

## Privacy policy for Karen Pryor Clicker Training

Updated 5-22-2018

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as some of those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 Our website may incorporate privacy controls which affect how we will process your personal data. By using the privacy controls, you may be able to control some of the direct communications from us. Only registered users of our web site may control this information directly. You can access these controls via the "my account" or equivalent sections of the different websites. The following websites each have distinct user control panels. Kindly note that the user control panels do not all provide the same type level of control.
  - [clickertraining.com](http://clickertraining.com).
  - [shop.clickertraining.com](http://shop.clickertraining.com)
  - [video.clickertraining.com](http://video.clickertraining.com)
  - [karenpryoracademy.com](http://karenpryoracademy.com)
  - [learning.karenpryoracademy.com](http://learning.karenpryoracademy.com)
- 1.5 In this policy, "our website" and "our websites" refers to the websites [clickertraining.com](http://clickertraining.com), [karenpryoracademy.com](http://karenpryoracademy.com) our subdirectories and and subdomains (eg.[clickerexpo.clickertraining.com](http://clickerexpo.clickertraining.com)) and custom or "white label" domains that we use for the provision of services ([learning.karenpryoracademy.com](http://learning.karenpryoracademy.com))
- 1.6 In this policy, "we", "us" and "our" refer to *Sunshine Books, Inc. /d/b/a/ Karen Pryor Clicker Training*. and included the family of brands, websites, subdomains and services of Karen Pryor Clicker Training including; the gateway site [clickertraining.com](http://clickertraining.com) as well as [shop.clickertraining.com](http://shop.clickertraining.com), ClickerExpo ([clickerexpo.clickertraining.com](http://clickerexpo.clickertraining.com)), Video on Demand, ([video.clickertraining.com](http://video.clickertraining.com)), The KPCT National Training Center a.k.a. "The Ranch", ([theranch.clickertraining.com](http://theranch.clickertraining.com)), Karen Pryor Academy ([karenpryoracademy.com](http://karenpryoracademy.com)) and [learning.karenpryoracademy.com](http://learning.karenpryoracademy.com) For more information about us, see Section 13.

## 2. Credit

2.1 This document was based on a template from SEQ Legal (<https://seqlegal.com>).

## 3. How we use your personal data

3.1 In this Section 3 we have set out:

- (a) the general categories of personal data that we may process;
- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) the legal bases of the processing.

3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is consent OR our legitimate interests, namely monitoring and improving our website and services.

3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business, OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at you request, to enter into such a contract.

3.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include, your name, email address, contact phone, mailing address, courses taken, events attended, purchase history of

products and services, dietary restrictions/allergies and personal information needed to plan event and courses. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- 3.6 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.7 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.
- 3.8 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships.
- 3.9 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transaction. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 3.10 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- 3.11 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.12 We may process information that in relation to a live event ("**live event data**"). This data may include short videos of photographs that contain your likeness or image and or that of an animal in your control. The source of this data is you or a contractor or volunteer employed by us. This data may be processed for event promotion. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.13 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.14 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.15 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to any member of our family of companies and contracted personnel insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 We may disclose any and all of the categories of personal data in section 3 (usage data, account data, enquiry data etc ) to our third party application suppliers or subcontractors and data processors in so far as reasonably necessary for the same

purposes specified above for our legitimate interests, namely the proper administration of our website and business and communications with users. These third parties are obligated to use to use this information only for the provision of our services. The categories of third party recipients (application suppliers, subcontractors, data processors) for your personal data include:

- (a) Communication management; that allow us to implement your email and communication preferences including when you opt in or opt out of receiving optional communications
- (b) Membership management; that allow us to manage our membership programs to which you may belong; for example, you may belong to Certified Trainer Partner membership program.
- (c) Event Registration, Store and Learning Systems; that allow us to have products and services available for purchase, a registration system for events, and a learning system through which to manage your education experience
- (d) Customer service; that allow us to provide customer service; for example, we use third party apps to provide live customer service
- (e) Personalization/Optimization; i) that allows us while you are visiting our website or using our services the best experience. For example, when we stream a video the system may adjust the video to compensate for the speed of your internet connection

4.4 Financial transactions relating to our website and services may be handled by payment services providers, PayPal, Authorize.net Worldpay, Stripe. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

4.5 Purchasers of our business. We will share your personal data in those cases where we sell or negotiate to sell our business to a buyer or prospective buyer. In this situation, we will continue to ensure the confidentiality of your personal data and give you notice before your personal data is transferred to the buyer or becomes subject to a different Privacy Policy.

