



# Privacy Policy

Protecting your private information is our priority. This Privacy Policy applies to the [www.base-ed.com](http://www.base-ed.com) and BASE Education LLC (“BASE,” “we,” or “us”) and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to BASE Education include [www.base.education](http://www.base.education) and BASE.

The BASE Education application is an online education website. BASE works with educational, mental health, and other institutions (each, an “Organization”) to provide its educational services to the students and patients of those Organizations (each a “Participant”). BASE may also provide access to its application to the parents of Participants. By using the BASE application or any BASE website, you consent to the data practices described in this Privacy Policy. This Privacy Policy does not apply to websites or practices of companies that BASE does not own or control, or to individuals that BASE does not employ or manage.

Please note that BASE provides its services under the direction and control of the applicable Organization. If you are a Participant or the parent or guardian of a Participant with questions about your or a Participant’s personal information, please contact the Organization that is administering your version of the BASE application.

## Collection and Use of Participant Personal Information

**Organization-Uploaded Information.** The BASE application may be used to collect personally identifiable information about Participants. This information is entered into the BASE application by the Organizations. Organizations choose the types of personal information that they upload to the BASE application. This personal information generally may include, names, student or patient IDs, dates of birth, grade level, gender identity, and ethnicity. It will also include the courses that have been assigned to each Participant on the BASE application.

**Participant-Provided Information.** As part of our services for Organizations and their Participants, Participants directly upload content directly the BASE application. This includes the responses to coursework, including potentially deleted responses (as described in BASE’s application introductory materials) as well as communications with the Organization for assistance or potentially with BASE for technical assistance.

**Anonymous Surveys.** BASE may, from time to time, ask Participants to complete anonymous surveys after completing a course. These surveys are used to (a) better understand outcomes and (b) to improve our course offering to Participants. This anonymous data may be compiled and shared for BASE’s business purposes, in compliance with applicable laws.

**Use of Participant Information.** BASE is bound by all state and federal laws governing the

exchange, storage, destruction, and dissemination of Participant data. BASE does not use any of the personally identifiable information of Participants for purposes outside of BASE's provision of services to the applicable Organization. BASE also does not create profiles of Participants for its own purposes or engage in behavioral-targeted advertising with Participants.

## **Collection and Use of Non-Participant Personal Information**

BASE may collect personally identifiable information from adult, non-Participant users of the BASE application and websites, such as parents, teachers, and administrators. The information that we collect from such adult users include names and email address. If you purchase BASE's products and services, we will collect certain billing information. This information is used to complete the purchase transaction. BASE may also collect anonymous demographic information, which is not unique to you, such as your age, gender and education level. This is used to personalize and improve our services.

In certain cases, adults may also participate in coursework, including educators taking additional professional training courses and parents or guardians taking modules similar to those provided to Participants. In these cases, BASE will also receive the information provided by these adults as part of the coursework that they complete.

BASE collects and uses your personal information to personalize and improve our services; to allow users to set up a user account and profile through the BASE application; and to operate the BASE website(s) and deliver the services requested.

BASE may also use your personally identifiable information to inform you of other products or services available from BASE and its affiliates and to contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

## **Application Usage and Cookies**

In addition to the information directly collected from the customers and users of the BASE application and websites, we also collect certain information by automated means regarding the usage of our services. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the BASE application and websites, to maintain quality of our services, and to provide general statistics regarding use of the BASE website.

The BASE websites may use "cookies" to help you personalize your online experience and perform analysis of the use of the BASE websites. A cookie is a text file that is placed on your Internet-connected device by a web page server. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize BASE pages, or register with BASE websites or services, a cookie helps BASE to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same BASE website, the information you previously provided can be retrieved, so you can easily use the BASE features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the BASE services or websites you visit.

