

# **STEG Consumer Privacy Policy**

*Effective Date May 1, 2021*

## **Scope**

The STEG Consumer Privacy Policy applies generally to consumer and customer personal data, also known as personal information, received by StrataTech Holdings, LLC, Tulsa Welding School, Inc., Tulsa Welding School/Jacksonville Campus, Inc., Tulsa Welding School/Houston Campus, Inc., The Refrigeration School, Inc., and all of their affiliated and subsidiary entities (collectively "STEG", "we", "us", or "our") in any format. STEG will ensure all consumer personal information we handle conforms to this policy.

The STEG Consumer Privacy Policy does not cover personal information collected in connection with an individual's employment by or seeking employment from STEG. If you are employed by or seeking employment from STEG, please see our Employee Privacy Policy for information regarding the personal information we collect in that capacity.

## **Our Commitment to Privacy**

Your privacy is important to us at STEG and we are committed to safeguarding, preserving, and respecting the privacy rights of our consumers, customers, and visitors. This online privacy statement (the "Statement" or "Notice") describes how we collect, use, disclose, and secure the personal information we gather about you through our websites, <https://www.tws.edu>, <https://www.rsi.edu>, or our learning platforms (collectively referred to as the "Website"), or otherwise. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

This Statement does not apply to any other website maintained by other companies or organizations to which we link. STEG is not responsible for the content or activities provided on those websites.

## **You Consent to This Statement**

By accessing, browsing, or otherwise using the Website or other online STEG-owned or operated platforms, you confirm that you have read, understood, and agreed with this Statement. If you do not agree to this Statement, you may not use this Website or other online STEG-owned or operated platforms.

This Statement applies regardless of how the Website is accessed and will cover any technologies or devices by which STEG makes the Website available to you.

If you have any questions or concerns about our personal information policies or practices, you can contact us in the methods described in the "**How to Contact Us**" section below.

## **The Information We Collect and How We Use It**

We collect the information you voluntarily provide directly to us, such as when you complete a form or submit information to us. We also collect information when you interact with the Website, for example, through our use of cookies.

### ***Information You Provide***

- *Completing Forms on our Website.* If you request to receive information by submitting any STEG contact form, we may ask you to provide information such as your name, email address, mailing address, and/or telephone number.
- *Contacting Us.* If you send us an email, we will collect your email address and any information that you provide in the email. Similarly, if you use our "live chat" feature, we will collect the information you provide us in the live chat. If you contact us by phone, we will collect the phone number used to contact us, and any information you provide during the call. Calls may be recorded for quality assurance or training purposes.
- *Submitting Applications.* If you submit an application, we collect the information you provide as part of the online application process.
- *Social Media.* If you interact with our Website by sharing on a social media platform, we may collect information that you post. Please note that your comments will be visible to the public, so you should never share personal information that you would like to keep private.
- *Surveys.* From time to time, we may request information via surveys. Participation in these surveys is completely voluntary, and you may choose whether or not to participate and therefore disclose information. Information requested may include contact information and demographic information.

### ***Information We Collect as You Navigate Our Website***

We automatically collect certain information as you use the Website, such as the following:

- *Usage Information.* We may collect information automatically through your use of the Website, such as which of the pages on the Website you access, the frequency of access, and what you click on while on our Website.
- *Device Information.* We may collect information about the device you are using, such as hardware model, operating system, application version number, browser, and IP addresses.
- *Mobile Device Information.* In addition to the Device Information listed above, when you access our Website via a browser on your mobile device, we may collect mobile network information, including telephone number, the unique device identifier assigned to that device, mobile carrier, operating system, and other device attributes.
- *Location Information.* We may collect information about your actual location which maybe determined from GPS and other sensors that may reveal information on or nearby devices, Wi-Fi access points, and cell towers.

### **How Do We Use "Cookies" and Other Tracking Technologies?**

We use "Cookies" and other Web technologies to collect information and support certain features of our Sites. We may send one or more Cookies to your computer or other device. We also use other similar technologies such as tracking pixels, tags, or similar tools when you visit our Website. These technologies can collect data regarding your operating system, browser type, device type, screen

resolution, IP address, and other technical information, as well as navigation events and session information as you interact with our Website. This information allows us to understand how you use the Website.

