collects from you on hard copy forms, by phone, or in connection with your use of one of our websites ("the Site"). It is also intended to explain the conditions under which Ancora Education uses and discloses that information and your rights relating to the collection, use, and disclosure of that information.

YOUR CONSENT

When providing your PI on paper forms, by phone, or by using the Site, you consent to our collection and use of your personal information as described in this Privacy Policy. Please review the entire policy to learn about what type of information is gathered, how such information is used and what information may be disclosed to third parties.

WHAT PERSONALLY IDENTIFIABLE INFORMATION DOES ANCORA EDUCATION COLLECT FROM ME?

Ancora Education collects various types of personally identifiable information and non-personally identifiable information through our Site and/or when we talk to you on the phone and meet with you in person. Personally identifiable information may include your name, address, email address, phone number, gender, social security number, driver license number, criminal background check, drug screening results, credit card/financial account information, occupation, industry and personal interests, photograph, and user account password ("Personal information", "Identifiers"). This Personally identifiable information is used to create a customer profile in our database to track contact, status of enrollment in courses/programs, attendance, and

program/course progression, grades, and completion. Driver license number, criminal background check, and drug screening results are used in CDL programs for Motor Vehicle Records (“MVR”) reports/driving records. Credit card/financial account information provided is used to make payments as scheduled and authorized. We may ask you for Personal information, including (but not limited to) when you download a file (such as a .PDF file) from us; when you ask us to contact you; when you join our mailing list; when you enroll in a course or program, when you enter information to make a financial payment, and when you report a problem with one of our sites or services. If you contact Ancora Education, we may keep a record of that correspondence. Ancora Education may also occasionally ask users to complete surveys that we use for research. If you communicate to us by e-mail, we will record the e-mail address from which you send your message. Any telephone calls to and from Ancora Education may be monitored and recorded for quality assurance and training purposes. Ancora Education may also obtain Personal information from third-party vendors (“Affiliates”) when you voluntarily provide such information to a vendor and request information about an Ancora Education educational program.

WHAT NON-PERSONALLY IDENTIFIABLE INFORMATION DOES ANCORA EDUCATION COLLECT FROM ME?

Non-personally identifying information (“Aggregate information”) is information that, without the aid of additional information, cannot be directly associated with a specific person. Like most website operators, we collect Aggregate information about your activities online (such as the pages you access most frequently) through the use of cookies, web beacons, Internet Protocol (IP) addresses, browser and other computer information, click-through URLs, and domain name tracking. If you have voluntarily disclosed Personal information to Ancora Education, some or all of the Aggregate information may be linked to your Personal information.

Cookies

As part of offering and providing customizable and personalized services, Ancora Education uses cookies to store and sometimes track information about you. A cookie is a small data file that is sent to your browser from our web server and stored on your computer's hard drive.

(1) Remind us of who you are and to access your information (stored on our computers) in order to deliver to you a better and more personalized service. For example, a cookie is set when you register or "Sign In" and is modified when you "Sign Out" of our services.

(2) Automate certain areas of the Ancora Education websites or online forms.

(3) Estimate our audience size. Each browser accessing the Ancora Education website is given a unique cookie which is then used to determine the extent of repeat usage, usage by a registered user versus by an unregistered user, and to help target advertisements based on user interests and behavior.

(4) Measure certain traffic patterns, which areas of the Ancora Education website you have visited, and your visiting patterns in the aggregate. We use this research to understand how our users' habits are similar or different from one another so that we can make each new experience on the Ancora Education website a better one. We may use this information to better personalize the content and promotions that you and other users will see on our sites.

For some of the reasons listed above Ancora Education does tie Personally information such as your email address to our cookies, for instance, if you register to access certain areas of our website.

You also have choices with respect to cookies. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. Please refer to your browser's help section for further information about your options for controlling or monitoring cookies. However, some parts of the Site may not function properly if you choose not to accept cookies.

Web Beacons

We and third parties employ on our sites a software technology called Web Beacons, that help us better manage content on our site by informing us what content is effective. Web Beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, Web Beacons are embedded invisibly on web pages and are about the size of the period at the end of this sentence. Web Beacons generally work in conjunction with cookies, registering

when a particular computer visits a particular page. We tie the information gathered by Web Beacons to our customers' personally identifiable information.

We also use Web Beacons in outgoing HTML-based emails to track the success of marketing efforts, so we can improve our systems. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you do not want to receive Web Beacons in emails you can opt-out of these emails or change the type of email you receive to text only.

We engage a third-party tracking service that uses cookies and Web beacons to track aggregated, non-personally identifiable information about visitors to our site, in order to track usage and volume statistics and our websites.

Internet Protocol (IP) Address

Ancora Education's servers also automatically identify your computer by its Internet Protocol (IP) address. An IP address is a number that is automatically assigned to your computer by your Internet service provider. Your IP address does not identify you by name, however, it may reveal your geographic area and your Internet service provider. Ancora Education may match your IP address to your Personal information.