Additionally, we use certain third-party service providers, including specifically Google Analytics, to assist us by providing analytics information for our Sites. For more information about Google Analytics' privacy practices, see here: <https://policies.google.com/technologies/partner-sites>. You may opt out of Google Analytics by installing the following browser extension from Google: <https://tools.google.com/dlpage/gaoptout>.

## Disclosure of Personal Information

BASE does not sell, rent or lease its customer lists to third parties.

BASE may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using this data except to provide these services to BASE, and they are required to maintain the confidentiality of your information. Where these partners handle personal information of Participants, we require them to meet our commitments to respect the privacy of that information, including in their use of the information, their data retention policies, and their security practices.

While we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control, we may in the future. If we do, we may share some or all information with such affiliates, provided that they honor this Privacy Policy.

Additionally, BASE may disclose your personal information, without notice, only if such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on BASE; (b) protect or defend the rights, safety, or property of BASE, users of the BASE application and services (including lawful disclosures in the event that a BASE application course taker indicates plans for self-harm or harming others); (c) to enforce our agreements, policies, and terms of use; (d) in an emergency to protect the personal safety of any person.

We also reserve the right to transfer your personal information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will ensure that the successor entity, at the time of the closing of the transaction, either: (i) continues to be bound by the terms and conditions of this Privacy Policy, or (ii) agrees to be bound by privacy and security obligations at least as strong as those set forth in this Privacy Policy.

## Third-Party Websites

The BASE websites or applications may contain links to third-party websites. These third-party websites are not under BASE's control. We encourage you to review the privacy statements of websites you choose to visit from BASE so that you can understand how those websites collect, use and share your information. BASE is not responsible for the privacy statements or other content on websites outside of the BASE website.

## **Security and Retention of your Personal Information**

We have implemented physical, administrative, and technical measures to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We also encrypt all data in transit and at rest. Please note that the electronic transmission of information is not completely secure. We cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or that such measures will always be sufficient or effective. Any transmission of personal information is at your own risk.

How long we keep the personal information we collect depends on the type of information, the purpose for which it is used, how sensitive it is, and similar factors. We only maintain the personally identifiable information of Participants for as long as necessary to deliver our services to the applicable Organization. As for other types of personal information, we will retain it for the length of time reasonably needed to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

## **Opt-Out & Unsubscribe from Marketing Communication**

We respect your privacy and give you an opportunity to opt-out of receiving announcements of our marketing or advertising information. Users may opt-out of receiving any or all marketing communications from BASE by contacting us here: [info@base-ed.com](mailto:info@base-ed.com).

## **Do Not Track Signals**

Your web browser may let you choose your preference as to whether you want to allow the collection of information about your online activities over time and across different websites or online services. At this time, the BASE application and websites do not respond to the preferences you may have set in your web browser regarding such collection of your information, and we may continue to collect information in the manner described in this Privacy Policy.

## **Children Under Thirteen**

The BASE application may be used to collect personally identifiable information for children under the age of thirteen, provided that the child's parent(s) consent to the child using BASE's products.

If you are under the age of thirteen, you must ask your parent or guardian for written consent and permission to use the BASE application.

If you are a parent and you have questions regarding our data collection practices, please contact us using the information provided at the end of this Privacy Policy.

## **Changes to this Privacy Policy**

BASE may occasionally update this Privacy Policy to reflect company and customer feedback or changing legal requirements or business practices. If we make a material change to our Privacy

Policy, we will provide a prominent notice to you (by email and/or posting on our website) that our privacy practices have changed and will provide a link to the new policy. We will not change our privacy practices to be inconsistent with our contractual commitments with our Organizations. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy. BASE encourages you to periodically review this Privacy Policy to be informed of how BASE is protecting your information. The date this Privacy Policy was last revised is at the bottom of this page.

## **Contact Information**

BASE welcomes your questions or comments regarding this Privacy Policy. If you believe that BASE has not adhered to this Privacy Policy, please contact BASE at:

Email Address: [info@base-ed.com](mailto:info@base-ed.com)

Effective as of February 6, 2015  
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