### ***What Are Cookies?***

Cookies are small files created by websites, including our Website, that reside on your computer's hard drive and that store information about your use of a particular website. When you access our Website, we use Cookies and other tracking technologies to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Website according to your individual needs;
- Contact you to provide you with information or services that you request from us;
- Advertise new content, events, and services that relate to your interests;
- Provide you with more personalized content that is most relevant to your interest areas; and
- Recognize when you return to our Website.

We set some Cookies ourselves and others are set by third parties. You can manage your Cookies preference as described in the "**Managing Your Cookies**" section below.

### ***What Types of Cookies Do We Use and Why?***

These are the different types of Cookies that we and our service providers use on the Website:

- *Essential Cookies.* These Cookies are required for the operation of the Website and enable you to move around the Website and use its features. Disabling these Cookies can negatively impact the Website's performance.
- *Analytics, Performance and Research Cookies.* These Cookies allow us to analyze activities on the Website. They can be used to improve the functioning of the Website. For example, these Cookies recognize and count the number of visitors and see how they move around the Website. Analytics Cookies also help us measure the performance of our advertising campaigns to help us improve them and to optimize the Website's content for those who engage with our advertising.
- *Functionality Cookies.* These Cookies are used to recognize you when you return to the Website. This enables us to personalize content for you and remember your preferences.
- *Social Networking Cookies.* These Cookies are used to enable you to share pages and content that you find interesting on our Website through third-party social networking and other websites. These Cookies may also be used for advertising purposes.

### ***How Long Do Cookies Stay on My Device?***

Some Cookies operate from the time you visit the Website until the end of that particular browsing

session. These Cookies, which are called "session cookies," expire and are automatically deleted when you close your Internet browser.

Some Cookies will stay on your device between browsing sessions and will not expire or automatically delete when you close your Internet browser. These Cookies are called "Persistent Cookies" and the length of time they will remain on your device will vary from Cookie to Cookie. Persistent Cookies are used for a number of purposes, such as storing your preferences so that they are available for your next visit and to keep a more accurate account of how often you visit the Website, how your use of the Website may change over time, and the effectiveness of advertising efforts.

### *Managing Your Cookies*

It may be possible to block Cookies by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Website.

You can find out more about Cookies and how to manage them by visiting [www.AboutCookies.org](http://www.AboutCookies.org).

### *Google Analytics*

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Website, compile reports on the Website's activity, and provide other services related to Website activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, [click here](#).

We also use Google Remarketing features to collect data about visitors to our Website to, among other things, deliver advertising content on sites across the Internet in a manner that is specifically directed toward the interests expressed by the visitors while on our Website. Google uses Cookies to serve ads based on someone's past visits to the Website. You can opt-out of Google's use of Cookies to serve ads based on your past visits to the Website via the following link: Google Ad Settings.

### *Does the Website Respond to "Do Not Track" Signals?*

There is currently no industry agreed-upon response to a Do Not Track signal. At this time, our Website does not respond differently based on a user's Do Not Track signal.

## **How We Use the Personal Information**

We use personal information we collect about you or that you provide to us in the following ways:

- To present our Website and its contents in a suitable and effective manner for you and your device;
- To provide you with information or services that you request from us or that we think may be of interest to you;
- To facilitate transactions;
- To advertise services that we think may be of interest to you;
- To send you our newsletter and/or invite you to attend our events;
- To provide customer support, troubleshoot issues, manage accounts, and respond to requests, questions, or comments;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us; and
- To notify you about any additions, deletions, upgrades, or changes in our services.

## **How We Share the Personal Information We Collect**

STEG may share your personal information:

- With third parties who perform data services on our behalf (e.g., hosting, maintenance, backup, analysis, etc.). Any such third parties will be under an obligation to us to maintain the confidentiality of your personal information;
- To third-party service providers to prepare, deploy, and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information;
- We disclose your information when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies, various States offices, or the U.S. Department of Education, or to comply with the law, a court order, or a subpoena;
- To any third parties as part of any business or asset sale;
- In the event of bankruptcy, as part of a sale in connection with reorganization or liquidation proceedings; and

- To any other person or entity where you consent to the disclosure.

## **Online Learning Platforms**

*Content You Submit via Various Learning Platforms.* As a STEG student, you may be expected to generate original content and submit that content for evaluation by your instructor through one or more online learning platforms. The assignments you submit may be accessible to other non-STEG employed persons (e.g., your classmates). You should understand that if you post content in a learning platform in a manner accessible to other non-STEG employed persons, it may be more widely disseminated.