Computer Profiles

Ancora Education may also collect and accumulate computer profile data which will help us understand and analyze the Internet experience of our visitors. For example, Ancora Education may collect data relating to the type of browser used, operating system software, screen resolution, color capability, browser plug-ins, language settings, cookie preferences, search engine keywords, and JavaScript enablement.

Click Through URLs

Ancora Education may send you e-mail messages with a "click-through URL" linked to the content of the Site. When you click onto one of these URLs, you will pass through our server before arriving at the destination webpage. Ancora Education may track this click-through data to help us determine subscriber interest in the subject matter and measure the effectiveness of our subscriber communications. You can avoid being tracked simply by not clicking on any links or images in the e-mail.

Domain Name Tracking

When you visit the Site, we automatically record the name of the domain from which you accessed the Site. Additionally, if you got to the Site by means of a link from another site, our computers will note the fact that you came to us from that linked site.

HOW DOES ANCORA EDUCATION USE MY INFORMATION?

Ancora Education's primary goal in collecting information is to provide you, the user, with a customized experience on our Site, and to service your request. This includes personalization services and interactive communications.

We will not sell, rent or lease your Personal information to others. In addition to the uses described above, we may collect, use and disclose Personal information and Aggregate information (collectively "User information") for the following purposes:

- to determine your admissibility and to register you for your selected educational programs
- to provide requested products and services
- to respond to your inquiries
- to administer promotions to which you have indicated an interest
- for our internal marketing purposes, which includes, but is not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you
- for fostering communication and collaboration among members of the Ancora Education community through Social Networks
- for sharing with our Service Providers and Affiliates who are performing services on our behalf or who you have authorized to receive your user information
- to analyze how Sites and services are being accessed and used
- to improve Site and service performance and delivery
- to analyze academic and learning outcomes and preferences

- to analyze risk and business results
- to obtain payment for services that we provide to you
- to maintain business records for reasonable periods
- to provide to third parties in connection with the contemplated or actual reorganization, merger, acquisition, financing, securitization, insuring, sale or other disposal of all or part of our business or assets, including for the purposes of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In the event of any actual reorganization, merger, or acquisition such information may be transferred as part of the transaction to the acquirer
- and/or as may be required or permitted by legal, regulatory, industry self-regulatory, insurance, audit, or security requirements applicable to Ancora Education, our Service Providers or Affiliates.

Customer Testimonials/Comments/Reviews

Ancora Education may post customer testimonials/comments/reviews on our websites, which may contain personally identifiable information. We do obtain the customer's consent to post his/her name prior to posting the testimonial.

Updating/Accessing/Amending/Correcting/Deleting Personally Identifiable Information

If your personally identifiable information changes, you may correct it by contacting us with your new contact information at privacy@ancoraeducation.com or at 866-676-8552. If you would like us to delete any of your Personally Identifiable Information, please send that request to privacy@ancoraeducation.com or call us at 866-676-8552.

Opt-out Request

Ancora Education respects your communication preferences and our desire is to provide you the information you desire in the format that works best for you and your family. To opt-out from further marketing communications from any of our campuses, complete and submit the Opt-Out Request Form by clicking on this link: Opt-Out

Request Form. Students who are currently enrolled may not opt out of receiving email or telephone communications.

Note: Do not use this form to change personal information.

Surveys or Contests

From time-to-time, we may provide you the opportunity to participate in surveys on our site. If you participate, we may request certain personally identifiable information from you. Participation in these surveys is completely voluntary and you, therefore, have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information (such as zip code).

We use information collected to monitor company efforts to reach our target audience, as well as to understand how our audience perceives these efforts.

We may use a third party service provider to conduct these surveys or contests; that company will be prohibited from using our users' personally identifiable information for any other purpose.

Customer Service

By submitting Personal information online as part of a request for information or application for enrollment, you consent to receive further communications from Ancora Education and its Service Providers, including but not limited to telephone calls, mail, email, and/or texts regarding our products and services. We will also communicate with you in response to your inquiries, to provide the services you request, and to manage your account.

WITH WHOM DOES ANCORA EDUCATION SHARE MY INFORMATION?

Ancora Education does not sell or rent user information to anyone. Ancora Education will not disclose any of your personally identifiable information except when we have your permission or as disclosed in this privacy policy and as disclosed herein.

Service Providers

We occasionally use third parties hired to perform services on our behalf, including but not limited to, providing marketing assistance, sending direct mail or email, website or database hosting companies, e-mail service providers, analytics companies, and third-party call centers (“Service Providers”). Unless otherwise stated, these companies are prohibited from using your Personal information beyond what is necessary for them to assist us.

Business Transitions

In the event Ancora Education goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your User information will likely be among the assets transferred. Similarly, your User information may be passed on to a successor in interest in the event of a reorganization, reconstruction, liquidation, bankruptcy or administration.

Legal Disclaimer Concerning Subpoenas And Other Matters.