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. International transfers of your personal data**

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred

- 5.2 The hosting facilities for our website are situated in the United States of America. We also use third party services and applications who may host data in other countries.
- 5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data only as long as necessary to provide you with the KPCT services and for legitimate and essential business purposes, such as maintaining the performance of our service, making data-driven business decisions about new features and offerings, complying with our legal obligations, and resolving disputes. We keep some of your personal data for only as long as you are an active user of specific service. For example, if you take a course with us through Karen Pryor Academy, we keep a detailed history of your course progress but once complete the course the details of that history are not maintained but we maintain a record that u completed the course linked with your name and email. If you request, we will delete or anonymize your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data, including situations such as the following:
  - (a) If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved
  - (b) Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
  - (c) Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.
- 6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Amendments**

- 7.1 We may update this policy from time to time by publishing a new version on our website. When we make material changes to this Policy, we'll provide you with

prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Spotify Service or by sending you an email. We may notify you in advance.

- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of significant changes to this policy by email or through the website.

## **8. Your rights**

- 8.1 In this Section 8, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 8.2 Your principal rights under data protection law are:
  - (a) the right to access;
  - (b) the right to rectification;
  - (c) the right to erasure;
  - (d) the right to restrict processing;
  - (e) the right to object to processing;
  - (f) the right to data portability;
  - (g) the right to complain to a supervisory authority; and
  - (h) the right to withdraw consent.
- 8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed.

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claim.

- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
  - (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.



- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. If you are a citizen of the EU, you may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us at our mailing address OR by submitting the contact form on any of our contact us pages on our website

## **9. About cookies**

- 9.1 Cookies are small pieces of text and numbers in file form used to store information on web browsers. A cookie is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies are used to store and receive identifiers and other information on computers, phones, and other devices. Other technologies, including data we store on your web browser or device, identifiers associated with your device, and other software, are used for similar purposes. In this policy, we refer to all of these technologies as "cookies".
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Cookies that we use**

- 10.1 We use technologies, such as cookies, to customize content and advertising, to provide social media features and to analyse traffic to the site. We use cookies for the following purposes:
  - (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website
  - (b) status - we use cookies to help us to determine if you are logged into our website
  - (c) personalization - we use cookies to store information about your preferences and to personalize the website for you

- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (e) advertising - we use cookies to help us to display and communicate products or services that will be relevant to you.
- (f) analysis - we use cookies to help us to analyze the use and performance of our website and service; and
- (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## **11. Cookies used by our service providers**

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website and we share information about your use of our site with our trusted social media, advertising and analytics partners
- 11.2 We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.
- 11.3 We use the third-party applications and process subcontractors that use cookies to do a variety of tasks related to providing our services to you from tracking shipments, executing payments, creating event registration records, tracking items in your shopping cart, for example. We contract with third-party service providers to assist us in better understanding our site visitors and to help us communicate with our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.
- 11.4 We partner with social media and advertising platforms like Facebook and Google. We use these platform's pixels (a type of cookie) on our website to display relevant ads to you on social media platforms and on the internet pages you visit that accept advertising and participate with these platforms. We also use Facebook's Custom Audience feature enables us to display advertisement to you using personal data in combination with cookies. We do not share personal information about your activities on our website with Facebook, but we share a hashed email address or phone number which permits Facebook to identify our advertising audience based on the information that Facebook collects from its users. When using Facebook's custom audiences feature, the data we collect is locally hashed on our system before we upload and pass such data to Facebook. You may control the information both Google and Facebook collect from the privacy control on their websites. If you wish to opt out on our site, please contact us using the forms available on our websites. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. Facebook's privacy policy is at <https://www.facebook.com/policies/cookies/>

## **12. Managing cookies**

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

## **13. Our details**

13.1 This website is owned and operated by Sunshine Books Inc d/b/a Karen Pryor Clicker Training.

13.2 We are registered as a MA corporation in the United States and our registered office is at 49 River Street Suite 3 Waltham MA 02453 which is our principal business office

13.3 You can contact us:

- (a) by post, to the postal address given above
- (b) using our website contact form (preferred)
- (c) by telephone, on the contact number published on our website or
- (d) by email, using the support email addresses published on our website.