As on any of our Websites, the content you submit to a learning platform must comply with any other applicable policies, such as the student code of conduct.

*STEG's Use of Content You Submit to a Learning Platform.* STEG uses the content you submit to any of our learning platforms primarily to evaluate your performance in a particular course and to assign you a grade. In addition, feedback you submit during the course and the instructor evaluation you submit at the end of a course may be used to improve the course and other STEG products, programs, and services. STEG may also use information available through its learning platforms for academic advising purposes and advisories. If you perform poorly in a particular course, STEG may use information available through its learning platforms to refer you to tutoring or other appropriate support services. However, STEG will not use in any public advertising or promotional campaign content you post to its learning platforms solely for purposes of fulfilling a course requirement.

## **How to Contact Us**

If you have any questions, comments, or concerns regarding about our personal information policies or practices, you can contact us through:

- Phone by calling us at (602) 490-3450 ext.118;
- Email by emailing our Compliance Department at [compliance@stratatech.com](mailto:compliance@stratatech.com); or
- Written correspondence directed to:

StrataTech Education Group  
Care of: Compliance Dept.  
120 N 44<sup>th</sup> St #230  
Phoenix, AZ 85034

## California Privacy Rights

If you are a California user, you have certain rights with respect to the collection, use, transfer, and processing of your "Personal Information," as defined by the California Consumer Privacy Act ("CCPA") and its subsequent amendments. We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others. To exercise any of the rights below, please contact us via the contact information below. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information.

### *What Information Do We Collect?*

*Cal. Civ. Code. § 1798.140(0)* defines the following categories of Personal Information:

Category <sup>1</sup>	Examples
<b>A. Identifiers</b>	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
<b>B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name, signature, Social Security Number (SSN), physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.
<b>C. Protected Classification Characteristics Under California or Federal Law</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
<b>D. Commercial Information</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
<b>E. Biometric Information</b>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

<b>F. Internet or Other Similar Network Activity</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
<b>G. Geolocation data</b>	Physical location or movements.
<b>H. Sensory Data</b>	Audio, electronic, visual, thermal, olfactory, or similar information.
<b>I. Professional or Employment -related Information</b>	Current or past job history or performance evaluations.
<b>J. Non-Public Education Information</b>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
<b>K. Inferences Drawn of the Consumer</b>	Inferences drawn from Personal Information identified above to create a profile about a consumer reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

<sup>1</sup> Categories of Personal Information are as defined in *Cal. Civ. Code. § 1798.140(0)*

The above examples are illustrative examples from the CCPA and do not reflect the specific pieces of information we collect.

***Sources from Which Personal Information is Collected***

We collect your personal information in categories A (identifiers), B (personal), C (protected classifications), D (commercial), H (sensory), and J (educational) directly from you. We collect the personal information in category D (commercial) by keeping a log of your transactions. We collect the personal information in categories F (internet), G (geolocation), and K (inferences) based on your interactions with our website and mobile apps.

***Business or Commercial Purposes for Which Personal Information is Collected***

Your Personal Information is used for the following purposes:

- To provide educational services;
- To provide the information, products and services you request;
- To provide you with customer support and respond to your communications;
- To personalize your experience on our Website or mobile apps;

- To improve the content, functionality and usability of our Website;
- To better understand your needs and interests;
- To send you information relating to other programs, services, or products that we believe may be of interest to you; and/or
- To contact you with information and notices related to your use of our Website;
- To invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us);
- To improve our products and services;
- To improve our marketing and promotional efforts;
- For security, credit or fraud prevention purposes; and
- To comply with legal obligations.

***Third Parties with Whom Personal Information is Shared***

In the preceding 12 months, we have disclosed the following Personal Information about consumers for business purposes:

- We share Personal Information in categories: A (identifiers), B (personal), D (commercial), F (internet), G (geolocation), and K (inferences) with third party service providers, benefits providers, transaction processors, and advertising providers.
- We may share content posted on our social media platforms with other consumers (e.g., through a retweet or by sharing a consumer "comment" on a story). Such posts may include Personal Information in categories A (identifiers) and B (personal), but the content depends on each individual post.
- We allow certain companies to use Personal Information in categories F (internet), G (geolocation) and K (inferences) to enhance online experiences and customize advertising.
- We disclose your Personal Information in categories A (identifiers), B (personal), and J (educational) when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies, State offices, or the U.S. Department of Education or to comply with the law, a court order, or a subpoena. The categories of Personal Information shared for this purpose may change depending on the nature of the law, court order, or subpoena.