Ancora Education reserves the right to release account and User information about you when Ancora Education believes, in its sole discretion, that such release is appropriate to (1) comply with the law, legal process or law enforcement requests; (2) protect and defend our rights, property, safety or other interests including those of our parent company, Affiliates, Service Providers, customers, shareholders, or others; (3) protect against misuse or unauthorized use of the Site and to enforce or apply our Terms of Use and other agreements; or (4) protect the personal safety or property of our users or the public.

USER DISCLOSURES

Some Personal information is disclosed as a matter of course as a result of the users’ use of the Site or third-party applications and websites. Any personal information shared via any mobile application or on another website (such as Facebook, YouTube, Google+ or Twitter) may become public information. We cannot control the use of information disclosed in public forums, such as social media sites, bulletin boards, blogs, chat rooms, and networking functions of mobile applications. You should exercise caution when disclosing information in these public areas, especially your Location-Data, and be careful how you disclose your Personal information. Content posted in public areas of our mobile applications and social media pages, including advice and opinions, represents the views and is the responsibility of those who post the content. We do not necessarily endorse, support, verify, or agree with the content

posted. If you have any questions or comments about any content on our social media pages please contact us at the address below.

USERS ASSUME ALL RESPONSIBILITY FOR ANY LOSS OF PRIVACY OR OTHER HARM RESULTING FROM THEIR OWN VOLUNTARY DISCLOSURE OF PERSONAL INFORMATION IN PUBLIC FORUMS.

LINKS TO OTHER SITES

If you click on a link to a third party site, including on an advertisement (“Third Party Websites”), you will leave the Ancora Education site you are visiting and go to the site you selected. Because we cannot control the activities of third parties, we cannot accept responsibility for any use of your personally identifiable information by such third parties, and we cannot guarantee that they will adhere to the same privacy practices as Ancora Education. The links to Third Party Websites may be to advertisers, content providers or partners who may use our logo and/or style as a result of a co-branding agreement. Third Party Websites may send their own cookies to you and may collect information and use it in a way inconsistent with this Privacy Policy. We encourage you to review the privacy statements of any other service provider from whom you request services. If you visit a third party website that is linked to an Ancora Education site, you should read that site's privacy statement before providing any personally identifiable information. Ancora Education does not control the content that appears on these sites and takes no responsibility for their content, nor should it be implied that Ancora Education endorses or otherwise recommends Third Parties Websites or their products or services offered.

AFFILIATES

Ancora Education contracts with Affiliates that collect Personal information from users who have requested information about one of the educational programs or otherwise requested our services. The collection and use of information by Affiliates is governed by the privacy policies listed on the Affiliate website where the

information was submitted by the user. Affiliates may send their own cookies and web beacons to you and may collect information and use it in a way inconsistent with this Privacy Policy. Please carefully review these privacy policies to understand how your information may be collected, used and disclosed by these Affiliates. Ancora Education may disclose enrollment information and aggregate statistics to an Affiliate to whom you have disclosed your Personal information, for the purpose of evaluating the quality and efficacy of the Affiliate's marketing efforts.

CHILDREN'S PRIVACY

This Site is intended for adult use only and is not directed towards children, minors or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with personally identifying information. If the parent or guardian of a child under 13 believes that their child has provided us with any personal data, the parent or guardian of that child should contact our us at the address below and ask to have this personal information deleted from our files. Ancora Education does not sell the PI of children, minors, or anyone under the age of 18.

MY RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT (“CCPA”)

CCPA grants California consumers certain rights with respect to their data. California consumers have the right to ask Ancora Education what data they collect and what we do with it. Consumers also have the right to ask Ancora Education to delete their data, or to stop selling it, as applicable. This information and instructions on how to exercise your rights is provided within this Privacy Policy. The identity verification process before providing PI is for Ancora Education to matching information provided by the consumer to the information that Ancora Education already possesses. Ancora Education does not disclose any of the following PI: social security number, driver license number, financial account numbers, or account passwords. You can designate an authorized agent to make CCPA requests on your behalf by contacting us one of the ways identified in the “Updating/Accessing/Amending/Correcting/Deleting Personally Identifiable Information” section above.

WHAT ELSE SHOULD I KNOW ABOUT MY PRIVACY?

Please keep in mind that whenever you voluntarily disclose personal information online - for example on message boards, through email, or an instant message or chat areas - that this information can be collected and used by others. In short, if you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, Ancora Education cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems.

Ultimately, you are solely responsible for maintaining the secrecy of your passwords and/or any account information. Please be careful and responsible whenever you're online.

CHANGES IN THIS PRIVACY STATEMENT

If we decide to change our privacy practices, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it often if you have any questions or concerns.

CONTACT US

If you have any questions, concerns, or suggestions regarding our privacy policy or your rights, please contact us at privacy@ancoraeducation.com or via phone at 866-676-8552.

Link – Download or Print this Privacy Policy (link to a pdf of all text above)