STEG does not sell your Personal Information.

***Individual Rights***

- a. Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that STEG disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Rights to Know requests that you can make:

1. **Right to Know (Abbreviated Request):** If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
  - a. Categories of Personal Information collected;
  - b. Categories of sources from which Personal Information is collected;
  - c. Business purpose for collecting; and
  - d. Categories of third parties with whom shared.
2. **Right to Know (Specific Pieces of Information Request):** If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
  - a. Specific pieces of Personal Information collected about you.

This information will be provided to you free of charge, unless STEG determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

There are certain exceptions to a consumer's Right to Know. STEG will state in its response if an exception applies.

b. Right of Deletion

You have the right to request that STEG and our service providers delete any Personal Information about yourself which STEG has collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. STEG will state in its response if an exception applies.

c. Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your Personal Information by a business subject to certain laws and regulations.

STEG does not, and will not, sell any personal information of California consumers. STEG will update this Statement and comply with applicable laws and regulations in the event that it sells personal information of California consumers in the future.

d. Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. STEG will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different

prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

e. Submitting Requests

You can submit your request by calling us at (602) 490-3450 ext. 118. You may also submit a request by email at [compliance@stratatech.com](mailto:compliance@stratatech.com) or by mail at:

StrataTech Education Group  
Care of: Compliance Department  
120 N 44<sup>th</sup> St #230  
Phoenix, AZ 85034

f. Verifying Requests

When STEG receives a request, it must verify that the person requesting information or deletion is the California consumer about whom the request relates in order to process the request. To verify a California consumer's identity, we may request up to three pieces of Personal Information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us.

We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. STEG reserves the right to take additional steps as necessary to verify the identity of California consumers where we have reason to believe a request is fraudulent.

g. Authorized Agents

You may choose a person registered with the California Secretary of State that you authorize to act on your behalf to submit your requests ("Authorized Agent"). If you choose to use an Authorized Agent, STEG requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with STEG. Failure to do so may result in STEG denying your request.

***Contact for More Information***

If you have any questions or concerns regarding your California Privacy Rights under this Privacy Policy, please feel free to contact us at (602) 490-3450 ext. 118 or send us an email at [compliance@stratatech.com](mailto:compliance@stratatech.com).

*Last Updated: May 1, 2021*

## **Third-Party Links**

The Website may contain links to third-party websites. When STEG provides links, it does so only as a convenience and does not endorse any products or services and is not responsible for any content of any third-party website or any links contained within. It is important to note that this Notice only applies to this Website. We are not responsible and assume no responsibility for any personal information collected, stored, or used by any third party as a result of you visiting their website. We also advise that you read the privacy notice of any third-party websites you choose to visit carefully.

## **Unsubscribe From Communications**

If you no longer wish to receive certain email communications from us, please click on the UNSUBSCRIBE link contained within any email from us. Please note that even if you unsubscribe, we may still need to contact you regarding certain issues.

## **SMS Terms and Conditions**

We will only text you if you opt in to receive text messages. You can opt out at any time.

To stop receiving SMS messages from STEG, reply STOP to any SMS message received from us. To unsubscribe, you'll receive 1 final text confirming you have been unsubscribed in our system. You won't get any other text messages unless you reactivate your subscription.

As always, message and data rates may apply for any messages sent to you from us and to us from you. If you have any questions about your text plan or data plan, contact your wireless provider.

## **Our Commitment to Data Security**

The security of your personal information is important to us. We take various reasonable organizational and technical measures to protect your personal information from unauthorized access, disclosure, alteration, or malicious destruction. We have policies and procedures in place to ensure STEG employees and contractors know what is expected of them in relation to the handling and disposition of personal information. We have in place appropriate procedures for accessing our system and access is limited by role. We have also put processes in place to address suspected breaches of your personal information. If required by law to do so, we will notify you and/or the relevant supervisory authority in the event of a data breach.

## **Our Commitment to Children's Privacy**

Protecting the privacy of the very young is especially important. This Website is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. In the event that we learn that we have collected personal information from a child under age 13 without verification or parental consent, we will immediately delete that information. If you believe that we might have any information from or about a child under 13, please contact us using the information provided in the "**How to Contact Us**" section above.

## **Changes to This Privacy Policy**

This Notice may change from time to time. We will post any changes to the Notice on this page.